
***Initial Study / Mitigated Negative Declaration
for:
92-kV CA Line Upgrade Project***

**Prepared By:
Ericsson-Grant, Inc.
315 South Coast Highway, Suite U277
Encinitas, CA 92024**

Prepared For:



**333 Barioni Boulevard
Imperial, CA 92251**

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APPENDICES

Appendix A: Biological Resource Assessment for the Line Replacement Project, Imperial Irrigation District, 92KV Transmission Line Upgrade North View Substation to Avenue 42 Substation, Indio, California.

Appendix B: Cultural Resource Assessment for the Proposed Imperial Irrigation District Project.

SECTION 1

I. INTRODUCTION

A. PURPOSE

This document is a ☐ policy-level, ☒ project level Initial Study for evaluation of potential environmental impacts resulting from construction of the proposed CA 92-kV Line Upgrade Project.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REQUIREMENTS

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

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

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

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

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

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

The IID is designated Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the principal responsibility for approving the necessary environmental clearances and analyses for the project.

B. INTENDED USES OF INITIAL STUDY

This Initial Study is an informational document which is intended to inform the IID decision makers, other responsible or interested agencies, and the general public of potential environmental effects of the proposed applications. The environmental review process has been established to enable public agencies to evaluate environmental consequences and to examine and implement methods of eliminating or reducing any potentially

adverse impacts. While CEQA requires that consideration be given to avoiding environmental damage, the Lead Agency and other responsible public agencies must balance adverse environmental effects against other public objectives, including economic and social goals.

The Initial Study prepared for the project will be circulated for a period of 35 days for public and agency review and comments. At the conclusion, if comments are received, the IID will prepare a document entitled "Responses to Comments" which will be forwarded to any commenting entity and be made part of the record within 10-days of any project consideration.

C. CONTENTS OF INITIAL STUDY

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

SECTION 1

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

SECTION 2

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

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

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

SECTION 3

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

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

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

- VI. FINDINGS**

SECTION 4

VIII. RESPONSE TO COMMENTS (IF ANY)

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

D. SCOPE OF ENVIRONMENTAL ANALYSIS

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

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

E. POLICY-LEVEL or PROJECT LEVEL ENVIRONMENTAL ANALYSIS

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

F. TIERED DOCUMENTS AND INCORPORATION BY REFERENCE

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

1. Tiered Documents

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

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

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

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

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

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

- (1) Were not examined as significant effects on the environment in the prior EIR; or
- (2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means."

2. Incorporation by Reference

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

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

- The incorporated document must be available to the public or be a matter of public record (CEQA Guidelines Section 15150[a]). This document must be available for inspection by the public at an office of the lead agency (CEQA Guidelines Section 15150[b]).
- These documents must summarize the portion of the document being incorporated by reference or briefly describe information that cannot be summarized. Furthermore, these documents must describe the relationship between the incorporated information and the analysis in the tiered documents (CEQA Guidelines Section 15150[c]). As discussed above, the tiered EIRs address the entire project site, provide background, and inventory information and data which apply to the project site. Incorporated information and/or data will be cited in the appropriate sections.
- These documents must include the State identification number of the incorporated documents (CEQA Guidelines Section 15150[d]).

The material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]). This has been previously discussed in this document.

SECTION 2

II. ENVIRONMENTAL CHECKLIST

1. **Project Title:** 92 kV CA Line Upgrade
2. **Lead Agency:** Imperial Irrigation District
3. **Contact person and phone number:** Donald Vargas, Compliance Administrator II; (760) 482-3609
4. **Address:** 333 E. Barioni Blvd., Imperial, CA
5. **E-mail:** dvargas@iid.com
6. **Project location:** The proposed project is located in the central portion of the City of Indio and along the western city boundary. The project area contains four circuit miles of transmission lines starting at the IID Northview Substation heading west on Avenue 38 to Adams St. then south to Avenue 40 then east to approximately Burr Ave. At this point, the alignment extends south through the Sun City Shadow Hills Community terminating at Avenue 42 then extending east and terminating at the IID Avenue 42 Substation. See Figure 1.
7. **Project sponsor's name and address:** Imperial Irrigation District
8. **General Plan Designation:** The proposed alignment parallels roads and extends through various general plan designations in the City of Indio. The Northview Substation is located on land designated Workplace Employment District. The Avenue 42 Substation is located on land designated Desert Estate Neighborhood.
9. **Zoning:** Alignment parallels roads and extends through various zoning districts in the City of Indio.
10. **Description of Project:** IID Transmission Planning performed a Cluster Transmission Service Study for four (4) Interconnection projects requesting transmission service to Southern California Edison's ("SCE") 230 kV Mirage Substation via Path 42 230-kilovolt (kV) transmission line. The findings of this study identified the need to upgrade IID's 92 kV CA Line between the Avenue 42 and Northview Substations to allow for the increase of transmission capacity of upwards of 1,165 megavolt-amperes. The project also includes improvements at the Avenue 42 and Northview Substations as described below.

The 92-kV CA Line upgrade project consists of upgrading approximately four (4) circuit miles of double circuit wood and steel poles from Avenue 42 Substation to North View Substation. The proposed alignment is illustrated in Figure 1. The existing configuration of this line segment is double circuit 92-kV transmission, CA, and CE lines, with various distribution circuits underbuilt (N143, N144, 1010, 1005) and optical ground wire (OPGW) in static position. The existing wood poles that make up part of the transmission line will be removed and replaced with newly redesigned and reconstructed wood poles to accommodate the new conductor. The preliminary engineering identified one (1) new steel pole required for the project and two (2) additional steel poles for future installations. The new steel poles and required foundation work is located at the northwest corner of Ave 40 and Burr St. It is assumed that all existing steel structures will remain and be reused.

The proposed project will upgrade only the CA line and OPGW. The upgrade will be single-circuit between Avenue 42 to North View Substations and 48-fiber OPGW in the static position. It is assumed the existing conductors and hardware for the CE line and distribution circuits will be reused. The upgrade will use 900 "Canary" thousands of circular mils (kcmil) aluminum concentric stranded steel (ACSS)/thermoplastic water resistant (TW) high temperature low sag (HS285) conductor. The preliminary determination is that all wood poles will be reconstructed to account for the new conductor, with the exception of one (1) new steel pole and two (2) new steel poles for future installations. Existing steel structures will be reused. To fully achieve this upgraded rating, the remote end substations, Avenue 42, and North View, will need to upgrade specific elements to allow for 2,000 ampere (A) continuous rating as specified below.

Construction activities will be outsourced to a third party. The anticipated in-service date of the project is April 2026.

The project requires the elements at Avenue 42 and Northview Substations that comprise the facility rating of the CA line to be rated to a minimum of 2,000A continuously to fully utilize the CA line rating. The initial evaluation concluded that the upgrade at Avenue 42 will be to replace single 795 MCM (i.e., thousands [M] of circular [C] mills [M] all aluminum conduct (AAC) with double 1033 MCM AAC conductors (see Figure 2). The upgrade at Northview Substation will replace twelve (12) single-circuit 95 MCM AAC conductors with double-circuit 1033 MCM AAC conductors and to replace six (6) 1,200A disconnect switches with six (6) 2,000A disconnect switches, two (2) of which will include a grounding switch (see Figure 3). The initial evaluation also identified that existing relaying protection for the CA line will need to be upgraded at both substations. The existing relays consist of one obsolete Schweitzer Engineering Laboratories (SEL) relay and one electromechanical relay which will be replaced with the latest SEL relays according to IID protections at both substations. All work will be within the substation's existing footprint.

All aspects of the upgrade including the engineering, procurement, and construction activities will be performed by IID. This will involve substation engineering, protection engineering, Supervisory Control and Data Acquisition (SCADA), telecommunications, and substation construction and maintenance.

11. **Surrounding land uses and setting:** The proposed CA 92-kV Line Upgrade project begins at the North View Substation and extends along the right-of-way of Avenue 38, Adams St., Avenue 40 and 42 through residential areas. The alignment also extends south through the Sun City Shadow Hills Community and a vacant portion of land before terminating at the Avenue 42 Substation.
12. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):** Imperial Irrigation District (IID), Encroachment permits from the City of Indio and the County of Riverside.



Figure 1
CA Line Upgrade Alignment

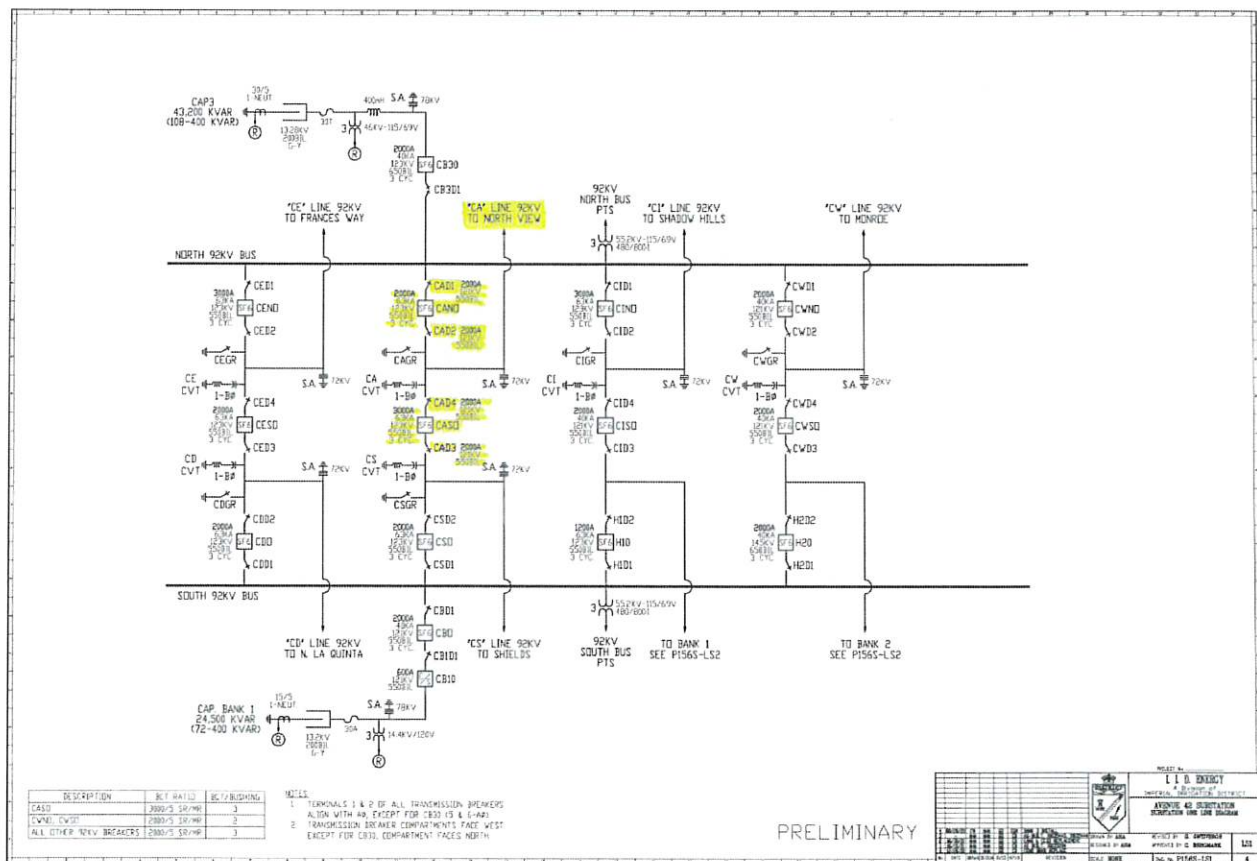


Figure 2
92-kV Avenue 41 Substation





Figure 4

CNDDDB Rarefind BIOS Mapping

Project: IID 92kV Line

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ECOLOGICAL
CONSULTING, INC.

13. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?** Yes. Letters were sent to the following tribes and or agencies on December 19, 2024.

