



CEQA Initial Study

Red Hill Bay Best Available Control Measure Project

February 2026

Lead Agency:

Imperial Irrigation District
P.O. Box 937
333 E. Barioni Boulevard
Imperial, California 92251

Technical Assistance Provided by:

Stantec Consulting Services Inc.
300 North Lake Avenue, Suite 1080
Pasadena, California 91101

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C	Soiltac® Safety Data Sheet

Section 1

Project and Agency Information

1.1 PROJECT TITLE AND LEAD AGENCY

Project Title: Red Hill Bay Best Available Control Measure Project

Lead Agency Name: Imperial Irrigation District

Lead Agency Address: P.O. Box 937
333 E. Barioni Boulevard
Imperial, California 92251

Contact Person: Ms. Jessica Humes

Contact Phone Number: (760) 339-9703

Project Sponsor: Same as Lead Agency

1.2 INTRODUCTION

The Imperial Irrigation District (IID) provides water and energy service within a 6,471-square mile service area, including all of Imperial County and parts of Riverside and San Diego counties. IID serves over 150,000 customers and provides water to over 500,000 acres of Imperial County farmland. Central to the service area is the Salton Sea, California's largest inland body of water. Due to reduced inflows to the Sea, additional shoreline is becoming exposed over time. Exposure of the playa at the shoreline has the potential to increase emissions of particulate matter 10 microns in diameter or less (PM₁₀). The objective of the Red Hill Bay Best Available Control Measure (BACM) Project (Project) is to control PM₁₀ emissions on IID-owned lands at Red Hill Bay adjacent to the Salton Sea in compliance with the Stipulated Order for Abatement (May 2, 2022) between IID and Imperial County Air Pollution Control District (ICAPCD). The Imperial County Board of Supervisors serves as the governing District Board for the ICAPCD. The ICAPCD is the local regulatory agency with the mission to protect the people and environment of Imperial County from the effects of air pollution.

IID has prepared this Initial Study (IS) to address the impacts of construction and operation of the Project. The IS has been prepared in accordance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq., and the State CEQA Guidelines, Title 14 California Code of Regulations (CCR) Section 15000 et seq. The IS identifies the site-specific impacts, evaluates their potential significance, and determines the appropriate document needed to comply with CEQA. For this Project, IID has determined, based on the information reviewed and contained herein, that the proposed Project would not have a significant environmental impact with mitigation measures incorporated into the Project. Based on this IS, a Mitigated Negative Declaration (MND) is the appropriate CEQA document for evaluating the potential environmental impacts of the Project.

Section 1 – Project and Agency Information

1.3 PROJECT LOCATION AND ENVIRONMENTAL SETTING

1.3.1 Location

The 584-acre Project site is located on IID-owned property adjacent to Red Hill Park on the Salton Sea playa near Calipatria in Imperial County, California (Figure 1). The property is located in the southern half of Section 22 of Township 11 South, Range 13 East and the northern half of Section 27 of Township 11 South, Range 13 East, San Bernardino Base and Meridian, as depicted on the 2021 U.S. Geological Survey (USGS) Niland 7.5-minute topographic quadrangle. It is located on Assessor's Parcel Numbers (APN) 020-100-032, 020-100-042, and 020-100-023.

1.3.2 Project Site and Adjacent Uses

The Project site is mostly open space with the Alamo River to the north, agricultural fields and Garst Road to the east, agricultural fields and Sonny Bono Salton Sea U.S. Fish and Wildlife Service (USFWS) Wildlife Refuge to the south, and open playa (with existing dust control) and the Salton Sea to the west. The Project site is currently leased for geothermal and lithium development. Vehicular and well drilling access for IID's lessee would be maintained as part of the Project. Approximately 400 acres of the playa surface of the Project site has been plowed to create furrows perpendicular to the prevailing high winds. This surface roughening was conducted to minimize dust emissions prior to implementation of the Project. Two existing vegetated wetland areas (approximately 81.6 acres combined as of 2024) exist in the southern portion of the Project site. These areas are comprised primarily of iodine bush (*Allenrolfea occidentalis*) and salt cedar (*Tamarix ramosissima*).

1.3.3 Surface Water Features

The Project site was inundated with Sea water from the late 1940s until around 2012 to 2014 when it was fully exposed due to a reduction in drain flows to the Sea. Due to berms, roads, and other features, the site is hydraulically inaccessible to all overland flood flows, with the exception of the northwest Project area which receives uncontrolled surface runoff from Red Hill. The remainder of the site only receives direct precipitation, estimated at less than 3.5 inches annually (Weather Spark 2026).

In the southeast corner of the site, there are discharges of surface flows originating from upslope agricultural lands. These flows are variable and the actual volume discharged is unquantified. Drainage water is currently conveyed through the Project site in two ditches:

- The Center Ditch starts in the southeast corner of the Project site, bisects the Project area, and outfalls into a borrow pit area located along the western Project boundary. The borrow pit area is not connected to the Southern Ditch.
- The Southern Ditch conveys drainage along the southern boundary of the site and beyond the western Project boundary. Currently these flows maintain the wetland vegetation in the southern portion of the site. Although there is existing surface drainage, the facilities are not sufficiently maintained to allow all non-consumptively used flows to drain to the west following the surface drain. The excess flow maintains a very shallow water table downslope of the vegetation with water visible within a few inches of the surface.

1.3.4 Environmental Setting

The weather in Calipatria is generally clear year-round, characterized by very hot, arid summers and cool, dry winters. Because of its southern latitude, elevation, and desert location, the area experiences some of the highest temperatures in the nation. Over the course of the year, the temperature typically varies from 43 degrees Fahrenheit (°F) to 107°F and is rarely below 35°F or above 113°F (Weather Spark 2026).

Flora within the Project area can be categorized by vegetation alliances, which are characterized by patterns of plants across a landscape. Each alliance is defined by plant species composition and reflects the effects of local climate, soil, water, disturbance, and other environmental factors (Sawyer et al. 2009). Vegetation within the Project area is consistent with Cattail marsh (*Typha [angustifolia, domingensis, latifolia]* herbaceous alliance), Iodine bush scrub (*Allenrolfea occidentalis* shrubland alliance), and semi-natural stands of giant reed and Tamarisk thickets (*Arundo donax* and *Tamrisk spp.*). The majority of the Project area is disturbed playa.

Fauna in the Project area includes invertebrates and gastropods, reptiles, birds, and mammals. Common invertebrates and gastropods include beetles (*Coleoptera spp.*), flies (*Diptera spp.*), grasshoppers (*Orthoptera spp.*), crickets (*Gryllidae spp.*), isopods (*Isopoda spp.*), snails (*Gastropoda spp.*), spiders (*Araneae spp.*), moths and butterflies (*Lepidoptera spp.*), bees (*Apis spp.*), and ants (*Hymenoptera spp.*). Common reptiles include side-blotched lizard (*Uta stansburiana*) and western fence lizard (*Sceloporus occidentalis*). Common birds include house finch (*Haemorrhous mexicanus*) and black phoebe (*Sayornis nigricans*). Common mammals include coyote (*Canis latrans*), desert cottontail (*Sylvilagus audubonii*), round-tailed ground squirrel (*Xerospermophilus tereticaudus*), kangaroo rat (*Genus Dipodomys spp.*), striped skunk (*Mephitis mephitis*), and raccoon (*Procyon lotor*).

