#### NOTICE OF PREPARATION

#### for the

### EHL RESERVOIR AND INTAKE CHANNEL PROJECT ENVIRONMENTAL IMPACT REPORT, IMPERIAL, CALIFORNIA

To: Responsible Agencies, Stakeholders and Interested Parties

From: Imperial Irrigation District Water Department

Subject: Notice of Preparation of an Environmental Impact Report for the EHL

**Reservoir and Intake Channel Project** 

Pursuant to the California Environmental Quality Act, California Public Resources Code sections 21000, *et seq.*, Imperial Irrigation District (IID) will be the Lead Agency responsible for preparation of an Environmental Impact Report (EIR) for the EHL Reservoir and Intake Channel Project (proposed project), which will address the potential environmental effects of the proposed project.

The proposed project includes a single basin reservoir facility, with a water storage capacity of 2,100 acre-feet, covering approximately 440 acres, that would manage up to 365,000 acre-feet of water annually with the potential of conserving approximately 15,000 acre-feet of water per year. The proposed project description, location, initial study and a summary of the potential environmental effects are provided on the following pages. The summary of the potential environmental effects of the proposed project is not an analysis of the proposed project or its impacts. The proposed project summary information is intended to provide interested parties and responsible or trustee agencies with sufficient information describing the proposed project and the potential environmental issues that will be addressed in the EIR so that meaningful responses and comments can be provided. IID requests responses from any responsible or trustee agency in compliance with CEQA requirements.

Due to the time lines mandated by state law, your response to this Notice of Preparation (NOP) must be sent at the earliest possible date, but not later than November 10, 2023. Written comments in response to this NOP or questions should be sent to:

Justina Gamboa-Arce
Senior Water Resources Planner, Water Department
Imperial Irrigation District
333 E. Barioni Boulevard
P.O. Box 937
Imperial, California 92251
760.339.9085

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#### 1 INTRODUCTION

#### 1.1 Project Location

The proposed project site consists of a combined total of approximately 591 acres of primarily agricultural land located within the County of Imperial (County), approximately 8 miles southeast of Holtville, California, and approximately 11 miles east of Calexico, California. See Figure 1-1 Project Regional Location. The proposed project is located north of the AAC, east of the East Highline Canal and west of Bureau of Land Management (BLM) land. The reservoir basin is proposed to be located directly north of Verde School Road. Agricultural fields are to the northwest, west and south of the proposed project site within a predominantly unpopulated area. There is one single family residence located approximately 150 feet south of the proposed reservoir basin and a second single-family dwelling east of Holdridge Road, which parallels the intake channel at a north/ south orientation. Open and vacant desert land with desert shrubbery and patches of groundcover owned by BLM is to the northeast and east of the proposed project site. The proposed project site is primarily flat land zoned as A-2 (General Agriculture) and A-3 (Heavy Agriculture) (County of Imperial 2017).

#### 1.2 Project Description

Pursuant to the California Environmental Quality Act, California Public Resources Code sections 21000, et seq., and the State CEQA Guidelines, Title 14 of the California Code of Regulations sections 15000, et seq. (collectively, CEQA), the Imperial Irrigation District (IID) is preparing a Draft Environmental Impact Report (Draft EIR) as the Lead Agency for the EHL Reservoir and Intake Channel Project (proposed project). The Draft EIR will evaluate the impacts of implementing the proposed project, which consists of a main canal off-line operational reservoir and intake channel for the primary purpose of serving IID's agricultural water users.

The proposed project includes a single basin reservoir facility, with a water storage capacity of 2,100 acre-feet, covering approximately 440 acres, that would manage up to 365,000 acre-feet of water annually. The water managed in the proposed reservoir would be channeled from an AAC Reach then gravity flow into reservoir basin prior to being channeled into the East Highline Canal, one of three main canals that branch off the All-American Canal (AAC). The intake channel, which would branch off the east side of the AAC Reach via a culvert system to convey the operational water flows from the AAC Reach through federally owned land via the culverts which transition into an open channel canal that connects to the proposed reservoir at a flow rate of up to 1,500 cubic feet per second (cfs). Stored water would be delivered through an automated gate outlet and structure with a gravity flow capacity of approximately 1,000 cfs for delivery into the East Highline Canal and downstream users.

Approximately 63 acres of the proposed intake channel would be constructed on agricultural land and approximately three acres would cross Reclamation federally-owned lands, at the southwestern end of the proposed intake channel route off of the AAC Reach. The proposed intake channel would consist of an open channel approximately 70 feet wide and 10 to 15 feet deep from the top of the embankments. The embankments of both the proposed reservoir and the proposed intake channel would have a height of no greater than 10 feet above existing grade. The proposed reservoir would be excavated up to approximately five feet below grade. Impacts to the AAC Reach and East Highline Canal include the cutting of the respective bank to allow a direct connection to the open intake channel and outlet facilities, respectively. The cut bank and flow gate would alter approximately 150 feet of the AAC Reach and East Highline Canal bank.

Two potential staging areas are anticipated in the northwest portions of the proposed project site, as indicated in Figure 1-2 Conceptual Layout. A third potential staging area was assessed on private agricultural land to the south of the intake, however it is not anticipated that the third staging site will be needed. Water temporarily stored in the proposed reservoir would be delivered to serve downstream agricultural demands through an automated gate outlet with a gravity flow capacity of approximately 1,000 cfs for delivery into the East Highline Canal. IID does not provide treated water service.

Reclamation is the federal Lead Agency under the National Environmental Policy Act, 42 U.S.C. sections 4321 *et seq.* (NEPA) due to the proposed project including an intake channel traversing land owned by Reclamation. Reclamation is preparing an Environmental Assessment (EA) to analyze the potential environmental impacts of the proposed project to determine the NEPA document to be prepared.

### 1.3 Purpose

The construction and use of the proposed project is primarily for agricultural purposes to have a large operational reservoir that will allow for the management of up to 365,000 acre-feet of water annually to address fluctuating downstream agricultural demands due to increases in requests for shorter 12-hour water deliveries or any reductions from the normal 24-hour water delivery period. The proposed project will also allow for water conservation by creating a more efficient canal system with this additional water management facility upstream of most of IID's water service area. Up to an approximate 15,000 acre feet is expected to be conserved annually. Reclamation has determined that the proposed project will be beneficial as it allows for the improved management of Colorado River water deliveries to agricultural users within IID's distribution system to maximize water conservation opportunities.

### 1.4 Potential Environmental Effects & Recommended Environmental Documentation

On the basis of this initial evaluation, I find that the proposed project MAY have a significant effect on the environmental and an Environmental Impact Report is required. A Draft EIR will analyze potential environmental impacts in the following areas: air quality, biological resources, cultural resources, hazards and hazardous materials, and cultural resources. All other impacts are anticipated to be less than significant and will not be analyzed in the Draft EIR.

Prepared and Approved by:

Justina Gamboa-Arce Senior Water Resources Planner Imperial Irrigation District

### 1.5 Response to Notice

Interested persons and responsible and/or trustee agencies having jurisdiction over the proposed project are requested to respond to this NOP in compliance with CEQA requirements. Responding agencies should identify a contact person for their agency.

Responses to this NOP must be received no later than November 10, 2023. Please send your written comments or questions to:

Justina Gamboa-Arce
Senior Water Resources Planner, Water Department
Imperial Irrigation District
333 East Barioni Boulevard
P.O. Box 937
Imperial, California 92251
760.339.9085August 2023

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#### 2 ENVIRONMENTAL CHECKLIST / INITIAL STUDY

#### 2.1 Aesthetics

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I.	AESTHETICS – Would the project:				
a)	Have a substantial adverse effect on a scenic vista?				
b)	Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				
c)	In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				

#### a) Would the project have a substantial adverse effect on a scenic vista?

No Impact. The proposed project is not located near any existing scenic vista. The County General Plan does not provide a definition for a scenic vista. For the purposes of this analysis, a scenic vista is described as scenic features that are listed, designated or otherwise recognized by the County. The site is adjacent to agricultural fields to the south northwest and west with the East Highline Canal, a large water conveyance facility. To the east and northeast, is BLM land, which consists of open, desert landscape. The majority of the proposed project site is used for agricultural purposes. There are no scenic vistas within the viewshed of the various aspects of the proposed project, given the flat nature of the proposed project site. Therefore, no impacts to scenic vistas would result from construction or operations of the proposed project. This topic will not be analyzed in the Draft EIR.

b) Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. No officially designated state scenic highways exist within the proposed project vicinity. Interstate 8 (I-8), located approximately 2.3 miles north of the proposed project site, is considered a potential state-designated scenic highway. As stated in the Imperial County (County) General Plan Circulation and Scenic Highway Element, the initial segment of I-8 for future Scenic Highway Designation status lies between the San Diego County line and its junction with State Route 98 (County of Imperial 2008). However, because the I-8 segment is not currently a state-designated scenic highway, the impact would be less than significant. The proposed project site consists of agricultural fields with no visual resources such as trees, rock outcroppings or historic buildings. Construction and operations of the project site would not damage or degrade any scenic resources designated by the local jurisdiction. Therefore, the proposed project would not substantially damage scenic resources including, but not limited to, trees, rock outcroppings and historic buildings within a state scenic highway. This topic will not be analyzed in the Draft EIR.