- Agua Caliente Band of Cahuilla Indians
- Augustine Band of Cahuilla Mission Indians
- Barona Band of Mission Indians
- Cahuilla Band of Mission Indians
- California Native American Heritage Commission
- Campo Band of Kumeyaay Indians
- Chemehuevi Indian Tribe
- Cocopah Indian Tribe
- Colorado River Indian Tribes
- CRIT Tribal Historic Preservation Office
- Ewilaapaayp Band of Kumeyaay Indians
- Fort Mojave Indian Tribe
- Fort Yuma Quechen Indian Tribe
- Historic Preservation Office
- Iipay Nation of Santa Ysabel
- Inaja – Cosmit Band of Indians
- International Tribal Cultural Resources Protection Council
- Januel Indian Village A Kumeyaay Nation
- Kumeyaay Cultural Repatriation Committee
- Kwaaymi Laguna Band of Mission Indians
- La Jolla Band of Luiseño Indians
- La Posta Band of Mission Indians
- Los Coyotes Band of Cahuilla & Cupeño Indians
- Manzanita Band of Kumeyaay Nation
- Mesa Grande Band of Mission Indians
- Morongo Band of Mission Indians
- Native American Heritage Commission
- Pala Band of Mission Indians
- Pauma Band of Luiseño Indians
- Rincon Band of Luiseño Indians
- Yuhaaviatam of San Manuel Nation (formerly San Manuel Band of Mission Indians)
- San Pasqual Band of Mission Indians
- Santa Rosa Band of Cahuilla Indians
- Soboba Band of Luiseño Indians
- Sycuan Band of Kumeyaay Nation
- Torres-Martinez Desert Cahuilla Indians
- Viejas Band of Kumeyaay Indians

The comment period ended 30 days after receipt of notification. Comments were received from:

- H. Jill McCormick, M.A., Historic Preservation Office, Ft. Yuma Quechan Indian Tribe (no comment)
- Cheryl Madrigal, Rincon Band of Luiseño Indians (The project is not in the Tribe's specific Area of Historic Interest. Recommend directly contacting the Cahuilla tribes that are closer to the project and may have pertinent information.)
- Eunice Ambriz, Yuhaaviatam of San Manuel Nation (The proposed project is located outside of Serrano ancestral territory and, as such, YSMN will not be requesting to receive consulting party status.)
- Claritsa Duarte, Agua Caliente Band of Cahuilla Indians (Request for consultation, cultural resources inventory, copies of cultural resources documentation, copy of records search, Cultural Monitor present during ground disturbing activities).

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code, Section 21083.3.2). Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code, Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that the Public Resources Code, Section 21082.3 (c) contains provisions specific to confidentiality.



Photo 1: View south along north/south alignment of CA Line.



Photo 2: Segment of CA Line extending going through Sun City Shadow Hills.

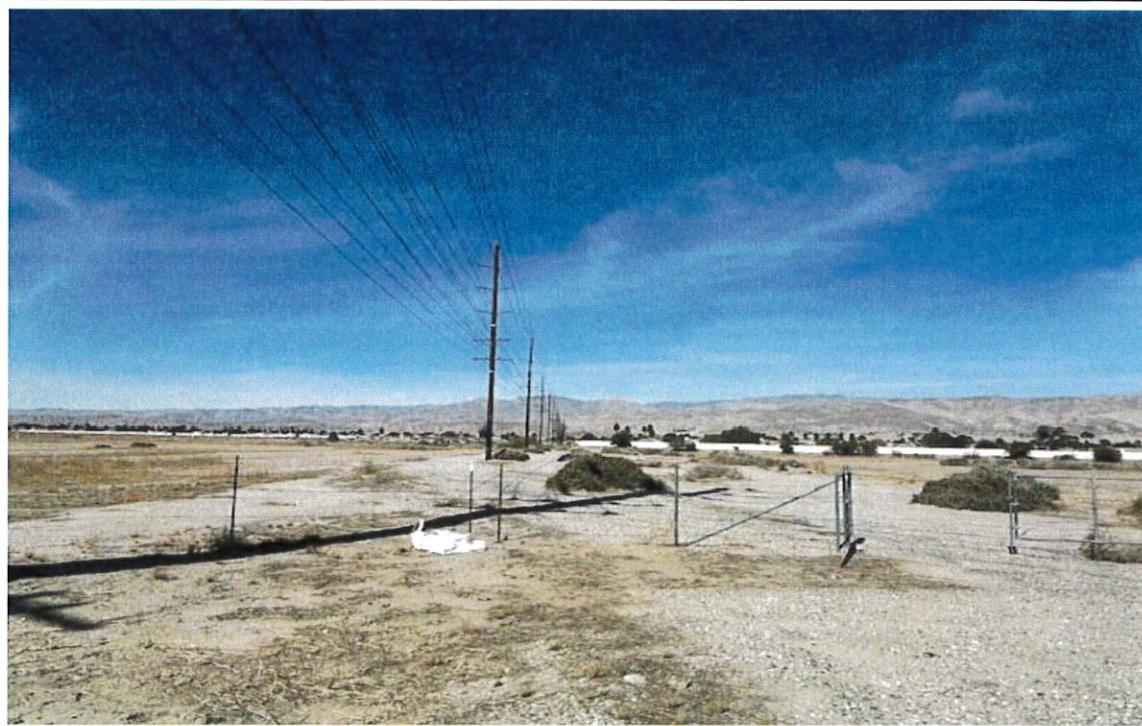


Photo 3: CA Line alignment south of Sun City Shadow Hills community.

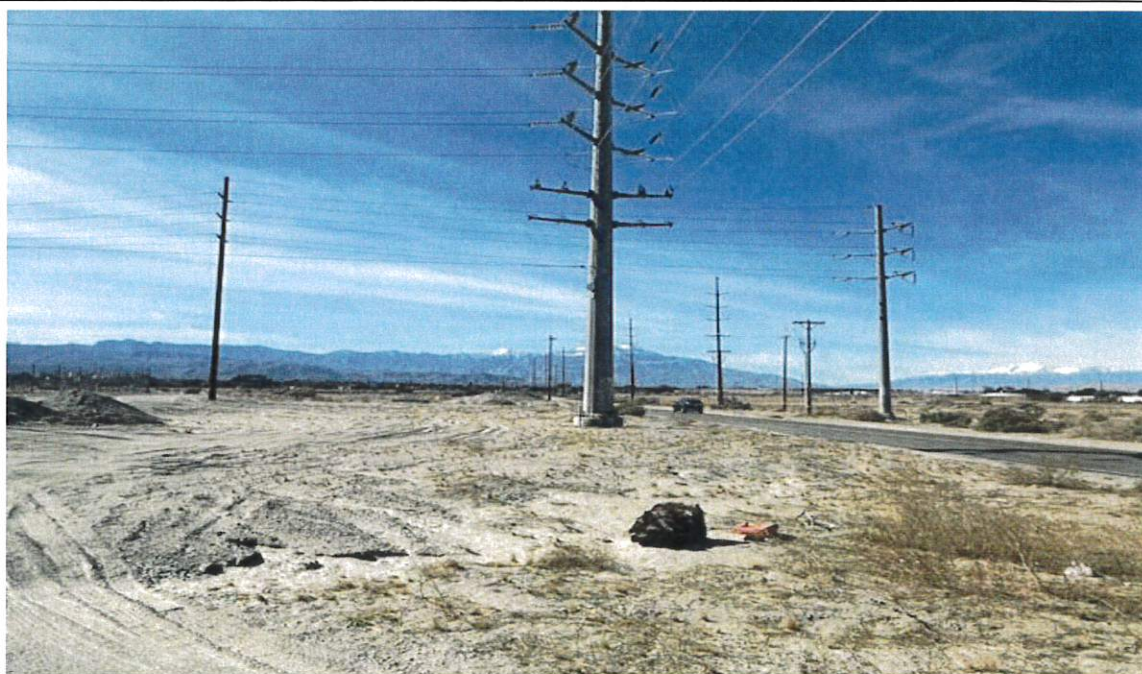


Photo 4: View of steel structure at Avenue 42.

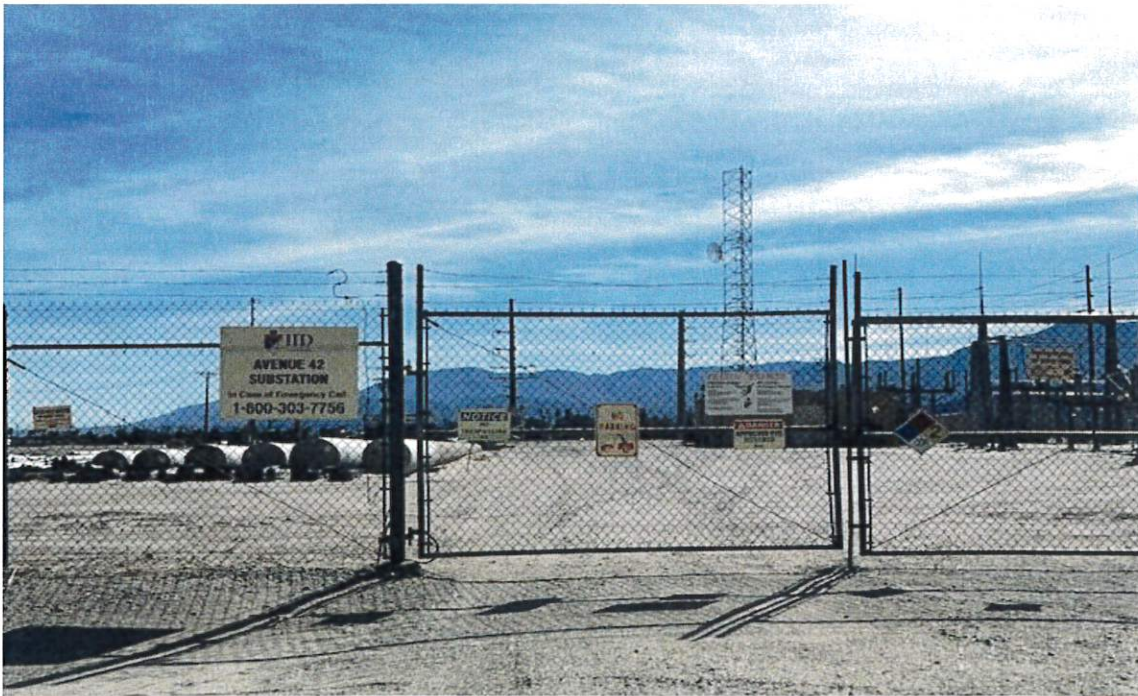


Photo 5: View of Avenue 42 Substation entrance.



Photo 6: View of CA Line south through Sun City Shadow Hills.