1.4 PROJECT OBJECTIVE

The objective of the Project is to control dust emissions on the Project site by application of soil stabilizers over a majority of the Project site in compliance with the Stipulated Order for Abatement between the IID and ICAPCD. BACM are defined by ICAPCD Regulation VIII, Fugitive Dust Rules. Rule 804 identifies four individual dust control measures accepted as BACM for fugitive dust on open areas, including F.1.c – Pave, apply and maintain Gravel, or apply and maintain Chemical Stabilizers/Suppressants (ICAPCD 2018).

1.5 PROJECT DESCRIPTION

The Project would reduce dust emissions by applying a commercially available chemical stabilization product to protect the surface from wind erosion. After assessing several surface stabilizer products, IID has identified Soiltac® as an effective chemical stabilizer for the playa soils of the Project site. Application of soil stabilizer would not occur within 300 feet of existing vegetated wetlands and ditches. Temporary resource protection berms would be installed to protect onsite wetlands from construction of the dust control project (Figure 2).

Section 1 – Project and Agency Information

1.5.1 Soil Stabilizer

Soil Stabilizer Selection. IID evaluated five commercially available surface stabilizer products using playa soils. A control with water (wet control) and a dry control were also evaluated. A calibrated backpack sprayer (Jacto PJB) was used to apply the treatments to 16-inch-diameter hog pans. After the treatments cured according to manufacturer recommendations, their soil-stabilizing capabilities were evaluated based on 1) emission potential of particulate matter (expressed as PM₁₀) with the PI-SWERL¹ and 2) surface crust strength measured with a soil penetrometer. Results indicate Soiltac® as the best performing product. The study approach and results are detailed in the 2020/2021 Proactive Dust Control Plan (PDCP, IID 2022). In June 2024, IID applied Soiltac® to approximately 14 acres in an area directly upwind of the Project site. Monitoring to date (the study is ongoing) indicates the product is performing well after 18 months, exceeding 70 percent control effectiveness as compared to background (uncontrolled) conditions.

Soiltac® soil stabilizer is an ecologically safe, biodegradable, synthetic vinyl copolymer used to stabilize and solidify soils to protect against wind and water erosion. The copolymer molecules coalesce to form cross-linked bonds between soil particles, generating a three-dimensional crust (Soilworks 2022). The surface crust that is created is water-resistant, durable, and non-emissive, especially at higher application rates. Surface stabilizer performance will vary based on soil type, application rate and duration, precipitation, and disturbance. The typical life span of Soiltac® is reported to be 12 to 24 months based on the recommended application rate. Soiltac® is not a hygroscopic material.

Application Area. Portions of the Project site are periodically inaccessible due to saturated soils or standing water. Additionally, existing vegetation and ditches/drains will be avoided with a 300-foot minimum buffer. The remaining area, approximately 334 acres, is proposed for surface stabilizer application (Figure 2).

Application Method. Soiltac® will be applied using the recommended raw product application rate from the manufacturer (275 gal/acre) and a water dilution factor of approximately eight, resulting in a final application rate of approximately 2,500 gallons/acre. The Soiltac® product will be blended with water inside a temporary storage tank (Figure 3) and applied to the Project area with an articulated water truck (Figure 4) or an in-field applicator (e.g., hose reel and irrigation boom) (Figure 5). Application would include:

- **Surface Stabilizer Product Transport and Storage.** The surface stabilizer will be delivered as a concentrate to the Project site in semi-tankers. Up to 20 semi-tankers will travel approximately 265 miles from Casa Grande, Arizona. The product would be stored in one temporary storage tank, located within a secondary containment device.
- **Water Transport and Storage.** Up to 850,000 gallons of water would be supplied by a temporary suction pump in IID's Vail 3 Drain. Semi-truck trailers or on-road water trucks would be used to transport water from Vail 3 Drain to the in-field staging area. The trucks would travel approximately 1 mile north along Garst Road (Figure 6). The semi-truck trailer capacity is approximately 7,000 gallons and the on-road water truck capacity is

¹ The Portable In-Situ Wind EROsion Laboratory, or PI-SWERL, simulates shear stress at the soil surface at various wind speeds to determine the potential of a surface to emit windblown PM₁₀.

Section 1 – Project and Agency Information

approximately 4,000 gallons. If semi-trucks are used, then the Project may include up to 10 truck trips per day for 30 working days. If on-road water trucks are used, then the Project may include up to 14 truck trips per day for 30 working days.

- **Product Dilution.** The soil stabilizer would be blended with raw water in one temporary storage tank located within a secondary containment device.
- **Option 1 - In-field Application with Water Truck.** The capacity of the articulated water truck is estimated at 6,000 gallons. To manage traffic flow, the water trucks may be only partially filled. Assuming a range of 3,000 to 6,000 gallons/truck, approximately 200 in-field truck trips would be required to apply the stabilizer. Assuming 2 acres/truck trip and six truck trips/day, up to 30 working days are anticipated.
- **Option 2 - In-field Application with Hose Reel and Irrigation Boom.** Two to three tractors over approximately 12 to 16 weeks would be required for this option. If the hose reel and irrigation boom are used, site preparation would be necessary to facilitate product application. This may include collapsing surface roughening in the following locations: 1) an approximately 50-foot width along the northern Project boundary and access road, 2) approximately 20-foot width along the proposed access routes, and 3) other incidental areas necessary for equipment access. Minor earthwork may be completed to facilitate access near the south end of the borrow pit.
- **Equipment Flushing.** Application equipment with blended water will be flushed with fresh water. The flush water will be spread in a similar manner to the surface stabilizer application at the end of each workday. The storage tank used for blending will be flushed only when the tank is empty of product (e.g., at the end of product application).
- **Application Timing.** Application will not occur during precipitation events. The weather forecast will be monitored using National Weather Service forecast models to ensure application does not proceed if there is precipitation forecasted within 24 hours. Once cured (24 hours), Soiltac® is non-dissipating and will not wash away with water.
- **Spill Control.** The temporary storage tanks used for product storage and blending will be located within secondary containment for accidental leaks and minor fitting leaks. The secondary containment will have the capacity to contain 4 percent of the full tank volume, which provides protection for minor fitting leaks. Examples of secondary containment devices include Rain for Rent E-CONTAIN® or high wall spillguards, hose spill guards, and coupling spill guards.
- **Resource Protection Berms.** To protect the onsite ditches and wetlands against spills from the application apparatus resulting in runoff, 18-inch-tall resource protection berms will be installed as close as practical to the 300-foot buffer. Actual pushup berm locations will be based on constructability, with the main factor being soil moisture conditions. The soil stabilizer would not be applied to the resource protection berms.

Section 1 – Project and Agency Information

1.5.2 Access Routes

Graded access routes (at grade, unpaved) are proposed around select BACM areas (Figure 2). Additionally, the existing 20-foot access road may be improved with an 8-inch layer of California Department of Transportation (Caltrans) Class II aggregate base (up to 2,130 cubic yards (CY) of base). Up to 285 truck trips would be required to deliver aggregate to the site.

1.5.3 Staging Areas

Two staging areas are identified to support implementation, including an in-field staging area. [A third staging area was considered at the northwest corner of the site but was eliminated from the Project description due to the presence of burrowing owls.] The in-field staging area (approximately 1.4 acres) will be used for surface stabilizer product storage, water storage, product mixing, equipment storage, equipment parking, and a temporary portable restroom for employees. Three storage tanks are anticipated: one for raw water, one for stabilizer product, and one for blended product. An 8-inch layer of Caltrans Class II aggregate base (up to 1,550 CY of base) may be installed at the in-field staging area.