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

Less Than Significant Impact. The proposed project is currently located on primarily flat agricultural land. The proposed project site is bound to the west by the East Highline Canal which supplies the existing agricultural fields with water via a small canal running west through the middle of the proposed reservoir site. An AAC Reach connects to the East Highline Canal approximately 1.6 miles south of the proposed reservoir site, where there is a hydroelectric facility. Holdridge Road, a County dirt road, runs through the middle of the proposed reservoir basin site and will be relocated. The area to the west and south of the proposed reservoir and intake channel consist of similar uses with agricultural fields, the canal system, and two residential units and farming structures. East and northeast of the proposed project site is land owned by BLM, characterized by desert shrubbery and patches of groundcover. The County's General Plan Conservation and Open Space Element identifies the proposed project site to have moderate visual quality, which may include "opportunities for conservation and open space areas" (County of Imperial 2016). With the nearest residential dwelling approximately 150 feet south of the proposed reservoir basin site and a second residential dwelling adjacent to the Holdridge Road which aligns with the

proposed intake channel, construction equipment would only be visible to this dwelling when construction occurs.

The proposed project site would retain a similar visual character as the surrounding uses and would not substantially degrade the existing visual character or quality of the proposed project site and its surroundings. Therefore, construction and operational impacts would be less than significant. This topic will not be analyzed in the Draft EIR.

### d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. Operational and construction lighting would be used for safety and security purposes during nighttime hours. However, all lighting would be directed downward or at a narrow beam angle, in order to focus all light only on the desired area. The proposed project is located in a rural agricultural area within Imperial County. There are no residential dwellings within the proposed project site; however, there is one single-family dwelling located approximately 150 feet south of the proposed reservoir basin site, and a second dwelling unit adjacent to Holdridge Road to the east. The limited lighting during nighttime hours would not be a substantial amount of light that would adversely affect the extremely small number of sensitive receptors in the area. Under operations, the proposed operation of the reservoir and intake channel may generate glare, as the surface of the water in the proposed reservoir would not be covered. Because of the limited lighting, most glare would occur during the daytime hours. However, the design would ensure glare from the proposed reservoir would not be directed towards any sensitive receptors and would be blocked from most sensitive receptors because berms would be approximately ten feet above grade and water levels would be below the elevation of the top of the banks of the proposed reservoir and intake channel. Therefore, construction and operational impacts would be less than significant. This topic will not be analyzed in the Draft EIR.

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### 2.2 Agriculture and Forestry Resources

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II.	AGRICULTURE AND FORESTRY RESO	JRCES – Wou	ld the project:		
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				$\boxtimes$
d)	Result in the loss of forest land or conversion of forest land to non-forest use?				
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?			$\boxtimes$	

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?

Less Than Significant Impact. The proposed project site includes prime farmland and farmland of statewide importance (DOC 2014). The proposed project would develop a main canal off-line reservoir and related infrastructure primarily on agricultural land. Therefore, the portions of the proposed site that the proposed project would occupy would

be converted from operational prime farmland. However, the proposed project is an accessory agricultural use due to its primary purpose of supplying surrounding agricultural uses with water for 12-hour water deliveries or any reductions from the normal 24-hour water delivery period, thereby providing operational flexibility to manage requests for water by agricultural water users, as discussed further in Section 2.11, Land Use and Planning. Thus, the proposed project is consistent with the existing zoning for agricultural use and is a permitted use. Although the proposed project would convert prime farmland and farmland of statewide importance to non-agricultural uses the acreage is negligible and in support of agricultural production. Therefore, impacts would be less than significant. This topic will not be analyzed in the Draft EIR.

### b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

**No Impact.** The proposed project site is zoned as A-2 (General Agriculture) and A-3 (Heavy Agriculture). (County of Imperial 2017.) As stated above, the proposed project is considered an accessory agricultural use due to its primary purpose of supplying surrounding agricultural uses with water for 12-hour water deliveries or any reductions from the normal 24-hour water delivery period, thereby providing operational flexibility to manage requests for water by agricultural water users. Thus, the proposed project is consistent with the existing zoning for agricultural use and is a permitted use. The proposed project site does not include land subject to a Williamson Act contract. (DOC 2013.) Therefore, no impact would occur. This topic will not be analyzed in the Draft EIR.

# c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

**No Impact**. As stated above, the proposed project is considered an accessory agricultural use due to its primary purpose of supplying surrounding agricultural uses with water for 12-hour water deliveries or any reductions from the normal 24-hour water delivery period, thereby providing operational flexibility to manage requests for water by agricultural water users. Thus, the proposed project is consistent with the existing agricultural zoning. The proposed project site is not located on forest land, timberland, or timberland production land as defined in California Public Resources Code Sections 12220(g), 4526, and 51104(g). Therefore, no impact would occur. This topic will not be analyzed in the Draft EIR.

d) Would the project result in the loss of forest land or conversion of forest land to nonforest use?

**No Impact**. The proposed project site is not located on forest land, timberland, or timberland production land, nor would it result in the loss of forest land. Therefore, no impact would occur. This topic will not be analyzed in the Draft EIR.

e) 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 or conversion of forest land to non-forest use?

Less Than Significant Impact. The proposed project includes prime farmland and farmland of statewide importance, but does not include forest land. (DOC 2014.) However, as previously stated, the proposed project is considered an accessory agricultural use due to its primary purpose of supplying surrounding agricultural uses with water for 12-hour water deliveries or any reductions from the normal 24-hour water delivery period, thereby providing operational flexibility to manage requests for water by agricultural water users, as discussed further in Section 2.10. Therefore, the proposed project would have a less than significant impact regarding the conversion of farmlands to a non-agricultural use and no impact regarding the conversion of forest land to a non-forest use. The proposed project would manage fluctuating downstream agricultural water demands due to increases in grower requests for shorter 12-hour water deliveries or any reduction from the normal 24hour water delivery period. Temporarily stored water would be delivered from the proposed reservoir through an automated gate outlet and structure for delivery into the East Highline Canal when downstream demands increase. Implementation of the proposed project would not reduce the water provided to surrounding agricultural uses. Thus, the proposed project would not deter, but rather allow better management of the delivery of water to agricultural uses in the surrounding area. Therefore, impacts would be less than significant. This topic will not be analyzed in the Draft EIR.

### 2.3 Air Quality

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III.	AIR QUALITY –Would the project:				
a)	Conflict with or obstruct implementation of the applicable air quality plan?				
b)	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?				
c)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?				
d)	Expose sensitive receptors to substantial pollutant concentrations?				
e)	Result in other emission (such as those leading to odors) adversely affecting a substantial number of people?				

### a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

**Potentially Significant Impact**. Operations of the proposed project include an operational reservoir and intake channel, which would be un-manned and would utilize gravity for water flows as opposed to pumps. The inlet and outlet gates would require minimal electricity. As such, operations of the proposed project would not conflict with the Imperial County Air Pollution Control District significance thresholds or any air quality plan.

Construction of the proposed project would result in a temporary addition of pollutants to the local airshed caused by soil disturbance, fugitive dust emissions, and combustion pollutants from on-site construction equipment, as well as from off-site trucks hauling construction materials. Construction emissions can vary substantially day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions. The proposed project may exceed the NO<sub>x</sub> ICAPCD significance threshold during construction and may conflict with an applicable air quality plan. Thus,

the proposed project may have a potentially significant impact during construction. Therefore, this topic will be analyzed in the Draft EIR.

b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

**Potentially Significant Impact**. Operations of the proposed project include an operational reservoir and intake channel, which would be un-manned and would utilize gravity for water flows as opposed to pumps. The inlet and outlet gates would require minimal electricity. As such, operations of the proposed project would not violate any air quality standard or substantially contribute to an existing or projected air quality violation.

Construction of the proposed project would result in a temporary addition of pollutants to the local airshed caused by soil disturbance, fugitive dust emissions, and combustion pollutants from on-site construction equipment, as well as from off-site trucks hauling construction materials. Construction emissions can vary substantially day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions. The proposed project may exceed the NOx ICAPCD significance threshold during construction and may potentially violate an air quality standard or contribute substantially to an existing or projected air quality violation. Thus, the proposed project may have a potentially significant impact during construction. Therefore, this topic will be analyzed in the Draft EIR.

c) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?

**Potentially Significant Impact**. Operations of the proposed project include an operational reservoir and intake channel, which would be un-manned and would utilize gravity for water flows as opposed to pumps. The inlet and outlet gates would require minimal electricity. As such, operations of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant.