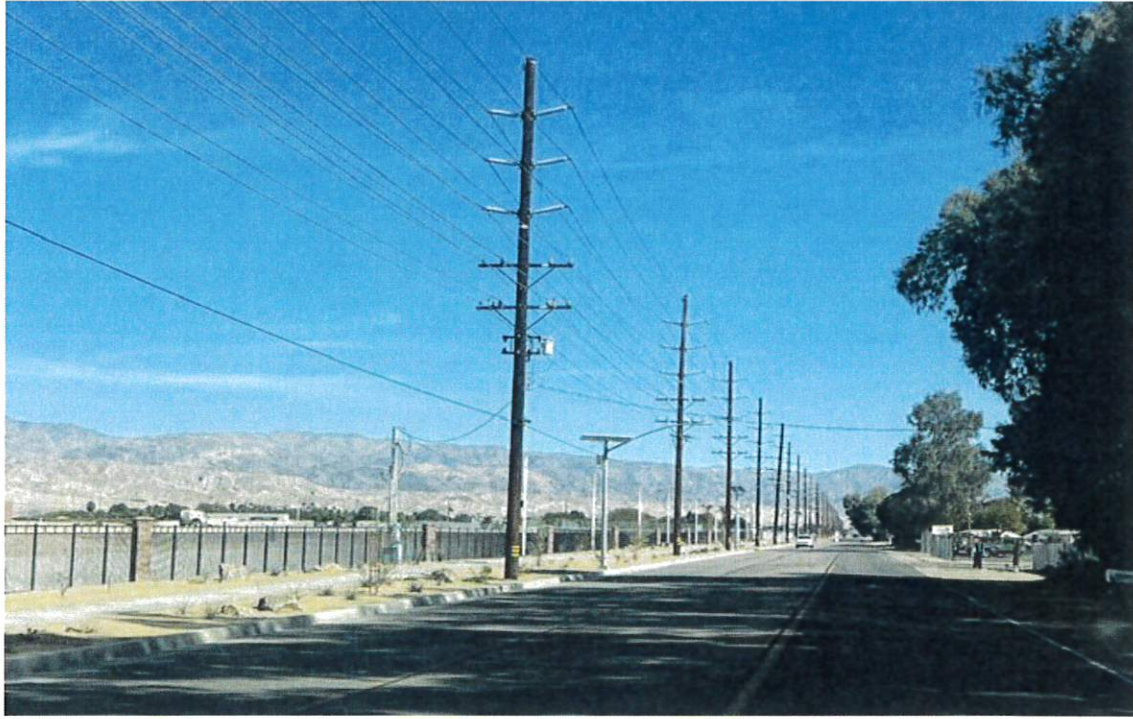


Photo 7: View east of CA Line along Avenue 40.

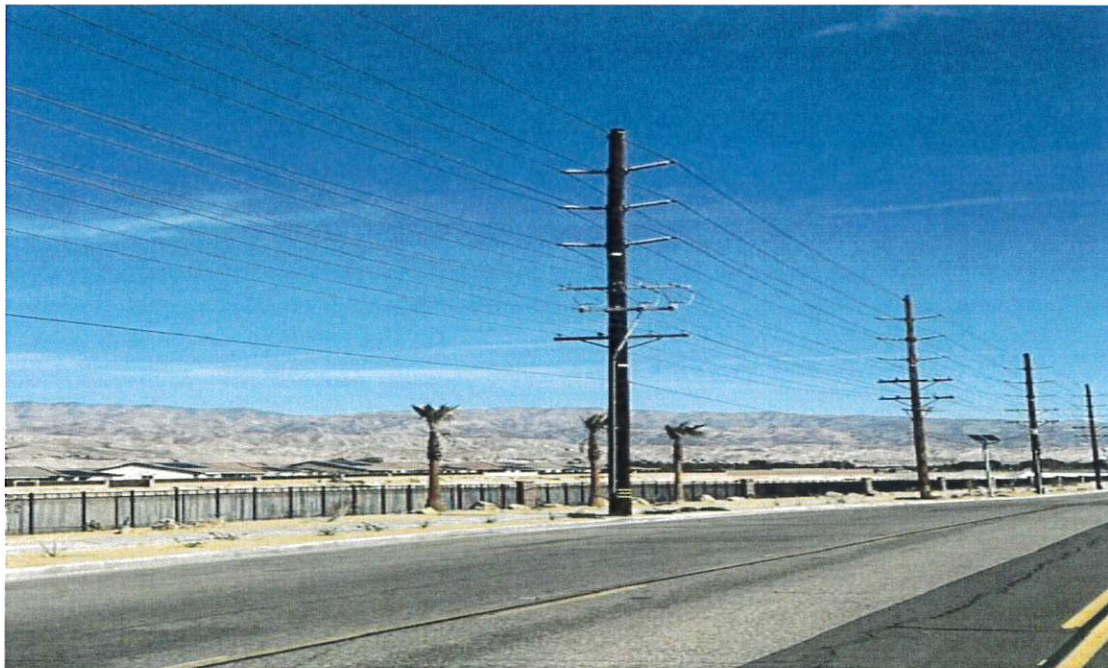


Photo 8: View east of CA Line along Avenue 40.



Photo 9: Views of CA Line steel structure at Avenue 40 and Adams Street.



Photo 10: View of CA Line at corner of Avenue 38 and Adams Street.



Photo 11: View west along Avenue 38 near terminus of CA Line at North View Substation.

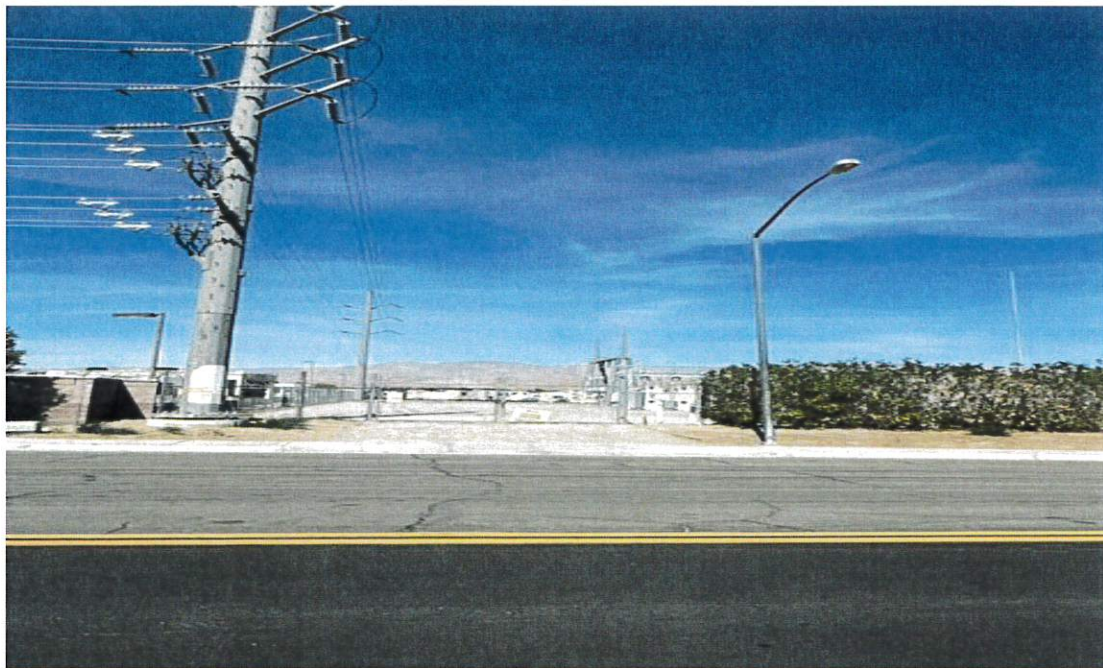


Photo 12: View north toward IID Northview Substation entrance.

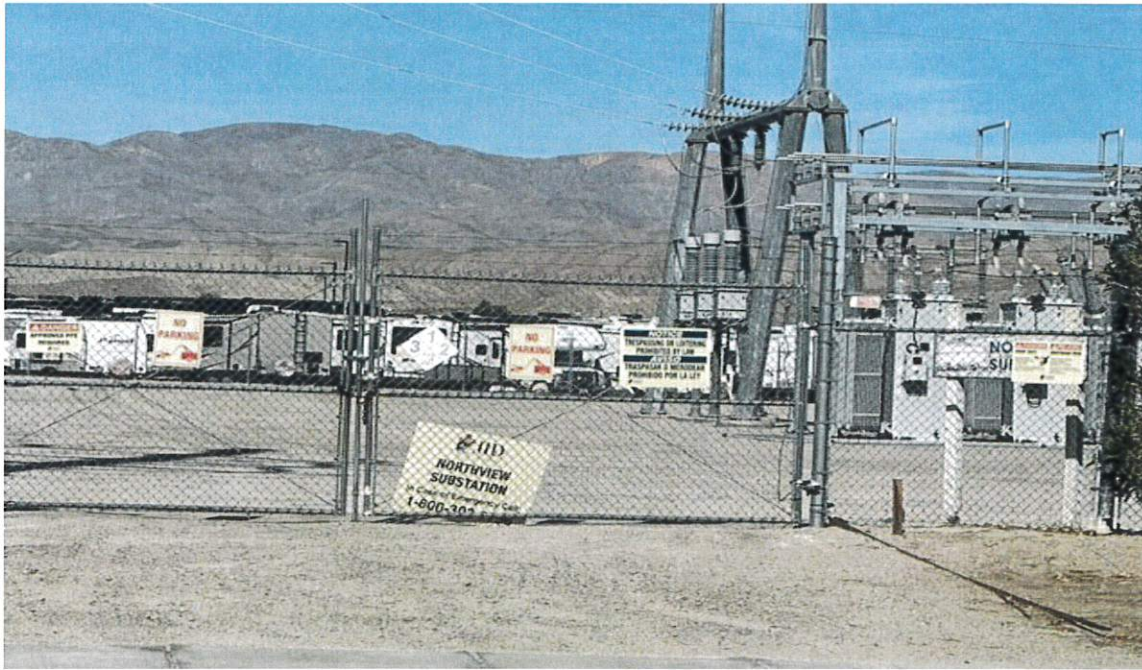


Photo 13: Entrance to IID Northview Substation.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION

After Review of the Initial Study, the IID has:

- ☐ Found that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ Found that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ Found that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ Found that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ Found that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

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

Vargas, Donald

Digitally signed by Vargas, Donald
Date: 2025.06.16 07:16:24 -07'00'

Donald Vargas, Compliance Administrator II

Date

PROJECT SUMMARY

- A. Project Location:** The project extends four circuit miles starting at the IID Northview Substation in unincorporated Riverside County immediately west of the City of Indio. The alignment extends west on Avenue 38 to Adams St. in the City of Indio then south to Avenue 40 then east to approximately Burr Ave. At this point, the alignment extends south through the Sun City Shadow Hills Community terminating at Avenue 42 then extending east and terminating at the IID Avenue 42 Substation. See Figure 1.

Project Summary: IID Transmission Planning performed a Cluster Transmission Service Study for four (4) Interconnection projects requesting transmission service to Southern California Edison Mirage Substation via the Path 42 transmission line. The findings of this study identified the need to upgrade IID's 92-kilovolt (kV) CA Line between the Avenue 42 and Northview Substations to allow for the increase of transmission capacity of upwards of 1,165 megavolt-amperes. The project also includes improvements at the Avenue 42 and Northview Substations as described below.

The 92-kV CA Line upgrade project consists of upgrading approximately four (4) circuit miles of double circuit wood and steel poles from Avenue 42 Substation to North View Substation. The proposed alignment is illustrated in Figure 1. The existing configuration of this line segment is double circuit 92-kV transmission, CA and CE lines, with various distribution circuits underbuilt (N143, N144, 1010, 1005) and optical ground wire (OPGW) in the static position. The existing wood poles that make up part of the transmission line will be removed and replaced with newly redesigned and reconstructed wood poles to accommodate the new conductor. The preliminary engineering identified one (1) new steel pole required for the Project and two (2) additional steel poles for future installations. The new steel poles and required foundation work is located at the northwest corner of Avenue 40 and Burr Street. It is assumed that all steel structures will remain and be reused.

The proposed project will upgrade only the CA line and OPGW. The upgrade will be single-circuit between Avenue 42 to North View Substations and 48-fiber OPGW in the static position. The upgrade is for only the CA line and OPGW. It is assumed the existing conductors and hardware for the CE line and distribution circuits will be reused. The upgrade will use 900 "Canary" thousands of circular mils (kcmil) aluminum concentric stranded steel (ACSS)/thermoplastic water resistant (TW) high temperature low sag (HS285) conductor. The preliminary determination is that all wood poles will be reconstructed to account for the new conductor, but existing steel structures will be reused. To fully achieve this upgraded rating, the remote end substations, Avenue 42, and North View, will need to upgrade specific elements to allow for 2,000 ampere (A) continuous rating as specified below.

Construction activities will be outsourced to a third party. The anticipated in-service date of the project is April 2026.