The northern staging area (Figure 2) will provide overflow staging to be used as needed. If the northern staging area is required, a portion of the existing surface roughening may be collapsed.

1.5.4 Construction Schedule

Construction (and maintenance) activities would be limited to the hours of 7:00 a.m. to 7:00 p.m., Monday through Friday, and 9:00 a.m. to 5:00 p.m. Saturday. No construction or maintenance operations would be conducted on Sunday or holidays. The maximum construction period is estimated to be 16 weeks, although the construction duration may be longer if activities are paused due to heat.

1.6 MONITORING AND MAINTENANCE

During the application period, the integrity of the resource protection berms would be monitored to ensure containment of the applied stabilizer product. Once application is complete, dust control effectiveness would be monitored. Based on testing to-date, the surface stabilizer is anticipated to perform well on all soil types across the Project site. However, over the long-term, surface stabilizer longevity and performance could potentially vary based on soil type, precipitation, and any disturbance (e.g., sand deposition on the edges of the Project, or other disturbance events). Therefore, soils where the surface stabilizer is applied would be monitored with multiple lines of evidence, consistent with the approach for dust control performance monitoring in the Salton Sea Air Quality Mitigation Program.

Monitoring methods will include the following: emission potential with the PI-SWERL, ground-based sand motion sensors (e.g., Cox Sand Catchers and SANTRIs), upwind-downwind PM₁₀ monitoring, plume opacity observations, and visual surveillance (e.g., Roundshot cameras). A brief description of each method is discussed below.

- **PI-SWERL.** The Portable In-Situ Wind EROsion Laboratory, or PI-SWERL, simulates shear stress at the soil surface at various wind speeds to determine the potential of a surface

Section 1 – Project and Agency Information

to emit windblown PM₁₀. Sampling locations will vary across the site to assess controlled versus uncontrolled conditions.

- **Upwind-downwind PM₁₀ monitoring:** Upwind-downwind PM₁₀ monitors are strategically positioned upwind and downwind from the surface stabilized area to determine the effectiveness of dust control. In general, the difference in upwind and downwind PM₁₀ concentrations provides an indicator of dust control performance in the intervening “controlled” area. If the difference is low or the downwind monitor measures substantially less than the upwind monitor, then it is an indicator that the dust control measure is performing well. Whereas, if the downwind monitor measures substantially higher concentrations than the upwind monitor, then it is an indicator that maintenance may be necessary. IID has been using both BGIs and DustTrak units to measure upwind/downwind PM₁₀. The BGI and DustTrak measure PM₁₀ concentrations on a 24-hour and 1-hour temporal resolution, respectively.
- **Sand Flux Sensors.** Environmental sensors are used to measure real-time horizontal sand fluxes. These sand flux monitors are ground-based, quantitative, and temporally continuous. When included as part of a larger network, the data generated can be used to evaluate DCM performance. Monitor types include:
 - Cox Sand Catchers (CSC), vertical tubes that physically trap saltating particles at 15 centimeters (cm) above the soil surface (units: mass), and
 - SANTRIs, particulate samplers that measure horizontal motion of saltating particles using optical gate sensors (units: counts per second).

Hourly data from the SANTRI units can be used to resolve the cumulative sand masses from the CSCs to an hourly sand flux estimate (mass per unit area per unit time).

- **Visual Surveillance and (United States) Environmental Protection Agency (EPA) Method 9 Plume Opacity Observations.** Although not quantitative, visual surveillance is an effective and intuitive method of performance monitoring. Field cameras are straightforward to operate, provide continuous dust monitoring, and do not require numerical data processing for interpretation. When cameras are mounted at an appropriate height and location, they can also be panned to provide a 360-degree field of view (i.e., Roundshot cameras), and in so doing each image represents a spatially comprehensive record for a site. Experience to-date has demonstrated that visual surveillance images can capture dust plumes as they are emitted from source areas within visual range of the camera position. In addition to the continuous visual surveillance, high wind event-based EPA Method 9 plume opacity observations will be conducted up to three times per year by a certified plume reader.

Based on performance monitoring results, the surface stabilizer may be reapplied in portions of the site or an alternative BACM may be implemented. Based on existing information, reapplication in portions of the site would be anticipated after 2 to 5 years. Reapplication would be performed in a manner similar to initial application.

Section 1 – Project and Agency Information

1.6.1 Access Roads

Access routes may require periodic maintenance to flatten ruts, restore stability, or repair washouts. Access routes would be maintained, as required, with a roader grader or tractor with a scraper. If necessary, water would be applied to the access routes with a water truck.

1.6.2 Best Management Practices

The following best management practices (BMP) would be implemented during Project construction:

- Equip diesel powered construction equipment with particulate matter emission control systems, where feasible.
- Use paved roads to access the construction sites when possible.
- Minimize the amount of disturbed area and apply water periodically to areas undergoing ground-disturbing activities.
- Limit vehicular access to disturbed areas and minimize vehicle speeds to no greater than 10 miles per hour (mph) on unpaved travelways.
- Reduce ground disturbing activities as wind speeds increase. Suspend grading during sustained high wind events (i.e., a period or periods of time aggregating more than 3 minutes in any 60-minute period) greater than 20 mph.
- Designate personnel to monitor dust control measures to ensure effectiveness in minimizing fugitive dust emissions.