Construction of the proposed project would result in a temporary addition of pollutants to the local airshed caused by soil disturbance, fugitive dust emissions, and combustion pollutants from on-site construction equipment, as well as from off-site trucks hauling construction materials. Construction emissions can vary substantially day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions. Thus, the proposed project construction may result in a cumulatively

considerable net increase of a criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard. Thus, the proposed project may have a potentially significant impact during construction. Therefore, this topic will be analyzed in the Draft EIR.

#### d) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Operations of the proposed project include an operational reservoir and intake channel, which would be un-manned and would utilize gravity for water flows as opposed to pumps. The inlet and outlet gates would require minimal electricity. As such, operations of the proposed project would not result in substantial pollutant concentrations.

Construction of the proposed project would result in a temporary addition of pollutants to the local airshed caused by soil disturbance, fugitive dust emissions, and combustion pollutants from on-site construction equipment, as well as from off-site trucks hauling construction materials. However, the site and its surroundings are largely unpopulated. There are no residential dwellings within the proposed project site and the nearest, residential dwelling unit is located approximately 150 feet south of the proposed reservoir basin site and a second unit approximately 150 feet east of the proposed intake channel. The limited period of construction would not expose the extremely small number of sensitive receptors in the area to substantial pollutant concentrations. The proposed project would not result in adverse health impacts associated with those pollutants to which the region is in nonattainment. Thus, impacts related to pollutant concentrations from the proposed project would be less than significant and will not be analyzed in the Draft EIR.

#### e) Would the project create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. Construction of the proposed project would result in a temporary addition of pollutants to the local airshed caused by soil disturbance, fugitive dust emissions, and combustion pollutants from on-site construction equipment, as well as from off-site trucks hauling construction materials. Construction emissions can vary substantially day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions. The project design does not include the construction or installation of structures and/or permanent equipment that would release objectionable odors. In addition, the site is surrounded by agricultural fields, with very few sensitive receptors in the surrounding area. Operations of the proposed project include an operational reservoir and intake channel. Thus, operations of the proposed project would not result in objectionable odors. Therefore, impacts would be less than significant related

to objectionable odors affecting a substantial number of people. This topic will not be analyzed in the Draft EIR.

### 2.4 Biological Resources

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV.	<b>BIOLOGICAL RESOURCES</b> – Would the	project:			
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				
c)	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?				
d)	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?				
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				

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.** Potential construction-related direct impacts to special status plants could result during construction from unintentional clearing, trampling, or grading outside of the proposed construction zone. Two types of short-term direct impacts may potentially occur to a candidate, sensitive or special status wildlife species: impacts to habitat and impacts to the species from injury or mortality of individuals of the species.

Operations of the proposed reservoir and intake channel would include conveyance of approximately and up to 1,500 cfs of water via the proposed intake channel route, to the proposed reservoir basin and then delivered into the East Highline Canal. No ground disturbing activities would occur during operations. No separate operations and maintenance facilities would be located on-site. Occasional maintenance would be on an as-need basis, undertaken by IID in accordance with existing practices for inspections and repair. Inspections would be made via crew trucks and using the existing road infrastructure and the proposed maintenance roads constructed around the proposed reservoir and intake channel. Additionally, as no pumping would occur along the intake channel, and on-site operations would be provided, operational noise would not be significant. Thus, the proposed project operations would not have a direct or indirect effect on any candidate, sensitive or special status species. Therefore, operational activities would have a less than significant impact. However, as described above, the proposed project may have a potentially significant impact during construction. If special-status status plants are present on site, the proposed project could result in significant operational-related direct impact to special-status plants. Therefore, this topic will be analyzed in the Draft EIR.

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.** The proposed project has the potential to result in short-term construction-related direct impacts to vegetation communities, including impacts to native vegetation communities from unintentional clearing, trampling, or grading outside of the proposed construction zone. Additionally, temporary direct impacts to habitat may occur from temporary ground-disturbing activities, such as laydown and staging areas.

Operations of the proposed reservoir and intake channel would include conveyance of water via the proposed intake channel route, to the proposed reservoir, and traverse an AAC Drain. The proposed project may have the potential to permanently impact riparian habitat. Thus, operational and construction impacts to riparian or other sensitive natural communities may be potentially significant. Therefore, this topic will be analyzed in the Draft EIR.

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?

**No Impact.** The proposed project site does not contain waters subject to federal jurisdiction under Section 404 of the Clean Water Act and, therefore, the proposed project would not impact or have a substantial adverse effect on federally protected wetland waters. Thus, there would be no impact. Therefore, this topic will not be analyzed in the Draft EIR.

d) Would the project 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?

Less Than Significant Impact. Construction would be temporary at any location, and wildlife would be able to use temporary construction areas freely after work crews are gone. In addition, typical construction methods would not impede wildlife movement over a large area at any one time. Therefore, short-term construction-related impacts to movement of native wildlife species and impediments to the use of native wildlife nursery sites would be less than significant.

The proposed project would be located primarily within an area of open agriculture. Wildlife that currently uses this area for wildlife movement likely uses the native habitat in the northeast portion of the proposed project site outside of the proposed project footprint and adjacent native habitat on BLM land to the east of the proposed project site. These areas would not be impacted by the proposed project. Thus, construction and operations of the proposed project would not result in long-term impacts to wildlife movement through the area. Therefore, this topic will not be analyzed in the Draft EIR.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

**No Impact.** The Imperial County General Plan Conservation and Open Space Element establishes goals and objectives, together with implementation programs and policies related to the protection of threatened or endangered plant and wildlife species and cooperation with federal, state, and local agencies. (Imperial County 2016.) The proposed project does not conflict with the Imperial County General Plan biological resource policies. Thus, no impact would occur. Therefore, this topic will not be analyzed in the Draft EIR.

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?

**No Impact.** The proposed project would not conflict with the goals and policies of the BLM's Desert Renewable Energy Conservation Plan. The proposed project area is not located within any other local, regional, or state conservation planning areas. The proposed project would not conflict with an adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plan. Thus, no impact would occur. Therefore, this topic will not be analyzed in the Draft EIR.

#### 2.5 Cultural Resources

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V.	CULTURAL RESOURCES – Would the pr	roject:			
a)	Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?				
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?				
c)	Disturb any human remains, including those interred outside of formal cemeteries?				

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

**Potentially Significant Impact.** Operations of the proposed project would include an unmanned operational reservoir and intake channel. No groundbreaking activities would result during operations of the proposed project. Construction of the proposed project would include groundbreaking activities as well as connection to the East Highline Canal, which is considered a historic-period resource. Impacts to the East Highline Canal include the cutting of the bank to allow a direct connection to the outlet channel. The cut bank and flow gate would temporarily disturb approximately 150 feet of the East Highline Canal berm.

The proposed intake channel will traverse federal land where a multi-component archaeological site P-13-008653/CA-IMP-8050 has been identified as within the proposed EHL Reservoir Project APE and has the potential to be affected by project activities. During construction, there is also the possibility of impacting inadvertent discoveries of buried archaeological deposits, which could have potentially adverse effects. Thus, the proposed project has the potential to uncover unknown and impact known historical resources during construction activities. Impacts may be potentially significant. Therefore, this topic will be analyzed in the Draft EIR.

### b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

**Potentially Significant Impact.** Operations of the proposed project would include an unmanned operational reservoir and intake channel. No groundbreaking activities would occur during operations of the proposed project. Although the portions of the proposed project site have been previously graded for agricultural purposes including the installation of tile drainage lines installed approximately 8-12' below grade, construction of the proposed project would include groundbreaking activities and, thus, has the potential to uncover unknown archaeological resources during construction activities. Impacts would be potentially significant. Therefore, this topic will be analyzed in the Draft EIR.

### c) Would the project disturb any human remains, including those interred outside of formal cemeteries?

**Potentially Significant Impact.** Operations of the proposed project would include an unmanned operational reservoir and intake channel. No groundbreaking activities would result during operations of the proposed project. Although the portions of the proposed project site have been previously graded for agricultural purposes including the installation of tile drainage lines installed approximately 8-12' below grade, construction of the proposed project would include groundbreaking activities and, thus, has the potential to

uncover unknown human remains during construction activities. Impacts would be potentially significant. Therefore, this topic will be analyzed in the Draft EIR.

### 2.6 Energy

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI.	ENERGY – Would the project:				
a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?				$\boxtimes$
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				$\boxtimes$

## a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

*No Impact.* Operations of the proposed project would include an unmanned operational reservoir and intake channel that largely operate via gravity flow. The automated gates for the proposed Project require normal 240 volt, 3-phase power to be supplied via distribution lines. Two small power generation buildings will be situated on the reservoir embankments for placement of two propane power generators to supply back up power in the event emergency power is required. Portable, 25 kVA Generators to operate dewatering pump systems would be used during temporary construction activities. Thus, the project would not result in any environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources and this item will not be discussed in the Draft EIR.