The project requires the elements at Avenue 42 and Northview Substations that comprise the facility rating of the CA line to be rated to a minimum of 2,000A continuously to fully utilize the CA line rating. The initial evaluation concluded that the upgrade at Avenue 42 will be to replace single 795 MCM (i.e., thousands [M] of circular [C] mills [M] all aluminum conduct (AAC) with double 1033 MCM AAC conductors (see Figure 2). The upgrade at Northview Substation will replace twelve (12) single-circuit 95 MCM AAC conductors with double-circuit 1033 MCM AAC conductors and to replace six (6) 1,200A disconnect switches with six (6) 2,000A disconnect switches, two (2) of which will include a grounding switch (see Figure 3). The initial evaluation also identified that existing relaying protection for the CA line will need to be upgraded at both substations. The existing relays consist of one obsolete Schweitzer Engineering Laboratories (SEL) relay and one electromechanical relay which will be replaced with the latest SEL relays according to IID protections at both substations. All work will be within the substation's existing footprint.

All aspects of the upgrade including the engineering, procurement, and construction activities will be performed by IID. This will involve substation engineering, protection engineering, Supervisory Control and Data Acquisition (SCADA), telecommunications, and substation construction and maintenance.

- B. Environmental Setting:** The proposed project extends through the City of Indio and includes disturbed land within the IID Northview and Avenue 42 Substations. Approximately four circuit miles of the alignment are within the right-of-way adjacent to Avenue 38, Adams St., Avenue 40, and Avenue 42. A segment also aligns through the Sun City Shadow Hills Community spanning areas of the golf course and undeveloped land south of the community.
- C. Analysis:** The project is the construction of four circuit miles of 92-kV line to replace the existing 92-kV CA line. The project also includes improvements with the footprint of the existing Northview and Avenue 42 Substations. The areas impacted have all been previously disturbed by construction of the original 92-kV line and substations as well as the Sun City Shadow Hills Community. The analysis contained in this document examines any short-term construction impacts that may occur as a result of the project as well as any long-term operational impacts associated with the upgrade.
- D. General Plan Consistency:** The proposed 92-kV CA Line alignment parallels roads and extends through various general plan designations in the City of Indio. The Northview Substation is located on land designated Workplace Employment District. The Avenue 42 Substation is located on land designated Desert Estate Neighborhood. The project would not be considered inconsistent as it is an upgrade of an existing project.
- E. Evaluation Of Environmental Impacts:**
- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
 - 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
 - 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
 - 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

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- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
 - 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
 - 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
 - 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
 - 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

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

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

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

No Impact. The proposed pole replacement project extends four circuit miles between Northview Substation and Avenue 42 Substation. The path is located adjacent to existing roads and extends through the Sun City Shadow Hills Community. The surrounding area is characterized by flat topography and urban development in the City of Indio. The project replaces approximately 50 wooden poles along the existing 92-kV CA Line and infrastructure within the footprints of both substations and would not add to or change existing views. There are no Caltrans designated or eligible scenic highways in the City of Indio (Caltrans 2025). None of the proposed poles or substation infrastructure improvements are within a scenic vista or adjacent to a scenic highway. Therefore, the proposed project would have no impact on a scenic vista or scenic highway.

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

No Impact. The proposed pole replacement project extends four circuit miles between Northview Substation and Avenue 42 Substation. The path is located adjacent to existing roads including Avenue 38, Adams St., Avenue 40, and Avenue 42 and extends through the Sun City Shadow Hills Community. The existing poles will be replaced, and improvements will be made within the footprints of both substations. As described in item "a)" above, the proposed project would have no impact on a scenic vista, scenic highway nor any other scenic resources. Therefore, no impact would occur regarding damaging scenic resources 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? ☐ ☐ ☐ ☒

No Impact. The proposed project is within the City of Indio. The 92-kV CA Line Upgrade replacement is visible for travelers along Avenue 38, Adams St., Avenue 40, and Avenue 42. The proposed project includes replacement of 50 existing wooden poles as well as improvements within the footprint of both substations. Following short-term construction activities, the replacement of the poles would not change the existing views along the adjacent roadways or within the substations. The addition of additional infrastructure within the substations would not dramatically change views as these are already fenced areas with electrical infrastructure. The character 92-kV CA Line and substations are industrial utility facilities and would not be adversely impacted by the additional components or other regulations governing scenic quality. Therefore, no impact is identified for this issue area.

- d) Create a new source of substantial light or glare which would adversely affect day or ☐ ☐ ☐ ☒

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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nighttime views in the area?

No Impact. The Northview and Avenue 42 Substation properties currently include overhead and security lights for nighttime illumination and safety. No additional lighting is proposed. No additional lighting is proposed along the 92-kV CA Line. Nighttime construction requiring illumination is not proposed. Therefore, no impact is anticipated regarding creating a new source of substantial light or glare which would adversely affect day, or nighttime views.

II. AGRICULTURE AND FORESTRY RESOURCES

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

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

No Impact. The proposed project aligns through lands designated as Other Land and Urban and Built-Up land on the California Department of Conservation Important Farmland Finder Map (DOC 2025). Replacement of 50 wooden poles and improvements to infrastructure with the Northview and Avenue 42 Substations would have no impact on farmland. Thus, the project would no impact on converting Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use.

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

No Impact. The proposed 92-kV CA Line Upgrade project would replace 50 existing wooden poles and improve infrastructure within the footprint of the Northview and Avenue 42 Substations. None of the areas affected are located on agricultural lands. Therefore, the proposed project would not conflict with the existing Agricultural zoning or surrounding Williamson Act Contracts in non-renewal. The project would have no impact on agricultural zoning 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 ☐ ☐ ☐ ☒

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Section 51104(g))?

No Impact. Based on the City of Indio Land Use Map, there are no timberland areas within the boundaries of the city. The Northview Substation is within unincorporated Riverside County but is not on forest or timberland. No impact would occur.

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

No Impact. There are no existing forest lands either on-site or within the City of Indio or in Riverside County in the area of the Northview Substation. The proposed project would not result in the loss of forest land or conversion of forest land into non-forest use. Therefore, no impact is identified for this issue area.

- 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? ☐ ☐ ☐ ☒

No Impact. As discussed in items "c" and "d" above, the proposed project would not result in the conversion of farmland to a non-agricultural use. The project includes the replacement of 50 existing wooden poles and infrastructure improvements within the footprint of the Northview Substation and Avenue 42 Substation. The project would not result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. No impact would occur.

III. AIR QUALITY

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

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

Less than Significant Impact. The project site is within the South Coast Air Quality Management District (SCAQMD). The proposed project extends four circuit miles between the Northview Substation and the Avenue 42 Substation and includes the replacement of existing poles and improvements to be made to two existing substations. Equipment used during construction would include boom trucks, bucket trucks, wire pulling trailers, rope pulling trailers, water truck, pickup truck, material handling trailers. The equipment would operate intermittently and continuously over a four-month construction period. Short-term air quality emissions would be generated during construction activities in association with replacing the existing poles and operation of heavy equipment to install upgraded facilities. Once operational, the project would not generate additional emissions in comparison to the existing facilities. The project will comply with all applicable SCAQMD Rules and Regulations as well as with all applicable State and federal requirements for attainment of air quality objectives. Therefore, the project's impact regarding conflicting with or obstructing implementation of an applicable air quality plan is considered less than significant.

- b) Result in a cumulatively considerable net increase of any criteria pollutant for which the ☐ ☐ ☒ ☐

project region is non-attainment under an applicable federal or state ambient air quality standard?

Less than Significant Impact. As noted in item “a),” above, the project site is within the SCAQMD. The South Coast Air Basin is classified as an “extreme” nonattainment area and the Coachella Valley is classified as a “severe-15” nonattainment area for the 2015 Ozone National Ambient Air Quality Standard. This means that the background levels of ozone are at times higher than the ambient air quality standards. The air quality standards were set to protect the health of sensitive individuals (i.e., elderly, children, and the sick). Therefore, when the concentration of those pollutants exceeds the standard, it is likely that sensitive individuals of the population may experience adverse health effects.

Once construction is complete, minor emissions would be generated in association with maintenance of the poles and operation of the upgraded switch station from vehicle trips. Although the project is the replacement of existing poles and the upgrade of existing substations, it is possible that an increase in one trip per year would occur in association with operations and maintenance. Table AQ-1 summarizes construction and operational limits for criteria pollutants.

Table AQ-1
SCAQMD Air Quality Significance Thresholds

Pollutant	Construction	Operation
NO _x	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM ₁₀	150 lbs/day	150 lbs/day
PM _{2.5}	55 lbs/day	55 lbs/day
SO _x	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day

Source: SCAQMD CEQA Handbook, 1993.

Equipment used during construction would include boom trucks, bucket trucks, wire pulling trailers, rope pulling trailers, water truck, pickup truck, material handling trailers. The equipment would operate intermittently and continuously over a four-month construction period. Due to the minimal construction activities required to complete the proposed replacement and upgrades, no localized significance threshold would be exceeded during project operations. Therefore, the proposed project would not 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.

- c) Expose sensitive receptors to substantial pollutant concentrations? ☐ ☐ ☒ ☐

Less than Significant Impact. Single-family residences are adjacent (differing proximity) to the poles to be replaced along the 4 four (4) circuit miles of the proposed project and across the street (approximately 50 feet) from the Northview Substation. Single family residences are approximately 0.23 miles north of the Avenue 42 Substation. Although the sensitive receptors are within close proximity to a portion of the linear project area, the amount of construction emissions generated would be very limited and for a short duration as the equipment would operate intermittently and continuously over a four-month construction period. Based on the distance to the sensitive receptors, the limited duration of construction, and the fact that Best Management Practices (SCAQMD

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Regulation XVI – Mobile Source Offset Programs) such as watering to control dust, stopping activities when wind speeds exceed 20 mph, etc., sensitive receptors would not be exposed to prolonged or substantial pollutant concentrations. Therefore, the proposed project would result in less than significant impacts regarding exposing sensitive receptors to substantial pollutant concentrations.

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

Less than Significant Impact. Potential odor impacts depend on multiple factors including the type of odor generated; the intensity of the source; the sensitivity of the receptor; the intensity of the source; and the direction and speed of the wind. Odors present a nuisance to the public and result in citizen complaints. During demolition and construction, exhaust from equipment (trucks, earthmoving equipment) may produce odors typically resulting from dust and heavy equipment exhaust. Odors produced during construction consist of unburned hydrocarbons from tailpipes of construction equipment. Equipment emission odors typically disperse rapidly and do not affect substantial numbers of people due to the localized area affected. Sensitive receptors are also set back approximately 50 feet from where the emissions would be generated and construction would be occurring for a short period of time while each pole is replaced along the four (4) miles of project area. Therefore, odors adversely affecting a substantial number of people is considered less than significant.

IV. **BIOLOGICAL RESOURCES**

Would the project:

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

- a) **Less Than Significant Impact.** The following discussion is based on the *Biological Resource Assessment for the Imperial Irrigation District, 92KV Transmission Line Upgrade North View Substation to Avenue 42 Substation, Indio, California* prepared for the project by Argonaut Ecological Consulting, Inc. (Appendix A). Argonaut conducted a biological resource assessment of 3.9-mile corridor (i.e., "Study Area") for the proposed 92kV transmission line upgrade as depicted in Figure 1, CA Line Upgrade Alignment. The evaluation relied on available literature, aerial photography, historic topographic and aerial maps, and a site visit.

The Study Area lies within the Sonoran Desert. Classification and Assessment with Landsat of Visible Ecological Groupings (CALVEG) maps the Study Area as "barren" which indicates there is limited vegetative community present. The Study Area has been disturbed from years of use by IID, agricultural operations, and residential development. No mammals or evidence of mammals was

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

A query of the California Natural Diversity Database (CNDDDB) and the United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) was performed to determine which special status species could be present within the Study Area. No critical habitat or wetland features exist for any species within or near the Study Area. The CNDDDB Bios mapping is shown in Figure 4, CNDDDB Rarefind BIOs Mapping. This map shows the location of known records of special status species near the Study Area, and Table BIO-1 includes a summary of the CNDDDB query result, listing status and the potential impacts and potential for occurrence within the Study Area.