1.7 APPLICABLE PLANS AND POLICIES

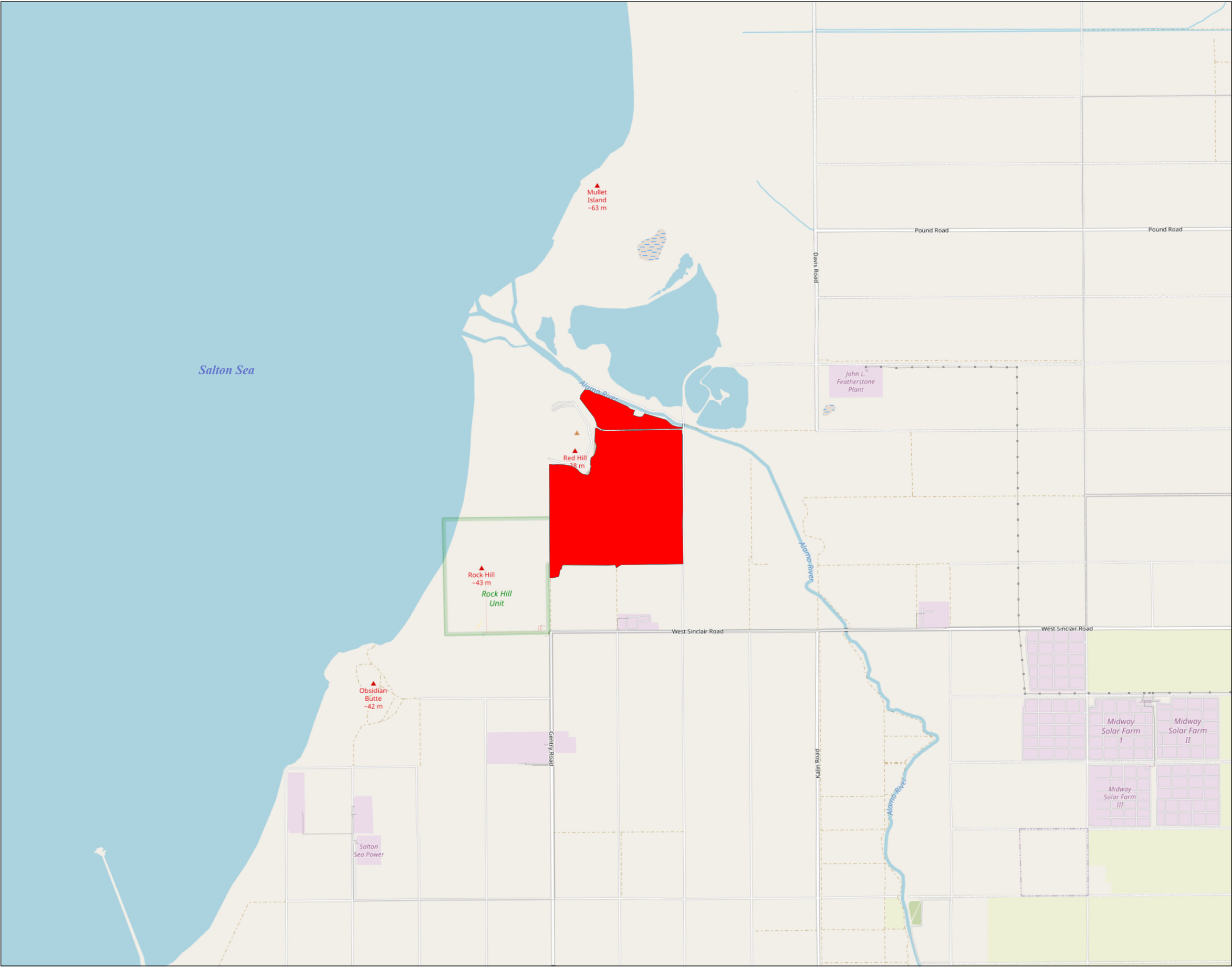
The Imperial County General Plan (1993, and as amended) provides a balance of land use policies and programs which seek to maintain the "quality of life" in the region. The Project site is located on IID-owned land in Imperial County within the Salton Sea Known Geothermal Resource area and the Draft Lithium Valley Specific Plan area (Imperial County 2025b). Existing zoning by Imperial County on the site is open space/recreation, geothermal overlay (S-1-G), heavy agriculture, geothermal overlay (A-3-G), heavy agriculture, renewable energy overlay (A-3-RE), and open space/recreation, renewable energy overlay (S-1-RE) with land use designations of Recreation/Open Space, Agricultural, and Government/Special Public (Imperial County 2025a). The majority of the site is designated as Salton Sea. The Renewable Energy (RE) Overlay Zone consists of: 1) the Geothermal Energy overlay for areas where existing and future development has been environmentally reviewed for geothermal renewable energy facilities and, 2) the Renewable/Geothermal overlay for areas that could be developed with any form of renewable energy technology, including geothermal production (Imperial County Title 9 Division 17).

1.8 PROJECT APPROVALS

The Project would install, operate and maintain approved BACM in areas identified by ICAPCD as requiring dust mitigation. Permits and approvals from other agencies are anticipated to include:

- Construction would be completed in compliance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order 2022-0057-DWQ, NPDES NO. CAS000002). Per the General Permit, a Stormwater Pollution Prevention Plan (SWPPP) incorporating BMPs for erosion control would be developed and implemented during Project construction.
- As applicable, an Overweight Transportation Permit would be obtained from Caltrans for transportation of heavy construction equipment and/or materials which requires the use of oversized/overweight vehicles on State highways. Per Caltrans General Rule 35550(a), the gross weight on any one axle shall not exceed 20,000 pounds, and the gross weight upon any one wheel, or wheels, supporting one end of an axle, shall not exceed 10,500 pounds.
- As applicable, the owner of a portable diesel engine must obtain a California Air Resources Board Portable Equipment Registration Program registration or an ICAPCD permit for temporary use during Project construction. The Project would also comply with ICAPCD Rule 401 which requires construction projects to incorporate fugitive dust reduction measures.
- Significant impacts to special status species or other biological resources are not anticipated for the Project (see Section 2.3.4). However, if special status species are observed prior to or during construction of the Project, notifications to the California Department of Fish and Wildlife (CDFW) and/or USFWS would be made as applicable.
- The Project site includes waters and wetlands potentially under the jurisdiction of the CDFW and Colorado River Basin Regional Water Quality Control Board (RWQCB). As designed, the Project would avoid construction activity and application of soil stabilizers within 300 feet of on-site wetlands and ditches.
- As applicable, IID will apply for an Encroachment Permit to the County of Imperial Department of Public Works Construction Engineering Division for use of County roads for transportation of aggregate and soil stabilizer to the Project site.

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Stantec

 Project Area



N

0 4,000 8,000 Feet

(At original document size of 11x17)

1:48,000

Notes

1. Coordinate System: NAD 1983 StatePlane California VI FIPS 0406 Feet
2. Data Sources: Stantec 2024.
3. Background: OpenStreetMap: © OpenStreetMap (and) contributors, CC-BY-SA
World Ocean Base: Esri, GEBCO, Garmin, NaturalVue
World Ocean Reference: Esri, GEBCO, Garmin, NGS