### b) Would the project Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

**No Impact.** The subject Project site is not designated for siting of renewable energy facilities nor would it conflict or obstruct any state or local plan renewable energy objectives, therefore this item will not be discussed in the Draft EIR.

### 2.7 Geology and Soils

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII	GEOLOGY AND SOILS – Would the project	ect:	T		
a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	<ul> <li>Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.</li> </ul>				
	ii) Strong seismic ground shaking?			$\boxtimes$	
	iii) Seismic-related ground failure, including liquefaction?			$\boxtimes$	
	iv) Landslides?				$\boxtimes$
b)	Result in substantial soil erosion or the loss of topsoil?			$\boxtimes$	
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				
d)	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?				
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				
f)	Directly or indirectly destroy a unique paleontological resources or site or unique geologic feature?				

- a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - i) Rupture of a known earthquake fault, as delineated on the most recent Alquist Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act identifies no active faults within the Bonds Corner Quadrangle within Imperial County, the area in which the proposed project site is located. Therefore, the proposed project would not rupture a known earthquake fault as delineated on the Alquist Priolo Earthquake Fault Zoning Map. Ground-shaking hazards associated with construction of the proposed reservoir and intake channel would be avoided through project design features. Operations of the proposed project would include an un-manned operational reservoir and intake channel. No groundbreaking activities would result during operations of the proposed project. Therefore, impacts associated with fault rupture are expected to be less than significant. This topic will not be analyzed in the Draft EIR.

#### ii) Strong seismic ground shaking?

Less Than Significant Impact. As stated above, the Alquist-Priolo Earthquake Fault Zoning Act identifies no active faults within the Bonds Corner Quadrangle within Imperial County, the area in which the proposed project site is located. However, considering that numerous earthquakes have occurred in Imperial County, potential seismic activity must be considered. Several earthquake faults exist in the County, the nearest being the Imperial Fault, located approximately 5 miles east of the proposed project site. The Imperial Fault is identified as having recent movement within the last 200 years. According to the Seismic and Public Safety Element of the Imperial County General Plan, during the current century, the County has experienced earthquakes of magnitude 6.0 or greater on the Richter scale with the strongest being a magnitude of 7.2 on the Laguna Salada Fault in 2010. Ground shaking hazards during construction of the proposed reservoir and intake channel would be avoided through project design features in accordance with the Uniform Building Code. Operations of the proposed project would include an

un-manned operational reservoir and intake channel. No groundbreaking activities would result during operations of the proposed project. Therefore, impacts associated with seismic ground shaking are expected to be less than significant. This topic will not be analyzed in the Draft EIR.

#### iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. According to the Imperial County General Plan's Seismic and Public Safety Element, the geologically young, unconsolidated sediments of the Salton Trough, which includes the proposed project site, are subject to failure during earthquakes, especially throughout the irrigation portion of the Imperial Valley where the soil is generally saturated (County of Imperial 1993). Liquefaction, and related loss of foundation support, is a common hazard. The proposed project would implement structural design measures during construction that reduce liquefaction risk. Operations of the proposed project would include an un-manned operational reservoir and intake channel. No groundbreaking activities would result during operations of the proposed project. Therefore, impacts associated with liquefaction are expected to be less than significant. This topic will not be analyzed in the Draft EIR.

#### iv) Landslides?

**No Impact.** According to the Imperial County General Plan's Seismic and Public Safety Element, areas in the County that are subject to landslides include the irrigated valley between the East Highline and Westside Main canals and bluffs adjacent to the All-American Canal, Coachella Canal, New River, Alamo River, and Colorado River. The hazardous landslide areas adjacent to these water courses are defined as follows:

- 1. A distance of 50 feet outside of the shaded flood zone areas delineated on the Federal Emergency Management Agency (FEMA) maps for the New and Alamo Rivers
- 2. A distance of one-half the canal bank height beyond the toe of the slope for all of the levee and canal banks

The proposed project site is not within 50 feet of the shaded flood zone area delineated on the FEMA maps for the New and Alamo Rivers. The proposed project would include a main canal off-line operational reservoir project and an intake channel off the east side of the AAC Reach, which would encroach into the designated distance of one-half the canal bank height beyond the toe of the slope of

the AAC Reach. The proposed project site has an average slope of approximately 1 percent. (GoogleEarth 2017.) Therefore, due to the generally flat topography of the proposed project area, the proposed project is not anticipated to be susceptible to landslides and would be constructed in accordance with industry standards. Thus, construction and operational activities for the proposed reservoir basin, intake channel, East Highline Canal connection and the AAC Reach connection would not be at risk of causing landslides. Therefore, no impacts associated with landslides are expected to occur. This topic will not be analyzed in the Draft EIR.

#### b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The proposed project includes ground-disturbing construction activities, including the excavation of a reservoir basin footprint area of 440 acres with a depth of up to approximately 5 feet below grade. Excavated material would be temporarily stored on-site, and then used for the proposed reservoir walls and banks of the intake channel. By reusing the excavated soil, the proposed project would not require the exportation of the soil off-site. Because the proposed project is anticipated to result in a disturbance of more than one acre of land, compliance with the NPDES General Construction Permit would be necessary, as well as preparation of a stormwater pollution prevention plan (SWPPP) that would minimize or eliminate the potential soil erosion that could result from construction. Operations of the proposed project would include an unmanned operational reservoir and intake channel. No groundbreaking activities would result during operations of the proposed project. Therefore, soil erosion and the loss of topsoil resulting from the proposed project would be less than significant. This topic will not be analyzed in the Draft EIR.

## 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?

No Impact. According to the Imperial County General Plan's Seismic and Public Safety Element, the proposed project site is not located in an area subject to landslide, lateral spreading, subsidence, liquefaction, or collapse. (County of Imperial 1993.) The proposed site has previously been developed and disturbed, and there are no known cases of landslide, lateral spreading, subsidence, liquefaction, or collapse occurring on-site. As previously, stated, the proposed project site has an average graded slope of approximately 1 percent. Additionally, the proposed project would not be approved or built without adequately demonstrating compliance with Reclamation requirements and regulations regarding geologic hazards for reservoirs and channels. Reclamation requirements include compliance with exceedance curves, Geotechnical recommendations would be included as

part of project design and construction plans to protect the proposed project from landslides, lateral spreading, subsidence, liquefaction, and collapse. Additionally, prior to construction, a geotechnical recommendations report would be prepared to assess the proposed project's susceptibility to landslides, lateral spreading, subsidence, liquefaction, or collapse. Therefore, by adhering to the geotechnical report and complying with the California Building Code and other applicable geologic regulations, no impact is expected to occur. Operations of the proposed project would include an un-manned operational reservoir and intake channel. No groundbreaking activities would result during operations of the proposed project. Therefore, no impact would occur during operations. This topic will not be analyzed in the Draft EIR.

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?

**No Impact.** Expansive soils contain high levels of clay that expand when wet and contract when dry, which can damage building foundations and other structures. Soils underlying the proposed project area consist of Meloland very fine sandy loams, Meloland and Holtville loams, Rositas fine sand (0 percent to 2 percent slopes), Vint loamy very fine sand, Vint and Indio very fine sandy loams, and water (USDA 2017). As such, approximately 91 percent of the proposed project site is underlain by Rositas fine sand and Vint loamy very fine sand, with the remainder of the proposed site underlain by a combination of Meloland, Holtville, and Indio very fine sandy loams (USDA 2017). These soils within the proposed project area are categorized as well to moderately well drained, which is not indicative of clay soils. Therefore, no impacts associated with expansive soils are expected to occur during construction and operations of the proposed project. This topic will not be analyzed in the Draft EIR.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

**No Impact.** The proposed project does not include septic tanks or alternative wastewater disposal systems; therefore, no impact would occur during construction and operations of the proposed project. This topic will not be analyzed in the Draft EIR.

f) Would the project directly or indirectly destroy a unique paleontological resources or site or unique geologic feature?

Less Than Significant Impact. Concern for paleontological resources is considered to be low due to the construction activities anticipated to be limited to no more than 5 feet below

ground surface. No excavation or ground disturbing activities would occur during operation, therefore this topic will not be analyzed in the Draft EIR.