The Study Area is located roughly 1 miles east of the Coachella Valley National Wildlife Refuge. The Study Area and the Refuge are separated a large golf course/housing development (Desert Palms) and Washington Street. The Refuge is known to support numerous species covered in the Coachella Valley Multi-Species Habitat Conservation Plan (CVMSHCP). However, the Study Area is located outside any designated conservation areas but is located within an urbanized area within the CVMSHCP boundary. As previously discussed, the majority of the corridor is located within landscape areas along existing roadways. There is one segment that is located between the Shadow Hills community and Avenue 42 that is along an existing access road (IID). This access road area supports little vegetation is primarily composed of gravel and compacted soils

The amount of existing disturbance within the corridor and the lack of vegetative cover (other than landscape species) or suitable nesting substrate severely limits the habitat value of the Study Area. Only two listed species are near the Study Area: the Coachella Valley fringe-toed lizard (federally threatened/State endangered) and Coachella Valley milk vetch (federally endangered). Numerous species included in the CVMSHCP are known to occur surrounding the Study Area, but there are no known records of these species within or near the Study Area, and suitable habitat for these species is absent, as shown in Table BIO-1. In addition, the Study Area does not have any published or unpublished CNDDDB records for any species of concern, nor any predicated habitat for any of the identified species of concern

Table BIO-1
Summary of Special Status Species, Potential Occurrence, and Impact

Common Name	Scientific Name	Status	Effects¹	Potential Occurrence in the Study Area
Mammals				
Western mastiff bat	<i>Eumops perotis californicus</i>	--/-- SSC	ME	Absent. Suitable habitat consists of extensive open areas with abundant roost locations provided by crevices in rock outcrops and buildings. No suitable habitat present.
Western yellow bat	<i>Laslurus xanthinus</i>	--/-- SSC	ME	Absent. Found in valley foothill riparian, desert riparian, desert wash, and palm oasis habitats. Often roosts in palms. No evidence of occupation.
Palm Springs pocket mouse	<i>Perognathus longimembris</i>	--/-- SSC	NE	Absent. Grassland and alkali desert scrub habitat. Suitable habitat is not

	<i>bangsi</i>			present.
American badger	<i>Taxidea taxus</i>	--/-- SSC	NE	Absent. No burrowing mammals within the Study Area.
Pam Springs round-tailed ground squirrel	<i>Oerospermophilus tereticaudus chlorus</i>	--/--	NE	Absent. No ground squirrels were observed within the Study Area, and no suitable habitat was present.
Birds				
Burrowing owl	<i>Atheneo cunicularia</i>	--/-- SSC	NE	Absent. Associated with ground burrowing mammals (i.e., ground squirrels). No ground squirrels or underground burrows (or suitable nesting areas) are found within the Study Area.
Ferruginous hawk	<i>Buteo regalis</i>	--/--	NE	Absent. Found in open semiarid grasslands and
Le Conte's thrasher	<i>Toxostoma lecontei</i>	--/--	NE	Absent. Typically, nests in dense and thorny shrubs such as the saltbush. No suitable nesting substrate is present.
Crissal thrasher	<i>Taxostoma crissale</i>	--/--	NE	Absent. Found in mesquite thickets, brush arroyos, shrubs within canyons, or pinyon-oak-juniper woodlands. No suitable habitat present.
Vermillion flycatcher	<i>Pyrocephalus rubinus</i>	--/--	NE	Absent. Prefers streamside habitat or desert habitat near water with scattered trees. No suitable habitat present.
Black-tailed gnatcatcher	<i>Polioptila melanura</i>	--/--	NE	Absent. Nests in low shrubs. No suitable nesting habitat is present within or near the Study Area.
Amphibians, Reptiles, and Invertebrates				
Coachella Valley fringe-toed lizard	<i>Uma Inornata</i>	FT/CE	NE	Absent. The lizard is restricted to habitats with fine, windblown sand deposits in the sandy plains—present within the Coachella Valley. Marginal habitat in small areas potentially present.
Desert tortoise ³	<i>Gopherus agassizii</i>	FT/CT	NE	Absent. Suitable soil substrate is unavailable within the Study Area, and fences and roadways preclude movement into the site.
Flat-tailed horned lizard	<i>Phrynosoma mcallii</i>	--/-- SSC	NE	Absent. Typical habitat is sandy desert hardpan or gravel flats with scattered, sparse vegetation. Suitable habitat is not present within the Study Area.
Coachella giant sand treader cricket	<i>Macrobaenetes vaigum</i>	--/--	NE	Likely absent. According to the Coachella giant sand treader cricket model, with one occurrence south of

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(NI)

				the Study Area and west of Indio. Occurs on wind swept sand ridges and suitable habitat does not appear to be present in the Study Area.
Algondones supargia	<i>Euparagla unidentata</i>	--/--	NE	Likely Absent. Record from 1973 and little information about potential occurrence within the Study Area.

Source: Argonaut 2025, p. 17.

¹ Status= Listing of special status species, unless otherwise indicated

CE: California listed as Endangered
 CT: California listed as Threatened
 CC: California candidate species
 SSC: California Species of Special Concern
 FE: Federally listed as Endangered
 FT: Federally listed as Threatened

² Effects = Effect determination

NE: No Effect
 ME: May Effect, not likely to adversely affect

³ Species are not included within the CNDDDB Query but are included in the IPaC data query.

Definition of Occurrence Indicators:

Absent/Likely Absent: Species not recorded in Study Area suitable or critical habitat components are absent.

Given the lack of suitable habitat and lack of animals present during the surveys, impacts to special status animals is considered less than significant.

Special Status Plant Species

The physical components and land use strongly influence the types of plants present. Table BIO-2 provides a summary of special status plants but is not an exhaustive inventory of plants present. As shown, of the seven species identified, none were present in the Study Area.

Table BIO-2
Summary of Special Status Plants, Potential Occurrence, and Impact

Common Name	Scientific Name	Status¹	Effects²	Potential Occurrence in the Study Area
Chaparral sand-verbena	<i>Abronia villosa</i> <i>var. aurita</i>	--/-- 1B.1	NE	Absent. No vegetative habitat exists within the Study Area (except for landscape species immediately surrounding the J26 Date Growers Building" Barren habitat.
Coachella Valley milk-vetch	<i>Astragalus lentiginosus</i> <i>var. coachellae</i>	FE/-- 1B.2		
Gravel milk-vetch	<i>Astragalus sabulorum</i>	--/--		
Glandular ditaxis	<i>Ditaxis claryana</i>	--/-- 2B.2		
Lancaster milk-vetch	<i>Astragalus preussii</i> <i>var. laxiflorus</i>	--/-- 1B.1		
Broadleaf pondweed	<i>Stuckenia striata</i>	--/-- 2B.3		
Algondones supargia	<i>Euparagla unidentata</i>	--/--		

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Source: Argonaut 2025, p. 17.

¹Status= Listing of special status species, unless otherwise indicated

FE: Federally listed as Endangered

1B.X California Native Plant Society, Rare Plant Ranking

Plants with a California Rare Plant Rank of 1B are rare throughout their range, with most endemic to California. Most of the plants that are ranked 1B have declined significantly over the last century.

California Rare Plant Rank of 2B is rare in California but standard in other states.

²Effects = Effect determination

NE: No Effect

Definition of Occurrence Indicators:

Absent/Likely Absent: Species not recorded in Study Area and suitable or critical habitat components are absent.

Source: CNDDDB = California Natural Diversity Database provided by CDFG and U.S. Fish and Wildlife Service, Information for Planning and Consultation (IPaC). Accessed online on January 20, 2024.

Given the lack of suitable vegetative habitat and absence of sensitive plants during surveys, impacts to special status plants is considered less than significant.

- 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?
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| ☐ | ☐ | ☐ | ☒ |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

No Impact. As discussed under item "a)" above, the existing Study Area has been disturbed from years of use by IID, agricultural operations, and residential development. Additionally, no wetland features were found during the project survey and no wetland or other aquatic features are mapped by the National Wetland Inventory (Argonaut, 2025, p. 12). Therefore, the proposed project would have no impact on any riparian habitat or other sensitive natural community.

- 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?
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| ☐ | ☐ | ☐ | ☒ |
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No Impact. For purposes of the biological resource assessment, wetland habitat includes those areas considered "Waters of the U.S." by the U.S. Army Corps of Engineers (Army Corps) or Waters of the State of California. No wetland features exist within the Study Area (Argonaut 2025, p. 12). As discussed under item "b)" above, no wetland or other aquatic features are mapped by the National Wetland Inventory. Therefore, the project would have no impact on federally protected wetlands.

- d) Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| ☐ | ☐ | ☐ | ☒ |
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No Impact. Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the migration of animals. The Study Area does not provide any wildlife

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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movement or corridor functions due to existing disturbances related to human presence, surrounding roadways, traffic and noise disturbances that preclude or dissuade wildlife from utilizing the Study Area. Many of the species that are commonly found in urban environments, such as those within the Study Area, do not have specific movement corridor requirements but instead use non-specific movement patterns across these urban areas. Based on the lack of migratory corridors in the Study Area, no impact would occur.

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

No Impact. See discussion under item "a)" above.

- 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? ☐ ☐ ☐ ☒

No Impact. The project is in the boundaries of the Coachella Valley Multi-Species Habitat Conservation Plan (CVMSHCP). The CVMSHCP identifies specific activities/lands operated/managed by the IID that are covered by the HCP (i.e., subject to the HCP). The activities included in the proposed project are not included within the IID "covered activities" identified by the CVMSHCP. Therefore, no impact would occur.

V. CULTURAL RESOURCES

Would the project:

- a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5? ☐ ☐ ☐ ☒

No Impact. The following discussion is based on the *Cultural Resource Assessment for the Proposed Imperial Irrigation District Project* prepared by Peak & Associates, Inc. (Appendix B). The assessment includes a records search through the South Coast Information Center (February 13, 2025) and a field survey of the Study Area. Records search data was requested by Peak & Associates, however, Riverside County records previously contained at the Eastern Information Center were formally transferred to the South Coast Information Center in 2024 and no response was provided after multiple attempts.

For the purposes of CEQA, an historical resource is a resource listed in, or determined eligible for listing in the California Register of Historical Resources. When a project will impact a site, it needs to be determined whether the site is an historical resource. However, the proposed 92-kV CA Line Upgrade project would replace 50 existing power poles and upgrade infrastructure within the footprint of the Northview and Avenue 42 Substations. Therefore, there would be no substantial adverse change in the significance of a historical resource. No impact would occur.

- b) Cause a substantial adverse change in the significance of an archaeological resource ☐ ☒ ☐ ☐

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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pursuant to §15064.5?

Potentially Significant Impact Unless Mitigation Incorporated. A field survey of the parcel was conducted of the Study Area by Michael Lawson of Peak & Associates. The project site has been previously disturbed, leveled and compacted as the proposed project would replace 50 existing power poles and upgrade infrastructure within the footprint of the Northview and Avenue 42 Substations. Any archaeology that was present within the project footprint would have been disturbed and would no longer remain intact. Replacement of the existing poles and upgrades to the substation infrastructure would not penetrate the surface of the site to any significant depth. However, excavations for concrete foundations of the poles may go from 2 feet to 30 feet deep. Based on these depths, the potential to disturb previously unknown archaeological resources is potentially significant unless mitigation is incorporated.

Mitigation Measures

MM CUL-1 Worker Environmental Awareness Program. Prior to the initiation of any on-site grading, all construction/contractor personnel working on site must complete training through a Worker Environmental Awareness Program (WEAP) to educate personnel of potential cultural resources that could be exposed during construction. New construction workers engaged in construction activities (e.g., grading, utility installation, etc.) shall complete WEAP training within the first week of deployment on the site. Additionally, operational staff shall complete WEAP training prior to deployment on the site.