Project Location

Calipatria
Imperial County, California

Client/Project

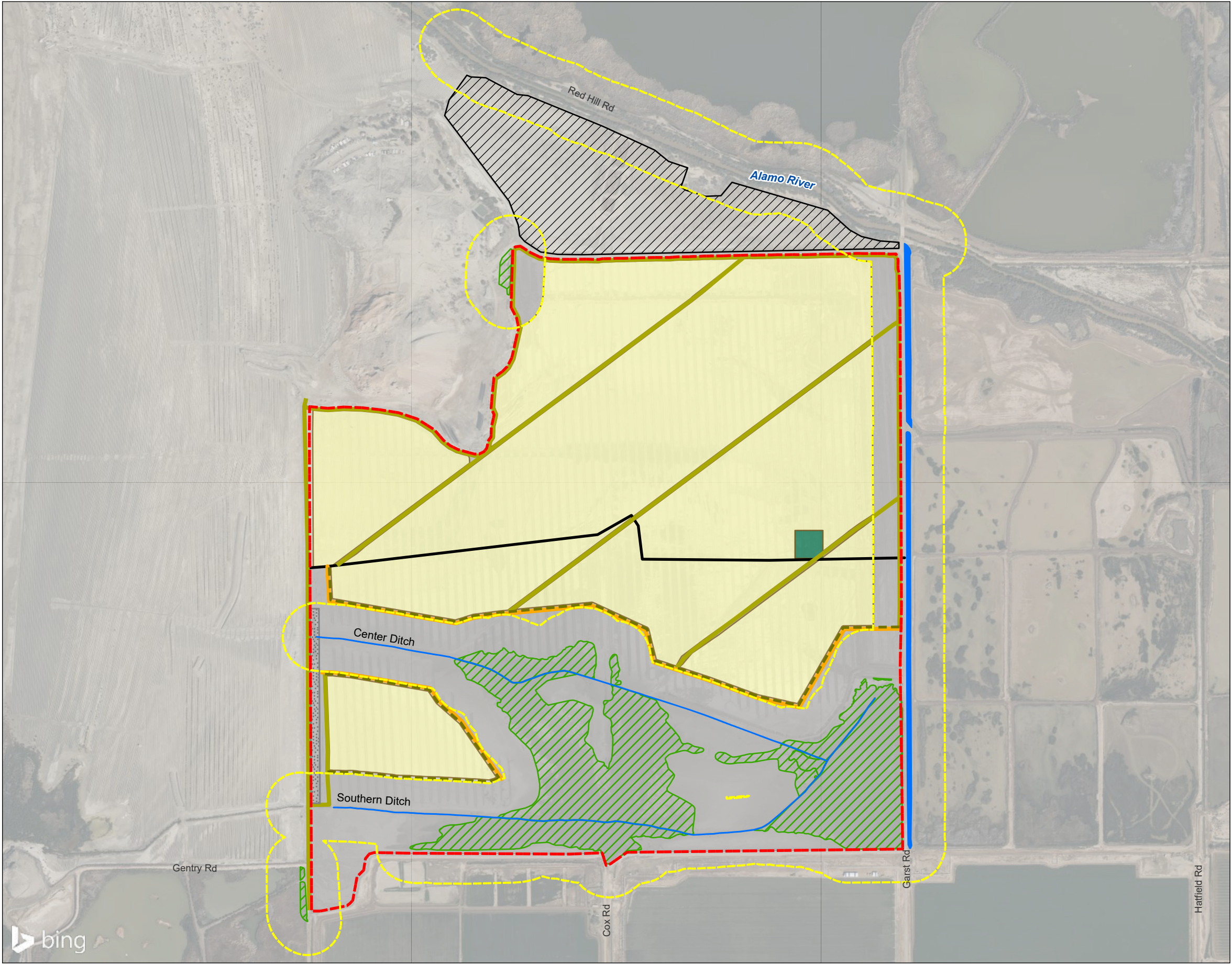
185865263

Imperial Irrigation District
Red Hill Bay BACM Project

Figure No.
1

Title
Project Location

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- Waters/Wetlands 300 ft. Buffer
- Wetlands (CDFW, RWQCB) [2024]
- Former Borrow Area
- Existing Channels to be Maintained

Existing Features

- Access Road
- Access Route

Proposed Features

- Project Area
- Staging Area
- Temporary Resource Protection Berm (Approximate Location)
- In Field Staging Area
- Surface Stabilizer Application Area
- Proposed Access Route

Avoidance Areas

- Resource Avoidance/ Inaccessible Areas



0 900 1,800 Feet
(At original document size of 11x17)
1:10,800

Notes
1. Coordinate System: NAD 1983 StatePlane California VI FIPS 0406 Feet
2. Data Sources: Stantec 2024.
3. Background: California Streams:
World Ocean Base: Esri, GEBCO, Garmin
World Ocean Reference: Esri, GEBCO, NGS
Bing Maps Aerial: © 2026 Microsoft Corporation © 2026 Maxar ©CNES (2026) Distribution
Airbus DS



Project Location
Calipatria
Imperial County, California

Prepared by DL on 2026-02-10
TR by SET on 2026-02-10
IR by SG on 2026-02-10

Client/Project

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Imperial Irrigation District
Red Hill Bay BACM Project

Figure No.

2

Title

Project Components

Section 1 – Project and Agency Information

Figure 3. Example of Temporary Storage Tanks



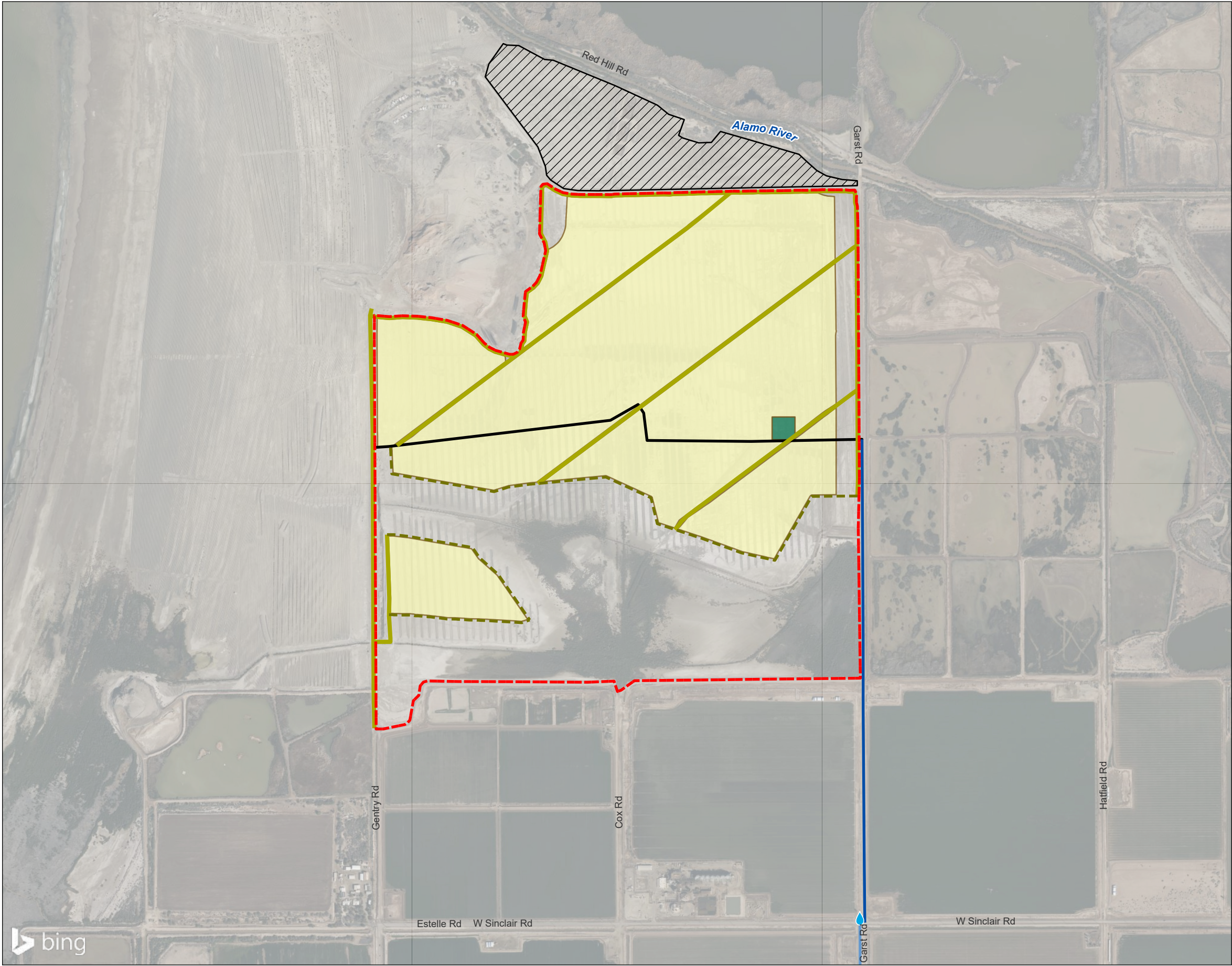
Figure 4. Example of In-Field Water Truck



Figure 5. Example of Hose Reel and Irrigation Boom



Source of Photos: Formation Environmental



Existing Features

- Access Road
- Access Route
- Vail 3 Drain

Proposed Features

- Project Area
- Staging Area
- Water Transport Route
- Surface Stabilizer Application Area
- In Field Staging Area
- Water Source
- Proposed Access Route



0 1,100 2,200 Feet
(At original document size of 11x17)
1:13,200

Notes
1. Coordinate System: NAD 1983 StatePlane California VI FIPS 0406 Feet
2. Data Sources: Stantec 2024.
3. Background: California Streams:
Bing Maps Aerial: © 2026 Microsoft Corporation © 2026 Maxar ©CNES (2026) Distribution
Airbus DS
World Ocean Base: Esri, GEBCO, Garmin, NaturalVue
World Ocean Reference: Esri, GEBCO, Garmin, NGS



Project Location
Calipatria
Imperial County, California
Client/Project
185865263

Imperial Irrigation District
Red Hill Bay BACM Project

Figure No.