#### 2.8 Greenhouse Gas Emissions

VIII. GREENHOUSE GAS EMISSIONS – V	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			$\boxtimes$	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				$\boxtimes$

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. Greenhouse gas (GHG) emissions generated during construction of the proposed project would be short-term in nature, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions. Additionally, the proposed project would not conflict with the state's trajectory toward future GHG reductions. The proposed project would result in amortized construction emissions of approximately 52 MT CO2e per year, which is substantially less than various agencies' thresholds. The proposed project's construction GHG emissions are not cumulatively considerable and are considered less than significant. Operations of the proposed project would include an un-manned operational reservoir and intake channel. No groundbreaking activities would result during operations of the proposed project. The inlet and outlet gates would require minimal electricity. As such, operation of the proposed project would not have a significant impact on the environment. Impacts would be less than significant. This topic will not be analyzed in the Draft EIR.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

No Impact. Construction of the proposed project would result in a temporary addition of GHG emissions to the local airshed caused by construction equipment and off-site trucks hauling construction materials. GHG emissions generated during construction of the proposed project would be short-term in nature, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions. The proposed project would not interfere with implementation of any of the previously described GHG reduction goals for 2030 or 2050 because the proposed project's GHG emissions would cease after construction activities have been completed. The proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Thus, there would be no impact from construction and operation of the proposed project. This topic will not be analyzed in the Draft EIR.

#### 2.9 Hazards and Hazardous Materials

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
lx.	HAZARDS AND HAZARDOUS MATERIA	LS - Would the	e project:		
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				
b)	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?				
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				
d)	Be located on a site that 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 Incorporated	Less Than Significant Impact	No Impact
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?				$\boxtimes$
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				

### 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. Operations of the proposed project would include an unmanned operational reservoir and intake channel. Other than the two diesel generators on emergency standby there would be no use of hazardous materials during operations of the proposed project. During construction, there is the potential for short-term use of hazardous materials and fuels including diesel fuel, gasoline, and other oils and lubricants. These hazardous materials would be transported and disposed of in compliance with all current local, state, and federal regulations. The proposed project is located on agricultural land that is currently in use. Construction activities may re-expose pesticides previously used for agriculture. The project site was previously farmed as organic for multiple years. As such, the potential for contamination associated with prior non-organic farming techniques and pesticide use is reduced, but not eliminated. The closest receptors are singlefamily dwellings located approximately 150 feet south of the proposed reservoir location, and adjacent to Holdridge Road which separates the site from the intake channel. Considering the past use of the proposed project site for agriculture, there is the potential to expose previously used pesticides and herbicides, and soil samples may be required. Also, the proposed project site is located in an area favorable to the growth of Valley Fever, a fungus (Coccidioides immitis) that grows in soils in areas of low rainfall, high summer temperatures and moderate winter temperatures. Although Valley Fever has lower rates of reported cases in Imperial County compared to other areas in California, reported cases

have increased moderately since 2012. (Imperial County Public Health Department 2013.) As such, construction activities involving soil-disturbing activities may cause a significant impact. Therefore, this topic will be analyzed in the Draft EIR.

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?

Less Than Significant Impact. Operations of the proposed project include an un-manned operational reservoir and intake channel that will house a diesel generator for use only under emergency conditions (power outages) which are rare. Improper disposal of hazardous materials during construction may cause an accidental release of hazardous materials into the environment. Compliance with standard California Department of Pesticide Regulation practices to inspect equipment for leaks and promptly respond to any minor spill of fuel or oil would ensure that the potential impact of the proposed project is less than significant. This topic will not be analyzed in the Draft EIR.

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?

Less Than Significant Impact. Operations of the proposed project include an un-manned operational reservoir and intake channel. The proposed project is not located within one-quarter mile of an existing or proposed school. The closest school to the proposed project site is Holtville Middle School, located approximately 7.5 miles to the northwest. Therefore, the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No construction or operational impacts would occur. This topic will not be analyzed in the Draft EIR.

d) Would the project be located on a site that 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?

**No Impact.** The proposed project site is not designated as a hazardous materials site on the Cortese List, and is not included on any state or federal list of potentially hazardous materials. (DTSC 2021.) There are no sites within 1,000 feet of the proposed project site mapped on the Department of Toxic Substance Control's EnviroStor database (DTSC 2021). Therefore, the proposed project would have no impact related to location on a listed hazardous materials site. This topic will not be analyzed in the Draft EIR.

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?

**No Impact.** The proposed project is not located within two miles of a public airport or public use airport. The nearest operating public airport is the Calexico International Airport, 13.7 miles southwest of the proposed project site. Therefore, no impact would occur. This topic will not be analyzed in the Draft EIR.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

*No Impact*. The proposed project would be consistent with the Imperial County Operational Area Emergency Operations Plan. Therefore, no impacts would occur. This topic will not be analyzed in the Draft EIR.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant Impact. The California Department of Forestry and Fire Protection (CAL FIRE) identifies the proposed project site and surrounding areas as having a moderate risk for fire danger. The proposed project site and surrounding areas would be serviced by fire protection agencies, including the Imperial County Fire Department. Construction equipment and activities would comply with State Building Construction Regulations, which minimizes fire risk related to construction activities. Operations of the proposed project would consist of a reservoir and intake channel, and would not introduce any people or residences to the area. As such, it is unlikely that the proposed project would 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. Therefore, impacts would be less than significant. This topic will not be analyzed in the Draft EIR.

### 2.10 Hydrology and Water Quality

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X.	HYDROLOGY AND WATER QUALITY –	Would the proje	ect:		
a)	Violate any water quality standards or waste discharge requirements or otherwise degrade surface or groundwater quality?				
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, through the addition of impervious surfaces in a manner which would:				
	<ul> <li>i. Result in substantial erosion or siltation on- or off-site:</li> </ul>				
	<ul> <li>ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;</li> </ul>				
	iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				
	iv.Impede or redirect flood flows?				
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?				$\boxtimes$
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable management plan?				$\boxtimes$

a) Would the project violate any water quality standards or waste discharge requirements or otherwise degrade surface or groundwater quality?

Less Than Significant Impact. The proposed project includes the construction of an offline reservoir on a parcel of agricultural land, planned to manage fluctuating downstream water demands. Construction of the proposed project could create the potential for erosion during excavation. However, construction activities would be subject to applicable requirements of the Colorado River Basin Regional Water Quality Control Board (RWOCB) with respect to control of surface erosion, sedimentation, and runoff quality. Additionally, accidental release, through mishap or improper maintenance of equipment, of fuels, oils, lubricants and other hazardous substances used during construction may impact surface water quality or waste discharge requirements. However, to prevent such accidental releases, the proposed project would be required to comply with the NPDES State Water Resources Control Board Construction General Permit Order No. 2009-0009-DWQ for stormwater discharges and general construction activities, and incorporate standard BMPs such as regular cleaning or sweeping of construction areas and impervious areas, and various stormwater BMPs. A water management plan must describe the type, location and function of structural measures to alleviate stormwater impacts and must demonstrate that the combination of measures selected are adequate to meet the discharge prohibitions, effluent standards, and receiving water limitations contained in the Construction General Permit. This would ensure that construction impacts would be less than significant. As such, through compliance with construction regulations, impacts to water quality and waste discharge requirements would be less than significant. Operations of the proposed project would include an un-manned lined operational reservoir and intake channel, so the proposed project would not violate water quality standards or waste discharge requirements. No groundbreaking activities would occur during operations of the proposed project. This topic will not be analyzed in the Draft EIR.

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

**No Impact.** The proposed project would not use local groundwater supplies for construction or operation. Construction of the proposed reservoir and intake channel would require soil excavation of approximately 5 feet below grade. Groundwater would not be affected at this depth. Any amount of water used for construction will be surface water delivered through IID's conveyance system. The proposed project will convey and manage surface water only. The proposed reservoir and intake channel would be lined. Therefore, water flowing through the proposed intake channel and proposed reservoir would not seep into the underlying soils to reach groundwater. Therefore, construction and operations of the

proposed project would not interfere with groundwater resources or local groundwater recharge. No construction or operational impacts to groundwater would occur. This topic will not be analyzed in the Draft EIR.

- 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, through the addition of impervious surfaces in a manner which would:
  - i. Result in substantial erosion or siltation on or off-site;
  - ii. Substantially increase the rate or amount of surface run-off in a manner which would result in flooding on-or off-site;
  - iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
  - iv. Impede or redirect flood flows?

No Impact. Operations of the proposed project would consist of a main canal off-line operational reservoir and intake channel. A proposed intake channel off the east side of the AAC Reach would direct Colorado River water supplies through the proposed intake channel to the proposed reservoir. The existing canal and drainage infrastructure is manmade and would not be considered a natural drainage pattern for the area. The existing canal infrastructure is not a stream or river and no streams or rivers are located on or near the area of the proposed project site. The proposed project is located in a desert climate with no perennial or seasonal streams or rivers on or near the proposed project site. The proposed project site consists of flat agricultural land, with man-made tile drainage lines installed approximately 8-12' below grade to route agricultural runoff to IID's existing drainage system, and semi-disturbed desert areas, in which surface runoff would drain to shallow depths and evaporate. Therefore, the construction and operations of the proposed project would not result in erosion or siltation on or offsite, would not alter existing drainage patterns that would result in flooding or impede or redirect flood flows nor will it contribute to runoff water on or near the proposed project site and will not result in substantial erosion or siltation on- or off-site. Therefore, no impact would occur because of the proposed project. This topic will not be analyzed in the Draft EIR.

d) Would the project be placed in flood hazard, tsunami, or seiche zones risk relasease of pollutants due to project inundation?