Timing/Implementation: Prior to the initiation of any on-site grading.

Enforcement/Monitoring: Project contractor.

MM CUL-2 Archaeological Discovery. In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards can evaluate the significance of the find and determine whether or not additional study is warranted. If the discovery is clearly not significant (e.g., an isolate) the archaeologist may simply record the finding and allow work to continue. If the discovery proves potentially significant under CEQA, additional work such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.

Timing/Implementation: During construction involving drilling or excavations to depths of 3 feet or more.

Enforcement/Monitoring: Archaeological Monitor and Imperial Irrigation District.

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

Potentially Significant Impact Unless Mitigation Incorporated. As described in item b) above, due to the existing poles and substations, it is not likely that human remains would be found on the project site based on years of disturbance. However, depending on the depth of excavation, there is potential for previously unknown human remains to be present. This impact would be reduced to

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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less than significant with the implementation of mitigation measure CUL-3 below.

Mitigation Measures

MM CUL-3 Human Remains Discovery. If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:

- If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately, and no agency notifications are required.
- If the professional archaeologist determines that the find does represent a cultural resource from any period or cultural affiliation, the archaeologist shall immediately notify the lead agencies. The agencies shall consult on a finding of eligibility and implement appropriate treatment measures, if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines or a historic property under Section 106 NHPA, if applicable. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the site either: 1) is not a Historical Resource under CEQA or a Historic Property under Section 106; or 2) that the treatment measures have been completed to their satisfaction.
- If the find includes human remains, or remains that are potentially human, they shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641). The archaeologist shall notify the Imperial County Medical Examiner (per Section 7050.5 of the Health and Safety Code). The provisions of Section 7050.5 of the California Health and Safety Code, Section 5097.98 of the California PRC, and AB 2641 will be implemented. If the coroner determines the remains are Native American and not the result of a crime scene, the coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the project (Section 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the
- NAHC can mediate (Section 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (Section 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

Timing/Implementation: As needed during grading and construction.
Enforcement/Monitoring: Imperial Irrigation District.

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

Less than Significant Impact. The proposed project upgrading approximately four circuit miles of double circuit wood and steel poles from Avenue 42 Substation to North View Substation and conductor upgrades at the substations. Energy would be needed during construction of the project. Energy needs would be limited to diesel fuel and gasoline for trucks and equipment. These materials would not be used in large quantities or in an inefficient or wasteful manner during construction. Once construction is complete, the project would utilize and convey electricity as part of its operation. The end goal of the project is to make the IID electrical system more dependable and less vulnerable to overload and potential blackouts. Thus, energy use associated with construction and operation of the project is not considered wasteful, inefficient, or unnecessary use of energy resources. This impact is considered less than significant.

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

No Impact. The City of Indio General Plan Land Use Map does not include Renewable Energy Overlay Zone as a land use designation. The proposed project is in an urbanized area and includes upgrading approximately four circuit miles of double circuit wood and steel poles from Avenue 42 Substation to North View Substation and conductor upgrades at the substations. The end goal of the project is to make the IID electrical system more dependable and less vulnerable to overload and potential blackouts. Construction of the proposed project would not conflict with any state or local plan regarding energy efficiency. No impact would occur.

VII. GEOLOGY AND SOILS

Would the project:

- a) 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. ☐ ☐ ☒ ☐

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Less than Significant Impact. According to the City of Indio General Plan Update Final EIR (Rincon, 2019, p. 4.6-5), there are no designated Alquist-Priolo Earthquake fault zones that traverse the proposed project area. The San Andreas Fault is the closest fault and is approximately two miles to the northeast. Given the distance, the potential for rupture is not likely and is considered a less than significant impact.

- ii.) Strong Seismic ground shaking? ☐ ☐ ☒ ☐

Less than Significant Impact. The primary seismic hazard at the project site is the potential for strong ground shaking during earthquakes along the San Andreas Fault. The project site is approximately two miles from the San Andreas fault and is located in areas identified with moderate and high ground shaking risks. The proposed project does not include habitable structures that could be damaged in a seismic event and consists of replacing existing poles and upgrading existing substation equipment. Additionally, all IID equipment and transmission infrastructure must be designed in accordance with the most current edition of the Uniform Building Code (UBC) and the California Building Code (CBC) as applicable to withstand seismic hazards. Compliance with these codes is considered sufficient to address seismic hazards. Thus, impacts resulting from strong seismic shaking are considered less than significant.

- iii.) Seismic-related ground failure, including liquefaction? ☐ ☐ ☒ ☐

Less than Significant Impact. Liquefaction occurs when granular soil below the water table is subjected to vibratory motions, such as those produced by earthquakes. According to the City of Indio General Plan Update Final EIR (Rincon, 2019, p. 4.6-5), the project site is in an area identified as having low to moderate liquefaction susceptibility. Figure 4.5-5, Liquefaction Hazard Map, depicts the level of liquefaction susceptibility in the City of Indio and shows that the potential for liquefaction is not likely and is considered a less than significant impact.

- iv.) Landslides? ☐ ☐ ☐ ☒

No Impact. According to the City of Indio General Plan Update Final EIR (Rincon, 2019, p. 4.6-6), the City is relatively flat and, including the project area, is located in land identified with less than 15 percent slopes, and accordingly, not identified with low, moderate, high, or existing landslide susceptibility. Therefore, no impact would occur regarding landslides.

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

Less than Significant Impact. The proposed pole replacement project extends four circuit miles between Northview Substation and Avenue 42 Substation. The existing poles will be replaced, and improvements will be made within the footprints of both substations. Some soil exposure and disturbance would occur during pole replacement and construction of the proposed project. The amount of soil disturbed would be small as mass grading is not required. Because more than one acre of soil will be disturbed as part of project construction, a Stormwater Pollution Prevention Plan (SWPPP) will be required. The SWPPP will identify Best Management Practices (BMPs) to ensure that exposed soils are responsibly managed to avoid erosion during a rain event. Therefore, impacts

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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regarding substantial soil erosion or the loss of topsoil are considered less than significant.

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

Less than Significant Impact. The proposed project work will be conducted within previously developed areas as the proposed project includes the replacement of existing poles and improvements to be made within the footprints of the Northview Substation and Avenue 42 Substation and would not result in a geologic unit or soil becoming unstable. Additionally, the project must comply with the UBC and CBC to ensure the structures are designed in accordance with geologic and seismic conditions. Concrete and steel structures must follow standard IEEE-693: recommended Practice for Seismic Design of Substations. Compliance with mandatory design and building requirements will reduce potential impacts associated with construction on an unstable geologic unit to less than significant.

- d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?
- | | | | |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| ☐ | ☐ | ☒ | ☐ |
|--------------------------|--------------------------|-------------------------------------|--------------------------|

Less than Significant Impact. According to the City of Indio General Plan Update Final EIR (Rincon, 2019, p. 4.6-6), soil types with potential to result in shrinking and swelling are not located in the city, however, soils with clay are present in the eastern portion of the city. The project site is located in the western part of the city and poles to be replaced and the substations to receive upgrades have been previously developed and as such the soil has been engineered to support the existing and proposed structures. The project does not include any habitable structures and the foundations for the proposed equipment will be designed and engineered, taking into consideration the soils present. Therefore, direct, and indirect risk to life and property are considered less than significant.

- e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| ☐ | ☐ | ☐ | ☒ |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

No Impact. The proposed project does not propose new septic tanks or an alternative wastewater disposal system. The facility would continue to operate using the existing septic system. No impact would occur.

- f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
- | | | | |
|--------------------------|-------------------------------------|--------------------------|--------------------------|
| ☐ | ☒ | ☐ | ☐ |
|--------------------------|-------------------------------------|--------------------------|--------------------------|

Potentially Significant Impact Unless Mitigation Incorporated. The proposed 92-kV CA Line Upgrade project would replace 50 existing wooden poles and improve infrastructure within the footprint of the Northview and Avenue 42 Substations. All areas impacted by pole replacement and facility upgrades would have been previously disturbed in association with the existing IID facilities. These areas are flat with no distinguishing geologic features. Thus, no unique aboveground geologic

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features are present. However, excavations for concrete foundations could go from 2 feet to 30 feet deep. Based on these depths, the potential to disturb previously unknown paleontological resources is potentially significant unless mitigation is incorporated. As previously unknown paleontological resources present, the potential exists for damage during construction activities. Therefore, impacts to paleontological resources are considered potentially significant unless mitigation is incorporated.

Mitigation Measures

MM GEO-1: Paleontological Resource Discovery. In the event that unanticipated paleontological resources or unique geologic resources are encountered during ground disturbing activities, work must cease within 50 feet of the discovery and a paleontologist shall be hired to assess the scientific significance of the find. The consulting paleontologist shall have knowledge of local paleontology, and the minimum levels of experience and expertise as defined by the Society of Vertebrate Paleontology's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. If any paleontological resources or unique geologic features are encountered within the project site, the consulting paleontologist shall prepare a Paleontological Treatment and Monitoring Plan to include the methods that will be used to protect paleontological resources that may exist within the project site, as well as procedures for monitoring, fossil preparation and identification, curation of specimens into an accredited repository, and preparation of a report at the conclusion of the monitoring program.

Timing/Implementation: During construction involving drilling or excavations to depths of 3 feet or more.

Enforcement/Monitoring: Paleontological Monitor and Imperial Irrigation District.

VIII. GREENHOUSE GAS EMISSIONS

Would the project:

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

Less than Significant Impact. The proposed project would disturb the ground immediately surrounding the 50 poles to be replaced along the four-mile project area. Greenhouse gases (GHG) are generated by heavy equipment used during construction. Equipment used during construction would include boom trucks, bucket trucks, wire pulling trailers, rope pulling trailers, water truck, pickup truck, material handling trailers. The equipment would operate intermittently and continuously over a four-month construction period. Based on the limited duration of the project as well as mandatory compliance with ICAPCD rules (i.e., Rule 900, Procedures for issuing permits to operate for sources subject to title V of the federal clean air act amendments of 1990), the project is not anticipated to generate substantial GHGs. Therefore, generation of greenhouse gas emissions would be considered a less than significant impact.

- b) Conflict with an applicable plan or policy or ☐ ☐ ☒ ☐

regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less than Significant Impact. The City of Indio Climate Action Plan considers emissions reductions from various policies across several Elements, including Land Use and Urban Design, Mobility, Conservation, Safety, and Infrastructure and Public Facilities. Examples of these include proposed General Plan policies aimed at strategies for improving connectivity and land use patterns, improving transportation modes and systems, incorporating energy efficiency standards, increasing the City's renewable energy supply, and reducing solid waste (Rincon, 2019, p. 1). This project's intent is to increase the reliability aspect of the load-serving grid and is not specifically intended to increase the renewable energy interconnections or reduce GHGs. Therefore, impacts regarding an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of GHGs are considered less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? ☐ ☐ ☒ ☐

Less than Significant Impact. The project would not use or store any appreciable quantities of hazardous chemicals during demolition or construction. Diesel fuel, oil and hydraulic fluid would be present in association with heavy equipment used and staged on-site. However, the limited quantities of materials and the duration of construction would result in a less than significant impact regarding the creation of a hazard to the public through the routine transport, use, or disposal of hazardous materials.

- b) Create a significant hazard to the public or the environment through foreseeable upset and accident conditions involving the release of hazardous materials into the environment? ☐ ☐ ☒ ☐

Less than Significant Impact. The proposed 92-kV CA Line Upgrade project would replace 50 existing wooden poles and improve infrastructure within the footprint of the Northview and Avenue 42 Substations. Given the nature of the project as a replacement of existing facilities with similar but upgraded infrastructure, the impact from release of hazardous materials in the environment related to the operation of the project is considered less than significant.