6

Title

Construction Travel Route

Section 1 – Project and Agency Information

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Section 2

Environmental Analysis

2.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would result in potentially significant impacts as indicated by the checklist on the following pages. Mitigation measures have been identified to reduce impacts on these factors to less than significant levels.

☐ Aesthetics	☐ Greenhouse Gas Emissions	☐ Population and Housing
☐ Agricultural Resources	☒ Geology and Soils	☐ Public Services
☐ Air Quality	☐ Hazards and Hazardous Materials	☐ Recreation
☒ Biological Resources	☐ Hydrology and Water Quality	☒ Transportation
☒ Cultural Resources, Tribal Resources	☐ Land Use and Planning	☐ Utilities and Service Systems
☐ Energy	☐ Mineral Resources	☐ Wildfire
	☐ Noise	

2.2 AGENCY DETERMINATION

On the basis of this initial evaluation:

- ☐ I find that the project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the 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 applicant. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the 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.
- ☐ I find that although the 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 project, nothing further is required.

Signature: _____

Title: _____

Printed Name: _____

Date: _____

Section 2 – Environmental Analysis

2.3 ENVIRONMENTAL CHECKLIST

2.3.1 Aesthetics

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized 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 a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Discussion: The majority of the Project site consists of undeveloped, dry lakebed with dust control furrows and interconnected access roads. Vegetated areas are located at the south and southeast corner of the site. The site slopes down to the northwest at a low gradient with elevations of approximately 232 to 226 feet below mean sea level (msl) (Formation 2023). The site can be viewed from the surrounding roadways; Garst Road borders the site on the east, Cox Road on the south. The northern staging area is visible from Red Hill Road. Campers at Red Hill Park (northwest of the Project site) have limited views of the site since camping spaces are located on the north (far) side of Red Island Volcano.

- a) and c) **Less than Significant Impact.** Construction activities for the Project include transport of aggregate base to the Project site for preparation of staging areas and roadway improvement, grading of access routes, grading for temporary resource protection berms, truck travel to bring water and soil stabilizer to the site, soil stabilizer dilution, and stabilizer application. Throughout the approximately 16-week soil stabilizer application period, semi-truck trailers or on-road water trucks would be present on the Project site. Views of the Project site during construction could include several vehicles – including grader, semi-tankers to deliver stabilizer product to the site, semi-truck trailer or water truck for application, water trucks for roadway dust suppression, and light duty vehicles. The level of construction activity would alter views of the site but would be temporary and not inconsistent with surrounding agricultural and geothermal operations. The site is not

visible from residences; the closest homes are located in Niland and Calipatria, over 4 miles from the Project site. Within the context of the surrounding land uses and limited number of adjacent viewers, the impact of ground disturbance associated with Project construction would be temporary and less than significant on the visual character of the Project area.

Furrowed soils on the site currently appear white to light grey and darker gray and brown (Figure 7). [Additional site photographs are included in Appendix B - Biological Resources Technical Report (BRTR)]. Once applied and cured, soil stabilizer does not substantially change the color or appearance of soils. No structures are proposed and aside from 1.5-foot-high resource protection berms, no change in elevation of the site would result with application of soil stabilizer. Therefore, views of the Salton Sea from the Project site would not be altered. Application of soil stabilizers would not degrade the visual character of the site. Therefore, the operational impact of the Project on scenic vistas and visual quality would be less than significant.

- b) **No Impact.** Scenic roadways are designated by the Bureau of Land Management (BLM), Caltrans, and the Federal Highway Administration. There are no officially designated scenic highways in the Project vicinity. The closest eligible segments are State Route (SR)-111 from Mecca to Bombay Beach and SR-78 on the west side of the Salton Sea (Caltrans 2018). There are no trees, major landform features or rock outcroppings within the proposed soil stabilizer application area. Vegetated wetlands located in the southern portion of the site would not be disturbed by Project construction. Red Island Volcano is located northwest of the Project site but is not within the area proposed for BACM; this area would not be impacted by the Project. Application of soil stabilizers would not alter the visual quality of the Project site and would not impact views from designated or eligible segments of state scenic highways. The Project would have no impact on scenic roadways.
- d) **Less Than Significant Impact.** The proposed Project does not include permanent installation of new sources of lighting. Construction activities would occur primarily in daylight hours; some limited use of lighting may be necessary in the early morning or evening hours. Use of portable lights during construction, if any, would be localized. Since the proposed lighting would be of limited duration and confined to the specific area of construction, impacts on light and glare that could affect day or nighttime views of the Project area would be less than significant.

Section 2 – Environmental Analysis

Figure 7. View of the Northern Portion of the Project Site Looking South



2.3.2 Agricultural and Forest Resources

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Discussion:

- a) **No Impact.** The Project area does not contain lands mapped by the Farmland Mapping and Monitoring Program (FMMP). Immediately south of the Project parcel, agricultural lands are mapped by the California Department of Conservation (2022a) as:
- Prime Farmland - land with the best combination of physical and chemical characteristics for the production of crops
 - Farmland of Statewide Importance – land with a good combination of physical and chemical characteristics for the production of crops
 - Farmland of Local Importance – Non-irrigated and uncultivated land with Prime and Statewide soil mapping units

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Since no FMMP-designated Farmland is mapped for the site, the Project would have no impact on conversion of FMMP designated Farmland to non-agricultural use.

- b) **No Impact.** Existing zoning by Imperial County on the Project site is S-1-G, A-3-G, A-3-RE, and S-1-RE with land use designations of Recreation/Open Space, Agricultural, and Government/Special Public. The majority of the site is designated as Salton Sea (Imperial County 2025a). The southeast corner of the Project site is zoned for heavy agriculture. This portion of the property has existing wetland vegetation and no dust control is proposed at this location. Overall, no change to the existing open space land use is proposed under the proposed BACM Project. Therefore, the Project would have no impact on agricultural zoning. Since Imperial County is withdrawn from the Williamson Act program (California Department of Conservation 2022b), the proposed Project would have no impact on Williamson Act contracts.
- c) and d) **No Impact.** The Project site is not zoned as forested land and the proposed Project would not result in conversion of forest land to non-forest use. Public Resources Code Section 12220 (g) defines "Forest land" as land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. No trees exist within the BACM area of the Project site, and no tree removal would occur. Therefore, the proposed Project would have no impact on forest lands.
- e) **No Impact.** Runoff from adjacent agricultural lands flows across the Project site through the Central and Southern Ditches. Since the Project is designed to avoid these features, runoff flows from adjacent agriculture through the site would continue with implementation of the Project. No areas currently in agricultural or forest production would be converted as part of the Project. Therefore, construction and operation of the Project would have no impact on agriculture or forestry operations.

2.3.3 Air Quality

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) affecting a substantial number of people?	☐	☐	☒	☐

Discussion: The Project is located within ICAPCD, which includes the southern half of the Salton Sea and Imperial County cities of Brawley, Calexico, El Centro, Niland, and Westmorland. Air quality is impacted by climate and pollution sources in an area. Imperial County is defined by its arid summers and cool, dry winters with the annual temperature in Calipatria ranging from 43 degrees Fahrenheit (°F) to 107°F. The hot season lasts between early June and end of September with the average daily temperature exceeding 99°F. The cool seasons takes place between November and February with an average winter temperature between 44°F and 69°F. Imperial County is an arid climate with the rainy period lasting from December to March with a monthly average rainfall in Calipatria of 0.5 to 0.7 inches. Wind in the area typically comes from the west or north with wind speed ranging from 6.6 mph to 9.2 mph (Weather Spark 2026).