**No Impact.** The proposed project site is approximately 108 miles inland from the Pacific Ocean, 35 miles from the Salton Sea and would not be subject to inundation by tsunami. Given that the proposed project site is not located near a large standing body of water (the

nearest is the Salton Sea, approximately 35 miles away), inundation by seiche (or standing wave) is negligible. As discussed in Section 2.7, Geology and Soils, the proposed project site is generally flat with no steep slopes and does not contain slopes subject to potential landslide or mudflows. Therefore, no impact would occur related to construction and operations of the proposed project. According to Flood Insurance Rate Map Number FM06025C2125C, the Department of Water Resources and the County General Plan, the proposed project site is not located within a flood hazard area. (DWR 2016; FEMA 2016; County of Imperial 1993, Figure 4.) Therefore, no impact would occur. This topic will not be analyzed in the Draft EIR.

### e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable management plan?

**No Impact.** The proposed Project site are fallowed agricultural lands and withdrawn lands for use exclusively by Reclamation for water management purposes. Although Imperial County does have a Groundwater Management Ordinance, the proposed construction and operation of the project will not impact any groundwater resources. Therefore, the proposed Project would not conflict or obstruct implementation of the County's groundwater management ordinance.

At the time that construction is proposed, IID will apply for a Water Quality Certification from the Colorado River Basin Regional Water Quality Control Board (to which federal authority under the Clean Water Act relevant to water quality is delegated to authorize construction across the approximately 0.21 acres of state jurisdictional wetlands (All American Drain 2/2A Seepage Recovery Drain). Therefore, the project will not obstruct implementation of any water quality control plan or sustainable management plan and this topic will not be analyzed in the Draft EIR.

#### 2.11 Land Use and Planning

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI.	XI. LAND USE AND PLANNING – Would the project:				
a)	Physically divide an established community?				
b)	Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				

#### a) Would the project physically divide an established community?

No Impact. The proposed project would be located on a site that is currently used for agricultural purposes, with the exception of three acres of the intake channel, which crosses Reclamation land. The surrounding land uses include agricultural land to the south, west, and northwest, and lands to the northeast and east are BLM desert lands. The closest residential dwellings are located approximately 150 feet south of the proposed reservoir site, and approximately 150 feet east of the southwestern-most point of the intake channel, across Holdridge Road. The agricultural lands in the proposed project region are sparsely populated, and the open desert areas managed by BLM are not populated. As such, the proposed project region would not be considered an established community and, therefore, implementation of the proposed project would not physically divide an established community. Therefore, no impact would occur related to construction and operation of the proposed project. This topic will not be analyzed in the Draft EIR.

## b) Would the project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

**No Impact.** Except for the portion of the proposed project site located on Reclamation land, the proposed project site is currently designated by the General Plan Land Use Element as "Agriculture." (County of Imperial 2015.) That portion of the proposed project site is currently zoned as A-2 (General Agriculture) and A-3 (Heavy Agriculture). (County of

Imperial 2017.) The proposed project would be consistent with the County Zoning Ordinance as it would support agricultural production. The A-2 zone permitted uses include agricultural accessory structure(s), buildings, and uses. (County of Imperial 1998.) The A3 zone permitted uses include miscellaneous uses including water storage or groundwater recharge facilities, and water systems. (County of Imperial 1998.) The proposed project would include the construction of an operational reservoir with the primary purpose of managing water supplies for the agricultural uses within the IID service area. Therefore, the proposed reservoir would act as an accessory agricultural structure and use and a short-term water storage facility as it retains water for a short period of time until the water is delivered to agricultural water users. The proposed project, therefore, does not conflict with any applicable land use plan and policy, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, no impact would result from the proposed project. This topic will not be analyzed in the Draft EIR.

#### 2.12 Mineral Resources

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII	XII. MINERAL RESOURCES – Would the project:				
a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				$\boxtimes$
b)	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				

# 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?

**No Impact.** The proposed project is located in Imperial County, in which no Surface Mining and Reclamation Act (SMRA) Classification has occurred. The proposed project site is not located in a Mineral Land Classification Study Area. There are no anticipated known mineral resources within the proposed project site, and no evidence exists indicating that there could be mineral resources in the proposed project vicinity. (County of Imperial 2016.) Therefore, construction and operations of the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the state.

Therefore, no impact would occur because of the proposed project. This topic will not be analyzed in the Draft EIR.

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, or other land use plan?

**No Impact.** The County General Plan's Conservation and Open Space Element does not identify any zones of locally important mineral resources. (County of Imperial 2016.) Mineral extraction land uses would be incompatible with the existing and planned land uses within and around the proposed project site. Therefore, no impact to locally important mineral resources would occur because of the proposed project. This topic will not be analyzed in the Draft EIR.

#### 2.13 Noise

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			$\boxtimes$	
b) Generation of excessive groundborne vibration or groundborne noise levels?				
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				

a) Would the project result in the generation of a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact. The proposed project would result in a temporary increase in noise levels during construction due to the transport of workers and equipment, and

short-term daytime project construction activities. In accordance with the County's Noise Element, construction noise from a single piece of equipment or a combination of equipment shall not exceed 75 dB L<sub>eq</sub> when averaged over a one-hour period. Construction equipment operation shall be limited to the hours of 7 a.m. to 7 p.m., Monday through Friday, and 9 a.m. to 5 p.m. Saturday. No commercial construction operations are permitted on Sunday or holidays.

The Federal Highway Administration's (FHWA) Roadway Construction Noise Model (RCNM) is used to estimate construction noise levels from locations adjacent to the nearest noise-sensitive land uses. From the nearest residence (measured from the nearest occupied residence to the proposed project basin boundary), noise levels would not exceed 74 dBA Leq during construction phases. Typically, the noise from construction would be substantially lower than the maximum level. Generally, construction noise is estimated to be in the range of 63 to 64 dBA Leq. Therefore, noise levels would not exceed the established standards in the General Plan and no impact would occur.

Once operational, the proposed project would consist of the reservoir and intake channel with automated gates, which would not generate noise levels in excess of established standards. Furthermore, the proposed project will only have staff on site occasionally for maintenance purposes. Therefore, operational noise impacts would not exceed the established standards in the General Plan and any noise impacts would be temporary and less than significant. This topic will not be analyzed in the Draft EIR.

## b) Would the project result in the generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. During construction, the proposed project would have the potential to increase groundborne vibration in the area due to the presence of construction equipment. The magnitude of the increases would depend on the type of construction activity, the vibration levels generated by various pieces of construction equipment, site geometry (i.e., shielding from intervening terrain or other structures), and the distance between the vibration source and the nearest receivers. Pile driving, blasting, or other special construction techniques would not be used for construction of the proposed project. Thus, the proposed project would result in less than significant impacts from excessive ground-borne vibration and ground-borne noise during construction. Once operational, the proposed project would consist of a main canal off-line operational reservoir and intake channel. No components of operations or maintenance of the proposed project would generate groundborne vibration or groundborne noise levels. Thus, this topic will not be analyzed in the Draft EIR.

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

**No Impact**. The proposed project is not located within the authority of an airport land use plan or within 2 miles of a private airstrip. Therefore, no impact would occur with the proposed project. This topic will not be analyzed in the Draft EIR.

## 2.14 Population and Housing

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	
XI\	XIV. POPULATION AND HOUSING – Would the project:					
a)	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)?					
b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?					

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)?

**No Impact**. Construction of the proposed project would require construction workers in all phases of construction. Construction workers are anticipated to live within the existing residential areas in the greater Imperial County area. Therefore, construction of the proposed project would not generate substantial population growth.

The proposed project would involve the operation of an up to 3,400-acre-foot reservoir to provide operational water flexibility to facilitate more efficient delivery of water to farmers and support on-farm conservation practices. The raw Colorado River water retained at the proposed reservoir would be delivered to agricultural uses. IID does not provide treated water services. The proposed project will not increase the water supply, but rather will allow for the management of requests from agricultural water users for shorter 12-hour water deliveries or any reductions from the normal 24-hour water delivery period.

Therefore, the proposed project would not induce population growth in the area. The proposed project would not remove an impediment to growth to the surrounding area by improving infrastructure. The proposed project would have no components that would induce population growth. Therefore, no impacts would occur because of the proposed project. This topic will not be analyzed in the Draft EIR.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

**No Impact.** The proposed project site primarily consists of active agricultural land. There are no existing residential uses or dwellings on the proposed project site. Therefore, the proposed project would not displace any existing people or housing. Therefore, no impact would occur because of the proposed project. This topic will not be analyzed in the Draft EIR.