Potential for release of hazardous materials from construction activities into the environment is low in relation to the type of construction to be performed and potential for release of materials (e.g., accidental spill of diesel, oil, or hydraulic fluid). Given the protocols required for the transport, handling and storage of these materials, potential for upset and accidental release of hazardous materials is considered less than significant.

- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? ☐ ☐ ☐ ☒

No Impact. The closest school to the project area is the Desert Ridge Academy, located approximately 0.5 miles to the east of pole replacement that would take place at the intersection of Avenue 39 and Adams Avenue. No impacts are identified, as no schools are located within one-quarter of a mile of the project.

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

☐	☐	☐	☒
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No Impact. A search of the State Water Resources Control Board's GeoTracker website identified one (1) Leaking Underground Storage Tank (LUST) Clean-up sites within one mile of the project site (GeoTracker, 2025). The site named, the Apple Market #5 LUST site was closed on 2/27/2008 and does not pose a hazard to the public or the environment. Therefore, no impact is identified.

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

☐	☐	☒	☐
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Less than Significant Impact. The Bermuda Dunes Airport is located across Interstate 10 from the project area and the closest portion of the project site is approximately 0.5 miles to the west of the airport. According to the City of Indio General Plan Update Final EIR (Rincon, 2019, Figure 4.8-3), a majority of the project site is located within the Primary Traffic Patterns and Runway Buffer Compatibility Zone and the Avenue 42 Substation is located within the Approach Surface Compatibility Zone. Despite the close proximity to the Bermuda Dunes Airport, the proposed project consists replacing 50 existing poles and improving infrastructure within the footprint of the Northview and Avenue 42 Substations and does not include any residential uses. Given the small number of staff required for the project and the short construction period, the construction and operations of the proposed project would not result in safety hazard or excessive noise for people residing or working in the project area. Therefore, this impact is considered less than significant.

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

☐	☐	☒	☐
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Less than Significant Impact. The project would temporarily disrupt traffic along the portions of the project area where power poles are adjacent to public streets. However, this disruption would be temporary, and the streets would remain unobstructed as the work would occur within the power line easements adjacent to the roadway. Additionally, electrical service would be maintained during the extent of the project construction. Thus, the proposed project would not impair the implementation of, or physically interfere with, any adopted emergency response plan or emergency evacuation plans. No impact is considered less than significant.

- g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or

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Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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death involving wildland fires?

Less than Significant Impact. According to the Riverside County State Responsibility Area Fire Hazard Severity Zones map prepared by the California Department of Forestry and Fire Protection (CalFire 2023), the proposed project is not identified as a Fire Hazard Severity Zone. Additionally, the City of Indio is not prone to any major wild land fires due to its desert environment, which does not support substantial amounts of brush. Therefore, the potential to expose people or structures to significant risk of loss, injury of death involving wildland fires is considered less than significant.

X. HYDROLOGY AND WATER QUALITY

Would the project:

- a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? ☐ ☐ ☒ ☐

Less than Significant Impact. The proposed 92-kV CA Line Upgrade project would replace 50 existing wooden poles and improve infrastructure within the footprint of the Northview and Avenue 42 Substations. Neither demolition nor construction activities are anticipated to violate waste discharge requirements or degrade water quality. Because more than one acre of soil would be disturbed as part of project construction, a Stormwater Pollution Prevention Plan (SWPPP) will be required. The SWPPP will identify Best Management Practices (BMPs) to ensure that no material is discharged or transported off-site during a rain event. The SWPPP would include measures such as silt fencing, fiber rolls, street sweeping, etc. to avoid impacts on water quality. Implementation of the SWPPP and compliance with BMPs will ensure that the project will not violate any water quality standards. A less than significant impact would occur.

- b) 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 includes the replacement of wood power poles to accommodate an upgrade in power lines and installation of upgraded equipment at the Avenue 42 and Northview Substations. The project itself would have minimal water demand during demolition and construction limited to dust control. During operations, the project would not require a water supply. Therefore, no impact would occur.

- 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: ☐ ☐ ☐ ☒

- i) Result in a substantial erosion or siltation on- or off-site.

No Impact. The proposed project includes the replacement of existing power poles and the

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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upgrading of existing substation facilities. The potential for erosion would be limited to exposed soils during construction. Soil may be stockpiled during construction but would be temporary and Best Management Practices would be employed including watering of exposed soil and installation of fiber rolls or silt fencing to prevent soil transport. No streams or rivers are adjacent to the project site that could be subject to siltation. No impact would occur regarding substantial erosion or siltation.

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

Less than Significant Impact. The proposed project is not anticipated to increase the amount of impervious surfaces as the proposed activity would consist of replacing existing power poles and upgrading existing IID facilities. No substantial increases in impervious surfaces are proposed and as a result, the project would have a less than significant impact regarding increasing the rate or amount of surface runoff 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? ☐ ☐ ☐ ☒

No Impact. The proposed project would not generate substantial amounts of runoff as described in item ii), above. Therefore, no impact would occur.

- iv) Impede or redirect flows? ☐ ☐ ☐ ☒

No Impact. The proposed pole replacement project extends four circuit miles between Northview Substation and Avenue 42 Substation. The path is located adjacent to existing roads including Avenue 38, Adams St., Avenue 40, and Avenue 42 and extends through the Sun City Shadow Hills Community. The existing poles will be replaced, and improvements will be made within the footprints of both substations. The project does not include new areas of construction or expansion and therefore, is not anticipated to impede or redirect surface runoff flows. No impact would occur.

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

No Impact. The proposed project site is approximately 20 miles northwest of the northern tip of the Salton Sea which is the nearest large water body. Due to the distance, the Salton Sea does not pose a significant danger of inundation from tsunami or seiche related to the project site. Thus, no impact is identified for these issues.

- e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? ☐ ☐ ☐ ☒

No Impact. During construction and operations, the proposed project would not result in the use of groundwater or inhibit the recharge of groundwater as the project would not result in a substantial increase of impervious surfaces. Therefore, the proposed project would have no impact on

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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implementation of a water quality control plan or sustainable groundwater management plan.

XI. LAND USE AND PLANNING

Would the project:

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

No Impact. The proposed 92-kV CA Line Upgrade project would replace 50 existing power poles and improve infrastructure within the footprint of the Northview and Avenue 42 Substations and would occur within the existing boundaries of the existing poles and the IID property. Thus, no impact is identified regarding dividing an established community.

- b) Conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? ☐ ☐ ☐ ☒

No Impact. The proposed 92-kV CA Line Upgrade project would replace 50 existing power poles and improve infrastructure within the footprint of the Northview and Avenue 42 Substations and is consistent with the existing uses currently on the site. Once completed, the project would improve the reliability of the existing IID electrical system. Therefore, no impacts would result related to conflicts with an applicable land use plan.

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? ☐ ☐ ☐ ☒

No Impact. The project site is in Mineral Resource Zone 1 on Figure 4.11-1 Mineral Resource Zones of the City of Indio General Plan Update Final EIR (Rincon, 2019, p. 4.11-4). Mineral Resource Zone 1 is defined by the California Department of Conservation as "Areas where available geologic information indicates that little likelihood exists for the presence of significant construction aggregate resources." Thus, no impact is identified as implementation of the proposed project would not result in the loss of availability of a known mineral resource.

- b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? ☐ ☐ ☐ ☒

No Impact. Refer to item a), above.

XIII. NOISE

Would the project result in:

- a) Generation of a substantial temporary or permanent increase in ambient noise levels in ☐ ☐ ☒ ☐

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less than Significant Impact. Construction of the proposed project would result in short-term, temporary noise with most of the noise occurring during the preliminary stages of pole replacement and site preparation. Construction activities would create temporary localized increases in noise levels from operation of on-site equipment as well as from delivery trucks hauling materials but would be short-term as the activities would move from pole to pole as they are replaced. The major construction activities for the proposed project would consist of excavation, compaction, and equipment installation. Construction noise impacts are the function of several factors including noise generated by equipment; location of the equipment relative to sensitivity of nearby land uses; and the time of day in which the construction activity takes place. All construction activities are temporary in nature and would adhere to the City of Indio Noise Ordinance, Section 95C.08, and take place during the hours of 7:00 a.m. to 6:00 p.m. during weekdays, 8:00 a.m. to 6:00 p.m. on Saturday and 9:00 a.m. to 5:00 p.m. on Sundays. The proposed project would not change the existing long-term operation activities nor increase noise levels in any substantial manner. Therefore, impacts resulting from generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project are anticipated to be less than significant.

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

Less than Significant Impact. Construction of the proposed 92-kV CA Line Upgrade project would replace 50 existing power poles and improve infrastructure within the footprint of the Northview and Avenue 42 Substations. Although the construction related to the pole replacement could generate some ground borne vibration it would not be considered excessive and is temporary in nature. Therefore, this impact is considered less than significant.

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

Less than Significant Impact. The Bermuda Dunes Airport is located across Interstate 10 from the project area and the closest portion of the project site is approximately 0.5 miles to the west of the airport. According to the City of Indio General Plan Update Final EIR (Rincon, 2019, Figure 4.12-2), a majority of the project site is located outside of the airport noise contours, with the exception of the Avenue 42 Substation which is in the 55-60 CNEL contour zone. The construction work is considered temporary in nature and upgrades would occur to an existing substation. Therefore, workers involved in project construction and equipment installation would not be exposed to excessive noise levels from the airport. This considered a less than significant impact.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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XIV. POPULATION AND HOUSING

Would the project:

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

No Impact. The proposed 92-kV CA Line Upgrade project would replace 50 existing power poles and upgrade infrastructure within the footprint of the Northview and Avenue 42 Substations. The project would improve the reliability of the existing IID electrical system. The project does not propose the development of new housing, nor does it propose construction or extension of new roads. Therefore, the proposed project would have no impact regarding inducing population growth.

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

No Impact. The proposed pole replacement project extends four circuit miles between Northview Substation and Avenue 42 Substation. The path is located adjacent to existing roads including Avenue 38, Adams St., Avenue 40, and Avenue 42 and extends through the Sun City Shadow Hills Community. The existing poles will be replaced, and improvements will be made within the footprints of both substations. As a result, the proposed project would not displace substantial numbers of existing housing or people requiring construction of replacement housing elsewhere. No impact would occur regarding the need for replacement housing.

XV. PUBLIC SERVICES

- a) 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, to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

- 1) Fire protection? ☐ ☐ ☒ ☐

Less than Significant Impact. The City of Indio serves the proposed project, Fire Station 4 located at 81-025 Avenue 40. The project is not anticipated to result in a substantial increase in demand for fire protection as the equipment proposed is made of metal and wood poles would be treated with fire retardant. None of the project components are flammable. Therefore, impacts to fire protection are considered less than significant.

- 2) Police Protection? ☐ ☐ ☐ ☒

No Impact. The Indio Police Department enforces local, state, and federal statutes to protect the general welfare of the community. The Chief of Police and three Divisions in the department administer enforcement. The proposed 92-kV CA Line Upgrade project would replace 50 existing power poles and upgrade infrastructure within the footprint of the Northview and Avenue 42 Substations. An increase in calls for police protection is not anticipated to increase substantially.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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because of the pole replacement of addition of the upgraded equipment. No impact is identified.

3) Schools? ☐ ☐ ☐ ☒

No Impact. The proposed project is not anticipated to impact schools because it neither includes a residential component nor would it generate the need for new housing to accommodate the workforce population. Therefore, no impact is identified for this issue area.

4) Parks? ☐ ☐ ☐ ☒

No Impact. The proposed project is not anticipated to impact parks because it neither includes a residential component nor would it generate the need for new housing to accommodate workforce population. Therefore, no impact is identified for this issue area.

5) Other Public Facilities? ☐ ☐ ☐ ☒

No Impact. The project would enable IID to provide a more reliable service for its existing electrical system. The project does not include any component that would increase demand for other public facilities such as a new school, park, or other public facility. No impact would occur.