ICAPCD has jurisdiction over the control of air pollution from all sources within the County, excluding mobile sources. Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards for outdoor concentrations. The federal and state standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons such as children, pregnant women, and the elderly, from illness or discomfort. Criteria air pollutants include ozone (O₃), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter 2.5 microns or less in diameter (PM_{2.5}), PM₁₀, and lead (Pb). O₃ is not directly emitted but is a secondary pollutant formed from a chemical reaction between nitrous oxides (NO_x) and volatile organic compounds (VOC). Pursuant to the federal Clean Air Act, the ICAPCD is responsible for reducing emissions of criteria air pollutants for which the area is considered in non-attainment. Imperial County is in nonattainment for federal ozone and PM_{2.5} and maintenance for federal PM₁₀ and nonattainment for state ozone, PM_{2.5}, and PM₁₀ (USEPA 2024 and CARB 2024).

The ICAPCD has prepared the Final 2017 Imperial County 2008 8-Hr Ozone State Implementation Plan (SIP), Final 2013 SIP for the 2006 24-Hour PM_{2.5} Moderate Nonattainment Area, 2018

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Annual Particulate Matter Less than 2.5 Microns in Diameter SIP, and the 2018 Redesignation Request and Maintenance Plan for Particulate Matter less than 10 Microns in Diameter to demonstrate how the County will meet attainment of the federal air quality standards as required under the EPA and Clean Air Act (ICAPCD 2024).

- a) **Less than Significant Impact.** This impact is determined based on whether the proposed Project would conflict with or obstruct implementation of the applicable air quality plan and/or applicable portions of the State Implementation Plan, which would lead to increases in the frequency or severity of existing air quality violations. The Project would apply soil stabilizer across approximately 334 acres of the Project site. The proposed Project would not induce unplanned growth, remove an existing obstacle to growth, or lead to permanent increases in vehicle miles travelled by existing motorists.

Moreover, as described below, the Project would not exceed ICAPCD construction or Tier 1 operational thresholds and would comply with applicable ICAPCD fugitive dust rules (ICAPCD 2017). Air districts set these thresholds in order to determine if an individual project has the potential to increase the potential to generate or worsen an existing air quality impact. Since the Project would not exceed these thresholds and would not induce unplanned population or regional growth, the proposed Project would not conflict with or obstruct implementation of the applicable air quality plans and the impact would be less than significant.

- b) **Less than Significant Impact.** The Project would generate emissions from construction and operation. Emissions were calculated with the California Emissions Estimator Model (CalEEMod).

The site would require 275 gallons of soil stabilizer per acre, resulting in a total of 97,900 gallons imported to the site. The soil stabilizer was assumed to travel to the site in semi-tanker trucks from Casa Grande, Arizona approximately 265 miles away. Up to 20 semi-tanker trips (40 one-way trips) are anticipated. The soil stabilizer would be mixed with water from a temporary suction pump in IID's Vail 3 Drain. Semi-truck trailers or water trucks would be used to transport water from the Vail 3 Drain to the in-field staging area. The semi-trucks or water trucks would travel approximately 1 mile north along Garst Road and require up to 10 trips (20 one-way trips) or 14 trips (28 one-way trips) per day. It was assumed water trucks would be used for this analysis.

Construction of the proposed access routes was assumed to occur during site preparation to prepare for soil stabilization. During site preparation the access road and in-field staging area may be covered with 8 inches of aggregate base. It was assumed that hauling trips would visit the site to deliver all aggregate during this phase. The Project would require approximately 3,680 cubic yards of aggregate. Assuming 16 cubic yard trucks, the Project would require 230 roundtrips total or 21 one-way trips per day. It was assumed that all construction vehicle trips (worker, vendor, and hauling) would travel an average of 1.5 miles on unpaved roadways to the construction staging areas. It was assumed that water

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trucks would distribute the soil stabilizer on-site.² Assuming a range of 3,000 to 6,000 gallons/truck, approximately 200 in-field truck trips would be required to apply the stabilizer. Assuming 2 acres per truck trip and six truck trips per day, up to 30 working days would be anticipated. It was conservatively assumed that water trucks would be heavy heavy-duty trucks and travel onsite 3 miles per day.

The proposed soil stabilizer is Soiltac® which does not contain any volatile organic compounds (Appendix C). Air emissions modeling files are presented in Appendix A.

Once the soil stabilizer is placed, the dust suppressant would be monitored. Monitoring methods would include the following: emission potential with the PI-SWERL, ground-based sand motion sensors (e.g., Cox Sand Catchers and SANTRIs), upwind-downwind PM₁₀ monitoring, plume opacity observations, and visual surveillance (e.g., Roundshot cameras). Employees would be required for plume opacity observations and visual surveillance. However, it is anticipated that one to two employees may be required and visual surveillance would be periodic. Therefore, emissions from employees traveling to the site would be minor.

Reapplication of the stabilizers may occur every 2 to 5 years. Reapplication would be the same process as the initial application of soil stabilizer. Therefore, the reapplication emissions were assumed to be the same as construction for this analysis. As shown in Table 1, the emissions would not exceed construction or operational thresholds.

Table 1. Project Construction and Operational Emissions (lbs/day)

Source	NOx	ROG	SOx	CO	PM ₁₀	PM _{2.5}
Construction/Reapplication of Soil Stabilizer	31	3.3	0.06	30	94	13
Construction Thresholds	100	75	-	550	150	-
Exceed?	No	No	No	No	No	No
Operational Thresholds	137	137	150	550	150	550
Exceed?	No	No	No	No	No	No

Note: Assumes consistency with ICAPCD Regulation VIII, Fugitive Dust Rules

Construction emissions also account for the hauling of aggregate for the roadway and staging area that would not occur during the reapplication of the soil stabilizer. Therefore, the emissions generated during reapplication would be lower than presented in Table 1. Regardless, as shown in Table 1, emissions would not exceed thresholds and therefore the impact would be less than significant.

- c) **Less than Significant Impact.** Land uses surrounding the Project site include agricultural fields, the Salton Sea, a wildlife preserve, and geothermal plants. No sensitive receptors

² The soil stabilizer would be applied to the site either using water trucks (Option 1) or using a hose reel and irrigation boom (Option 2). Option 1 was assumed to produce higher daily emissions due to the amount of truck trips required per day as compared to Option 2. Therefore, the emissions for the water truck application method (Option 1) were calculated and compared to the ICAPCD's daily emission thresholds.

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are located near the Project site or would be exposed to substantial pollutant concentrations. Sensitive receptors may lie near roadways used to transport soil stabilizers and aggregate to the site. However, exposure to toxic air contaminants from heavy duty diesel trucks would be minor as they would travel past the receptor en route to or from the site. Additionally, during construction, the Project would be required to comply with all fugitive dust regulations set by the air district and outlined within the Project description. Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations and impacts would be less than significant.

Implementation of the proposed Project would reliably control dust emissions from the Project site; the long-term impact on air quality would be beneficial.

- d) **Less than Significant Impact.** Land uses typically considered to be associated with odors include wastewater treatment facilities, waste-disposal facilities, or agricultural operations. The Project does not contain land uses typically associated with emitting objectionable odors.

Project construction and operation would result in minor localized odors associated with fuel use for equipment and vehicles. These odors are common, not normally considered offensive, and would not be experienced by any residences since none are located on or immediately adjacent to the Project site. Additionally, emissions would disperse rapidly from the Project site. Therefore, odors from Project construction and operation would be less than significant.