#### 2.15 Public Services

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	
XV. PUBLIC SERVICES					
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:					
i. Fire protection?					
ii. Police protection?			$\boxtimes$		
iii. Schools?				$\boxtimes$	
iv. Parks?				$\boxtimes$	
v. Other public facilities?				$\boxtimes$	

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

#### Fire protection?

Less Than Significant Impact. The proposed project consists of a main canal off-line operational reservoir and intake channel. The proposed project is an operational water infrastructure facility and, therefore, would not introduce any people or residences to the area. Construction activities may result in an increased need for fire protection in the area due to the increase in personnel at the proposed project site for construction. However, compliance with local, state, and federal fire regulations during construction activities would minimize the need for fire protection services. Operation of the proposed project would not increase fire protection demand in the area. Impacts would be less than significant. This topic will not be analyzed in the Draft EIR.

#### Police protection?

Less Than Significant Impact. The proposed project consists of a main canal off-line operational reservoir and intake channel. The proposed project is an operational water infrastructure facility and, therefore, would not introduce any people or residences to the area that would create a police protection demand. Construction activities may result in a temporary increased need for law enforcement services due to the increase in personnel and construction related equipment and traffic on and around the proposed project site. However, compliance with local, state, and federal traffic and building regulations during construction activities would minimize the need for police services. Operation of the proposed project would not necessitate police protection in the area. Impacts would be less than significant. This topic will not be analyzed in the Draft EIR.

#### Schools?

**No Impact.** The proposed project consists of a main canal off-line operational reservoir and intake channel. The proposed project is an operational water infrastructure facility and, therefore, would not introduce any people or residences to the area. The water retained at the proposed reservoir would be delivered to agricultural uses and IID does not provide treated water service. Therefore, the proposed project would not induce population growth in the area. Operation of the proposed project would not adversely affect schools in the area. Therefore, no impacts would occur because of the proposed project. This topic will not be analyzed in the Draft EIR.

#### Parks?

**No Impact.** The proposed project consists of a main canal off-line operational reservoir and intake channel. The proposed project is an operational water infrastructure facility and, therefore, would not introduce any people or residences to the area. The water retained at the proposed reservoir would be delivered to agricultural uses. IID does not provide treated water service. Therefore, the proposed project would not induce population growth in the area. Operation of the proposed project would not adversely affect park facilities. Therefore, no impacts would occur because of the proposed project. This topic will not be analyzed in the Draft EIR.

#### Other public facilities?

**No Impact.** The proposed project consists of a main canal off-line operational reservoir and intake channel. The proposed project is an operational water infrastructure facility and, therefore, would not introduce any people or residences to the area. The water retained at the proposed reservoir would be delivered to agricultural uses. IID does not provide treated water service. Therefore, the proposed project would not induce population growth in the area. Operation of the proposed project does not affect other public facilities, such as libraries and hospitals in the area. Therefore, no impacts would occur because of the proposed project. This topic will not be analyzed in the Draft EIR.

#### 2.16 Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION				
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?				
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				

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?

**No Impact.** Operation of the proposed project consists of a main canal off-line operational reservoir and intake channel, which would be un-manned. Construction of the proposed project would require construction workers in all phases of construction. Construction workers are anticipated to live within the existing residential areas in the greater Imperial County area. Therefore, construction of the proposed project is not expected to generate population growth. The proposed project would not introduce a new population to the area, and thus would not increase the use of existing neighborhoods, regional parks, or other recreational facilities. Therefore, no impacts would occur because of the proposed project. This topic will not be analyzed in the Draft EIR.

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

**No Impact.** The proposed project would not introduce a new population to the area, and thus would not require the construction or expansion of recreational facilities. Additionally, the proposed project does not include any recreational facilities. Therefore, no impacts would occur because of the proposed project. This topic will not be analyzed in the Draft EIR.

## 2.17 Transportation and Traffic

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV		ıld the project:	T		
a)	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?				
b)	Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?				
c)	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?				
d)	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			$\boxtimes$	
e)	Result in inadequate emergency access?			$\boxtimes$	
f)	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?				

a) Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into

account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

No Impact. The proposed project is located approximately 2.3 miles south of I-8, approximately 0.9 miles east of Miller Road, and approximately 1.2 miles north of State Route 98, in Imperial County. The proposed reservoir basin is bordered to the south by Verde School Road. Holdridge Road is a narrow, County dirt road that runs north—south through the proposed basin site. Holdridge Road currently facilitates very few users. With construction of the proposed project, Holdridge Road would be redirected to run along the western perimeter of the proposed reservoir. Approximately a quarter of a mile would be added to Holdridge Road with the proposed realignment. Considering the insignificant change in existing roadways, and the current level of usage of Holdridge Road, the proposed project would not cause a significant change in the level of service or performance of the circulation system. Bornt Road would continue to be accessible off of SR 98.

Construction workers are anticipated to live within the existing residential areas in the greater Imperial County area. The anticipated number of construction workers during construction phases of the proposed project would average 20 workers on any given day resulting in approximately 40 daily trips. The number of construction workers and trips is not high enough to result in the reduction of the effectiveness or performance of the existing circulation system in the proposed project vicinity. Operation of the proposed project would be unmanned, thus would not result in additional daily trips to the proposed project site, other than periodic inspections and maintenance.

The County General Plan's Circulation and Scenic Highway Element contains goals and objectives to provide direction for private development as well as government actions and programs. The proposed project would include an onsite driveway located off Holdridge Road allowing access to the proposed project site. The proposed driveway is not anticipated to affect existing traffic because existing traffic volumes in the vicinity are so low. The proposed project would not conflict with the goals and objectives of the Circulation and Scenic Highway Element as the proposed project would not result in population growth, new construction, or any other changes that would affect the performance of the circulation system. (County of Imperial 2008a.) Therefore, no impacts would result because of the proposed project. This topic will not be analyzed in the Draft EIR.

b) Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

**No Impact.** The proposed project consists of a main canal off-line operational reservoir and intake channel. Thus, the proposed project would introduce a negligible amount of new traffic to the area. The proposed project would not result in population growth, new housing construction, or any other changes that would affect traffic. (County of Imperial 2013.) As such, the proposed project would not conflict with the Imperial County Long Range Transportation Plan adopted in 2013. (2013 Transportation Plan.) Therefore, no impacts would result and this topic will not be analyzed in the Draft EIR.

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?

**No Impact.** The proposed project consists of a main canal off-line operational reservoir and intake channel. The nearest airports are the Holtville Airport, approximately 7.5 miles north of the proposed project site, and the Calexico International Airport, approximately 14 miles to the west-southwest of the proposed project location. The Holtville Airport, an abandoned military airfield is no longer in use and does not have a Compatibility Map. The proposed project is not within Calexico International Airport Compatibility Map's range. (Calexico International Airport 2017.) Thus, the proposed project would not change air traffic patterns or result in substantial safety risks regarding air traffic. Therefore, no impact would occur because of the proposed project. This topic will not be analyzed in the Draft EIR.

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)?

Less Than Significant Impact. With implementation of the proposed project, Holdridge Road would be redirected to run along the western perimeter of the proposed reservoir. Approximately a quarter of a mile would be added to Holdridge Road with the proposed realignment. Considering the insignificant change in existing roadways and the current level of usage of Holdridge Road, the proposed project would not cause a substantial change in the level of service. The realignment of Holdridge Road would be constructed in accordance with the County's Standards and Design Guidelines for Street Improvements and would not increase hazards due to a design feature. (County of Imperial 2008b.) The proposed project does not include any off-site roadway improvements. Occasional maintenance would be on an as-need basis, undertaken by IID in accordance with existing practices for inspections and repair. Inspections would be made via crew trucks and using the existing road infrastructure and the proposed maintenance roads constructed around the proposed reservoir and intake channel. Such use would be compatible with surrounding uses. Thus, the proposed project is not expected to result in hazards due to a design feature

or incompatible use. Therefore, impacts would be less than significant. This topic will not be analyzed in the Draft EIR.

#### e) Would the project result in inadequate emergency access?

No Impact. No additional emergency access roads would be constructed in the proposed project area as the operation of the reservoir facility would be unmanned. Additionally, the proposed project would not block any existing roadways including emergency access roads. The proposed intake channel would cross beneath Born road via underground culverts. Emergency access from the project site during construction and maintenance activities would be facilitated via Holdridge Road and Bornt Road. As previously stated, construction of the proposed project would result in an average of 20 workers on any given day. The number of construction workers and trips is not high enough to result in the reduction of the effectiveness or performance of the existing circulation system in the proposed project vicinity. Therefore, the proposed project would not result in inadequate emergency access; no impact would occur. This topic will not be analyzed in the Draft EIR.