XVI. RECREATION

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

No Impact. The proposed 92-kV CA Line Upgrade project would replace 50 existing power poles and upgrade infrastructure within the footprint of the Northview and Avenue 42 Substations. The project would not create demand for neighborhood or regional parks in the City of Indio. Thus, no impact is identified for these issues.

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

No Impact. The proposed 92-kV CA Line Upgrade project would replace 50 existing power poles and upgrade infrastructure within the footprint of the Northview and Avenue 42 Substations. The project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, no impact is identified.

XVII. TRANSPORTATION

Would the project:

- a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and ☐ ☐ ☐ ☒

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

No Impact. The City of Indio Noise Ordinance restricts demolition and construction to occur Monday through Friday from 7:00 a.m. to 6:00 p.m. Because the daily work shift starts at 7:00 a.m. and is anticipated to end no later than 6:00 p.m. during weekdays, trips generated by construction workers would occur during the AM and PM peak hour. However, construction related trips are temporary in nature and would not conflict with transportation related policies. Once completed, the project would generate 1 to 4 trips per day in association with daily operations. Given the temporary increase in traffic and minimal long-term operational traffic, the proposed project would have no adverse impact on a program, plan or ordinance addressing the circulation system.

- b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)? ☐ ☐ ☒ ☐

Less than Significant Impact. CEQA Guidelines Section 15064.3, subdivision (b), focuses on Vehicle Miles Traveled (VMT) as the criteria for determining the significance of transportation impacts. The proposed project includes the replacement of existing wood power poles to accommodate an upgrade in power lines and installation of upgraded equipment at the Avenue 42 and Northview Substations. Construction would generate temporary construction-related traffic. This project would be categorized under Section 15064.3, subdivision (b), qualitative analysis. Subdivision (b)(3) acknowledges that lead agencies may not be able to quantitatively estimate VMT for every project type. In these cases, Subdivision (b)(3) encourages lead agencies to evaluate factors such as the availability of transit, proximity to other destinations, and other factors that may affect the amount of driving required by the project.

Construction of the proposed project would result in a temporary increase in local traffic in association with demolition and construction-related workforce traffic and material deliveries. Once the project is completed, construction-related traffic would cease, and employee traffic associated with operation of the facility would resume (no new employees would be needed to operate the facility). Therefore, the proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Impacts to VMT are considered less than significant.

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

No Impact. The proposed 92-kV CA Line Upgrade project would replace 50 existing power poles and upgrade infrastructure within the footprint of the Northview and Avenue 42 Substations. No changes to the traffic patterns or land uses would result from the proposed project. No impact would occur.

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

No Impact. The proposed project would result in temporary increases in temporary construction traffic along the areas of power poles that will be replaced. However, any traffic would be minimal and temporary. Therefore, the project would not present any emergency access issues to surrounding residential and agricultural uses. No impact would occur regarding emergency access

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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XVIII. TRIBAL CULTURAL RESOURCES

- a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place or object with cultural value to a California Native American tribe, and that is:

☐	☒	☐	☐
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Potentially Significant Impact Unless Mitigation Incorporated. The proposed project includes the replacement of existing wood power poles to accommodate an upgrade in power lines and installation of upgraded equipment at the Avenue 42 and Northview Substations. The project is located within the boundaries of the existing IID power pole easements and property of the substations. All these areas have been previously disturbed in association with construction of the existing IID facilities.

Tribal Consultation was performed as required under AB 52. Tribal letters are included in Appendix G. Four tribes responded as follows:

- Claritsa Duarte, Cultural Resource Analyst, Aqua Caliente Band of Cahuilla Indians (Ms. Duarte indicated that the area is within the tribe's Traditional Use Area and that a records check of the ACBCI registry indicates the project area has not been surveyed for cultural resources. Ms. Duarte provided comments and recommendations which are included as mitigation measures.
- H. Jill McCormick, Ft. Yuma Quechan Indian Tribe (Did not request consultation).
- Cheryl Madrigal, Cultural Resources Manager, Rincon Band of Luiseno Indians (Did not request consultation; deferred consultation with the Cahuilla tribes).
- Eunice Ambriz, Cultural Resources Technician, Yuhaaviatam San Manuel Nation (Indicated that the project area is outside the Serrano ancestral territory and is not requesting consultation).

Standard protocols will also be implemented during construction, including a Worker Environmental Awareness Program which trains construction workers to halt work if they identify any resources during excavation and other earthmoving activities. However, based on comments received from the Agua Caliente Band of Cahuilla Indians, including concerns regarding the presence of a Tribal Cultural Resource, this impact is considered potentially significant unless mitigation is incorporated.

Mitigation Measures

MM TRC-1 The following actions shall be taken to address concerns regarding the culturally sensitive area and Tribal Cultural Resource near the project site.

- A Cultural Resource Technical Report shall be prepared by a qualified archaeologist, including a cultural resources inventory of the project area and a cultural records search with associated survey reports and site records from the appropriate information center.

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- A copy of the records search with associated survey reports and site records from the information center shall be provided to the Agua Caliente Band of Cahuilla Indians.
- Copies of any cultural resource documentation (report and site records) generated in connection with this project shall be provided to the Agua Caliente Band of Cahuilla Indians.
- An approved Cultural Resource Monitor(s) shall be present during any ground disturbing activities (including archaeological testing and surveys). Should buried cultural deposits be encountered, the Monitor may request that destructive construction halt and the Monitor shall notify a Qualified Archaeologist (Secretary of the Interior's Standards and Guidelines) to investigate and, if necessary, prepare a mitigation plan for submission to the State Historic Preservation Officer.
Formal government to government consultation shall occur as specified under California Assembly Bill No. 52 (AB-52).

Timing/Implementation: Prior to any development activities and during ground disturbing activities.

Enforcement/Monitoring: Imperial Irrigation District in coordination with the Agua Caliente Band of Cahuilla Indians.

Following implementation of mitigation measure TRC-1, impacts would be reduced to less than significant levels.

- i.) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as define in Public Resources Code Section 5020.1(k), or
- ☐ ☐ ☐ ☒

No Impact. The proposed project does not contain any structures that could be eligible for registration in the California Register of Historical Resources or local registry. No impact would occur.

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

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Potentially Significant Impact Unless Mitigation Incorporated. Refer to item "a," above.

XIX. UTILITIES AND SERVICE SYSTEMS

Would the project:

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

Less than Significant Impact. The proposed 92-kV CA Line Upgrade project would replace 50 existing power poles and upgrade infrastructure within the footprint of the Northview and Avenue 42 Substations. The environmental effects of these activities are analyzed in this document. No other new or expanded water or storm water drainage, electric power, natural gas, or telecommunications facilities would be required. The proposed project would improve the reliability of IID's existing electrical system. All impacts can be reduced to less than significant levels with mitigation incorporated.

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

No Impact. The proposed project would require a minimal amount of water during construction to control dust and would not be at a level that would impact the available water supplies. Once operational, the project will not require any new water usage. Therefore, no impacts to water supply will result.

- 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?
- ☐ ☐ ☐ ☒

No Impact. The proposed project would not produce or increase the amount of wastewater requiring treatment. Portable toilets would be used for workers during construction. No impact would occur regarding wastewater treatment.

- d) Generate solid waste more than state or local standards, or more than the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
- ☐ ☐ ☐ ☒

No Impact. The proposed project would generate demolition waste and construction waste. This would be temporary and would be hauled and disposed of at a local landfill licensed to accept

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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demolition and construction waste. Once construction is complete, the project is anticipated to produce minimal waste by the employees operating the facility. Therefore, no impact to solid waste would occur.

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

No Impact. Refer to item d) above.

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- a) Substantially impair an adopted emergency response plan or emergency evacuation plan? ☐ ☐ ☐ ☒

No Impact. The proposed 92-kV CA Line Upgrade project would replace 50 existing power poles and upgrade infrastructure within the footprint of the Northview and Avenue 42 Substations. The project would require minimal and temporarily disruptions to traffic along the four circuit miles of power lines that are adjacent to public streets while the poles are being replaced. However, this disruption would be temporary, and the streets would remain unobstructed as the work would occur along the power line easements adjacent to the roadway. Additionally, electrical service would be maintained during the extent of the project construction. Thus, the proposed project would not impair the implementation of, or physically interfere with, any adopted emergency response plan or emergency evacuation plans. No impact is identified for this issue area.

- 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? ☐ ☐ ☐ ☒

No Impact. The potential for uncontrolled wildfire is unlikely given topography, lack of vegetation and existing surrounding uses including irrigation canals. The project does not include habitable structures. Therefore, no impact would occur regarding exposing project occupants to pollutant concentrations from 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 risk or that may result in temporary or ongoing impacts to the environment? ☐ ☐ ☐ ☒

No Impact. The proposed project would replace existing power poles and upgrade existing IID infrastructure. Because the project does not expand or create infrastructure beyond existing facilities and is within the boundaries of the existing IID property the proposed project would be

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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unlikely to exacerbate wildfire risks. Therefore, no impact is identified.

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

No Impact. The proposed project is located on flat land in the City of Imperial. No impact would occur that would result in exposing people or structures to significant risks, including downslope or downstream flooding or landslides, because of runoff, post-fire slope instability, or drainage changes.

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

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

SECTION 3

III. MANDATORY FINDINGS OF SIGNIFICANCE

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

- a) Does the project have the potential to 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?
- ☐
☐
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No Impact. The proposed project includes the replacement of existing wood power poles to accommodate an upgrade in power lines and installation of upgraded equipment at the Avenue 42 and Northview Substations. The area impacted by the construction is entirely within an area which has been completely disturbed by existing IID facilities as well as previously disturbed land. As a result, the project would have no impact with regard to degrading the quality of the environment, substantially reducing 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.)
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No Impact. Due to the short-term and temporary nature of construction and minimal change in emissions during operation, no significant individual or cumulative impacts to air quality or greenhouse gas emissions are anticipated. No other individual projects would result in a cumulative impact regarding any other resource areas discussed in this document. In conclusion, the proposed project would have no individually or cumulatively considerable impacts.

- c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?
- ☐
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No Impact. As described in items a and b, the proposed project is in an area that has been previously disturbed. Construction impacts are short term and would not result in any long-term increases in air emissions which could be harmful to human beings. Once completed, the project would not increase air emissions or any other hazard to human beings. No other significant impacts have been identified in this analysis which could result in adverse impacts to human beings.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Therefore, no impact is identified regarding the project having a substantial adverse effect on human beings directly or indirectly.

IV. PERSONS AND ORGANIZATIONS CONSULTED

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

A. IMPERIAL IRRIGATION DISTRICT

Donald Vargas Pinera, Compliance Administrator II

Andres S Avila, Senior Project Manager

B. AGENCIES/ORGANIZATIONS

California Department of Fish and Wildlife

United States Department of Fish and Wildlife

C. ENGINEER AND TECHNICAL STUDIES

Argonaut Ecological Consulting, Inc. – Biological Study

Peak & Associates, Inc. – Cultural Resources Assessment

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

V. REFERENCES

Argonaut Ecological Consulting Inc. 2025. Biological Resource Assessment for the Line Replacement Project, Imperial Irrigation District, 92KV Transmission Line Upgrade North View Substation to Avenue 42 Substation, Indio, California. April 14, 2025. Referenced in text as (Argonaut 2025)

[California State Scenic Highways | Caltrans](https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways) <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways> Accessed March 8, 2025. Referenced in text as (Caltrans 2025).

California Department of Conservation. <https://maps.conservation.ca.gov/dlrp/ciff/> Accessed March 8, 2025. Referenced in text as (DOC 2025).

Peak & Associates, Inc., 2025. Cultural Resource Assessment for the Proposed Imperial Irrigation District Project. April 14, 2025. Referenced In Text As (Peak 2025).

Rincon, 2019. City of Indio, General Plan Update Final EIR. October 2014. Referenced in text as (Rincon, 2019).

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CALFIRE, 2009. Very High Fire Hazard Severity Zones In LRA, Western Riverside County https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/osfm-website/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-map/upload-5/fhszl_map60.pdf