# f) Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

**No Impact**. The proposed project would not conflict with the Imperial County's 2013 Transportation Plan, including public transit, bicycle, or pedestrian facilities objectives, because the proposed project would not result in population growth, new construction, or any other changes that would affect traffic. Therefore, no impacts would result because of the proposed project. This topic will not be analyzed in the Draft EIR.

#### 2.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES - W	ould the projec	ct:		
<ul> <li>a) Cause a substantial adverse change in the Public Resources Code §21074 as eit geographically defined in terms of the size cultural value to a California Native Americ</li> </ul>	her a site, for	eature, place, c the landscape, s	cultural landsc	ape that is
<ul> <li>Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined Public Resources Code Section 5020.1(K), or</li> </ul>	$\boxtimes$			
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC section 5020.1(k)?

**Potentially Significant Impact.** Operation of the proposed project would include an unmanned operational reservoir and intake channel. No groundbreaking activities would occur during operation of the proposed project that would potentially impact historical resources. Therefore, no impact would occur during operation of the proposed project.

A search of the Native American Heritage Commission (NAHC) Sacred Lands File was conducted for the proposed project and a one-mile buffer on April 10, 2017. The NAHC search was negative, with no Tribal Cultural Resources (TCRs) located in the area of potential effect (APE). Two previously identified built environment resources were identified within the proposed APE during the records search: the All-American Drain 2/2A was previously found eligible for listing in the NRHP as a contributor to the AAC historic district and the East Highline Canal was recorded but not formally evaluated for historic

significance. Also previously identified was a multi-component archaeological site that is within the proposed EHL Reservoir Project APE and is recommended eligible for inclusion on the NRHP. Considering that the proposed project would include groundbreaking activities and directly connect to the East Highline Canal and Traverse the All-American Drain 2/2A, there is the possibility of impacting these resources and other inadvertent discoveries of buried archaeological deposits, which could have potentially adverse effects. Therefore, the proposed project has the potential to unearth unknown tribal cultural resources during construction. Impacts would be potentially significant. This topic will be analyzed in the Draft EIR.

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) PRC section 5024.1?

**Potentially Significant Impact.** Assembly Bill 52 was passed in 2014 and took effect July 1, 2015. It established a new category of environmental resources that must be considered under CEQA called tribal cultural resources (Public Resources Code 21074) and established a process for consulting with Native American tribes and groups regarding those resources. Assembly Bill 52 requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. IID has consulted with appropriate tribes with the potential for interest in the region. Additionally, Reclamation assumed the lead for Tribal Consultation through the EA process.

Operation of the proposed project would include an un-manned operational reservoir and intake channel. No groundbreaking activities would occur during operation of the proposed project that would potentially impact historical resources. Therefore, no impact would occur during operation of the proposed project. However, construction of the proposed project would include groundbreaking activities. Therefore, the proposed project has the potential to unearth unknown tribal cultural resources during construction. Impacts would be potentially significant. This topic will be analyzed in the Draft EIR.

## 2.19 Utilities and Service Systems

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX	(. UTILITIES AND SERVICE SYSTEMS – \	Nould the proje	ect:		
a)	Require or result in the construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?				
b)	Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?				
c)	Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?				
d)	Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			$\boxtimes$	
e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				

a) Would the project require or result in the construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?

**No Impact.** Construction of the proposed project would require construction workers in all phases of construction. Any surface runoff on the proposed project site would drain into IID's existing drainage system or to shallow depths and evaporate. Temporary portable restrooms would be provided on-site and would be taken off-site by a third party. The proposed project would not introduce a new population to the area because no operational

workers would be required for the proposed project. Therefore, no demand would be created for any water, wastewater, stormwater drainage, natural gas or telecommunication facilities would be required. Electrical demand would be within available resources and existing distribution lines. No impact would occur because of the proposed project to existing or expanded facilities. This topic will not be analyzed in the Draft EIR.

b) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

**No Impact.** During construction, water trucks would be brought onsite to be used for construction water needs such as dust management. No operational workers would be required for the proposed project. Therefore, no on-site water demands would be generated. The proposed project would not introduce a new population to the area. Thus, the proposed project would not increase demands for water supplies, rather it would assist in the management of existing Colorado River water supplies, allow greater flexibility for agricultural water deliveries and facilitate on-farm and system efficiency conservation projects for conservation and augmentation of up to 15,000 acre-feet per year. No impact would result. This topic will not be analyzed in the Draft EIR.

c) 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?

**No Impact.** As previously stated, construction of the proposed project would require construction workers in all phases of construction. Temporary portable restrooms would be provided on-site and would be taken off-site by a third party. The proposed project would not introduce a new population to the area because the proposed project consists of a main canal off-line operational reservoir and intake channel. Thus, the proposed project would not increase the amount of wastewater produced in the area and the proposed project would not need wastewater treatment services. Therefore, no impact would occur because of the proposed project. This topic will not be analyzed in the Draft EIR.

d) Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

**Less Than Significant Impact.** Construction waste would be taken to the Holtville SWS landfill, which has the capacity for the anticipated construction waste. The excavated soil from the construction of the proposed reservoir and intake channel would be used to form the embankments surrounding these water features for a less than significant impact.

No waste would be generated during operations of the proposed project as the proposed project would be un-manned and would not introduce a new population to the area. Thus, the proposed project would not increase the generation of solid waste in the area. No operational impact would occur because of the proposed project. This topic will not be analyzed in the Draft EIR.

## e) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

**No Impact.** As previously stated, construction waste would be taken to the Holtville SWS landfill, which has the capacity for the anticipated construction waste. The proposed project would not introduce a new population to the area because the proposed project consists of a main canal off-line operational reservoir and intake channel. Thus, the proposed project would not increase the generation of solid waste in the area. Additionally, disposal of solid waste generated during construction would not conflict with federal, state, and local statutes and regulations related to solid waste. Therefore, no impact would occur because of the proposed project. This topic will not be analyzed in the Draft EIR.

#### 2.20 Wildfire

VV	WIII DEIDE - If located in an accordate w	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
^^	. WILDFIRE – If located in or near state re hazard severity zones, would the project		ireas or iand cia	issilieu as ver	y nigh lire
		NOT.	APPLICABLE T	O THIS PROJ	ECT
a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?				
b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?		₽	⊟	
c)	Require the installation or maintenance of associated infrastructure (such as roads fuel breaks, emergency water sources, power lines or other utilities that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment?				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Ф	□	Ф	

*a)-d)* CAL FIRE adopts Fire Hazard Severity Zone maps for State Responsibility. According to the Fire Hazard Severity Zone Map for the Imperial County State Responsibility Area there are no zones within the Project area or vicinity nor classified as Moderate, High or Very High fire hazard risks as of June 15, 2023.

## 2.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIF	ICANCE			
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, eith directly or indirectly?	er			

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

**Potentially Significant Impact.** Operation of the proposed reservoir and intake channel would not include groundbreaking activities. Therefore, the proposed project would not substantially degrade the quality of the environment. However, construction of the proposed project would include groundbreaking activities in an area with the potential for sensitive species and historical or cultural resources. As such, impacts may be potentially significant. This topic will be analyzed in the Draft EIR.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

**Potentially Significant Impact**. Operation of the proposed project include an un-manned operational reservoir and intake channel, which would utilize gravity for water flows as opposed to water pumping. The inlet and outlet gates would require minimal electrical power. As such, operations of the proposed project would not result in cumulatively considerable environmental impacts.

Construction of the proposed project may result in a temporary addition of pollutants to the local airshed caused by soil disturbance, fugitive dust emissions, and combustion pollutants from on-site construction equipment, as well as from off-site trucks hauling construction materials in an area that is currently identified as non-attainment under an applicable federal or state ambient air quality standard. Therefore, the proposed project would have the potential to contribute to a cumulatively considerable air quality impact related to

criteria pollutants. Impacts may be potentially significant. This topic will be analyzed in the Draft EIR.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

**Potentially Significant Impact.** As previously discussed, operation of the proposed project is that of an un-manned operational reservoir and intake channel. Construction of the proposed project would include the use of equipment that would produce air pollutant emissions. The contribution of air pollutant emissions to the airshed has the potential to have an adverse effect on human beings. In addition, temporary impacts may occur as a result of construction activities which have the potential to adversely affect human beings. Thus, impacts may be potentially significant. This topic will be analyzed in the Draft EIR.

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#### 3 REFERENCES AND PREPARERS

#### 3.1 References Cited

- 14 CCR 15000–15387 and Appendices A through L. Guidelines for Implementation of the California Environmental Quality Act, as amended.
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## 3.2 List of Preparers

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CR S28 E Evan Hewes Hwy  $\Rightarrow$ Calexico Mexico Mexicali 2.5 5 Miles Imagery provided by Esri and its licensors © 2020. Action Area San Diego

Figure 1-1 Project Regional Location

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Figure 1-2 Conceptual Layout