2.3.4 Biological Resources

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐

Discussion: Reconnaissance biological resources surveys were conducted by Stantec Consulting Services Inc. (Stantec) biologists on May 18, 19, and 20, and December 16 and 17, 2021; in addition, aquatic and biological resources surveys were conducted May 18, 19, and 20, 2021 and July 2, 2024. A supplemental survey focused on the presence of burrowing owls at a potential staging area in the northwest portion of the Project area and along the travel route for water trucks to the Vail 3 Drain was conducted on December 15, 2025.

The 2021 and 2024 reconnaissance surveys were conducted within accessible portions of the approximately 660-acre Project site, in addition to a 300-foot buffer zone surrounding the site. This approximately 660-acre Project site (work area and potential staging area) and the 300-foot

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buffer zone are defined as the Biological Study Area (BSA) and include approximately 845 acres. The aquatic resources survey area includes the Project site (approximately 660 acres) and a 100-foot buffer zone (approximately 723 acres). The BRTR is included as Appendix B; the Aquatics Resources Assessment and Preliminary Delineation Report is included as Appendix C of the BRTR. A brief summary of the findings is provided below.

Vegetation - A list of vegetation communities and acreages in the BSA are included in Table 2 with mapping provided in Appendix B. The vast majority of the Project site is disturbed playa with limited habitat value.

Table 2. Vegetation Communities and Land Cover Types

Vegetation Communities/Land Cover Types	Project Site (acres)	BSA (acres)
Vegetation Communities		
Cattail Marsh	--	22.90
Giant Reed and Tamarisk Thickets	--	19.86
Iodine Bush Scrub	47.59	48.84
Tamarisk Thickets	33.97	35.97
Land Cover Types		
Disturbed/Developed	6.02	78.59
Disturbed Playa	568.99	612.08
Rock Outcrop	--	1.92
Row and Field Agriculture	--	10.46
Borrow Pit	1.70	1.70
Excavated Channel	1.35	1.43
Vegetated Channel	--	0.51
Non-Vegetated Channel	--	6.00
Riverine	--	3.98
Open Water	--	0.29
Total	659.62	844.53

Invertebrates - The reconnaissance-level survey of the BSA detected a variety of common and non-native invertebrates. Some of the orders identified included beetles (*Coleoptera* spp.), flies (*Diptera* spp.), grasshoppers (*Orthoptera* spp.), crickets (*Gryllidae* spp.), isopods (*Isopoda* spp.), snails (*Gastropoda* spp.), spiders (*Araneae* spp.), moths and butterflies (*Lepidoptera* spp.), bees (*Apis* spp.), and ants (*Hymenoptera* spp.).

Fish - Desert pupfish have been known to be found in waters in the surrounding area (USFWS 2014) and were observed in the Southern Ditch during the May 2021 surveys. Nonnative fish, such as tilapia (*Tilapia* sp.), longjaw mudsucker (*Gillichthys mirabilis*), mosquitofish (*Gambusia affinis*), and sailfin molly (*Poecilia latipinna*) also have potential to be found within the Project site. During the July 2024 survey, black molly (*Poecilia sphenops*) and sailfin molly were observed in the Southern Ditch.

Amphibians - Amphibians require aquatic habitats for all or part of their life cycle, which is present within the BSA; however, no amphibians were observed during the 2021, 2024 or 2025 surveys. Although these species were not detected, suitable habitat conditions for common amphibians were

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observed within the BSA, including western spadefoot (*Spea hammondi*), arroyo toad (*Anaxyrus californicus*), and western toad (*Anaxyrus boreas*).

Reptiles - Many reptile species, even if present, are difficult to detect because they are cryptic and their life history characteristics (e.g., foraging, thermoregulatory behavior, fossorial nature, camouflage, etc.) limit their ability to be observed during most surveys. Suitable habitat conditions for common reptiles were observed within the BSA, including common side-blotched lizard (*Uta stansburiana*), western fence lizard (*Sceloporus occidentalis*), gopher snake (*Pituophis catenifer*), and western whiptail (*Aspidoscelis tigris*).

Birds - Birds were identified by sight and sound and were observed throughout the BSA. Most bird species were observed within wetland areas in the southwestern and eastern portions of the BSA. Flyovers by turkey vulture (*Cathartes aura*) and American kestrel (*Falco sparverius*) were noted. A group of cliff swallows (*Petrochelidon pyrrhonota*) were observed and likely nesting under the bridge at the Alamo River in the northern portion of the BSA. Seven special-status bird species were observed within and adjacent to the BSA during the May 2021 surveys, including burrowing owl (*Athene cunicularia*), Caspian tern (*Hydroprogne caspia*), gull-billed tern (*Gelochelidon nilotica*), white-faced ibis (*Plegadis chihi*), black-tailed gnatcatcher (*Polioptila melanura*), black skimmer (*Rynchops niger*), and yellow warbler (*Setophaga petechia*). Black-necked stilts (*Himantopus mexicanus*) were observed nesting in surface water in the northern portion of the BSA. Additional bird species use the BSA at different periods, either as year-round residents, wintering habitat, seasonal breeding, or as occasional migrants. Common bird species include mallard (*Anas platyrhynchos*), Cooper's hawk (*Accipiter cooperii*), and greater roadrunner (*Geococcyx californianus*).

Mammals - Multiple desert cottontails (*Sylvilagus audubonii*) and a coyote (*Canis latrans*) were observed during the May 2021 surveys. Signs of other mammal species (tracks, scat, etc.) were detected, but no live individuals (other than noted above) were observed during the 2021 and 2024 surveys. Other common mammals are expected to occur within the BSA given the habitat conditions and species that are known to occur in the region.

- a) **Less Than Significant Impact with Mitigation Incorporated.** Sensitive species are known for the Project site and surrounding vicinity.

Records Searches. Known occurrences of special-status species within the Project site and surrounding area were identified by conducting a focused literature review. The Project site is located within the USGS Niland, California, 7.5-minute topographic quadrangle. A search of the CDFW California Natural Diversity Database (CNDDB) was conducted for the BSA and a surrounding 10-mile buffer area to determine special-status plants, wildlife, and vegetation communities that have been documented within this area (CDFW 2024a). The database included portions of the following quadrangles surrounding the BSA:

- Frink
- Wister
- Obsidian Butte

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- Calipatria SW
- Iris Wash
- Iris
- West
- Westmorland

Additional data regarding the potential occurrence of special-status species and policies relating to these special-status natural resources were gathered from the following sources:

- State and Federally Listed Endangered and Threatened Animals of California (CDFW 2024b)
- Special Animals List (CDFW 2024c)
- State and Federally Listed Endangered, Threatened, and Rare Plants of California (CDFW 2024d)
- California Sensitive Natural Communities (CDFW 2024e)
- Inventory of Rare and Endangered Vascular Plants of California (California Native Plant Society [CNPS] 2024)
- Consortium of California Herbaria (CCH) (CCH 2024)
- IID Habitat Conservation Plan Planning Agreement (IID, CDFG, USFWS 2006)

Based on the database searches, other research, and pedestrian surveys of the Project site, Tables 5 and 6 of Appendix B summarize the sensitive species with potential to occur at the Project site.

Special Status Plants. The potential for special-status plant species to occur is based on proximity to previously recorded occurrences, onsite vegetation and habitat quality, topography, elevation, soils, surrounding land uses, habitat preferences, and geographic ranges. No special-status plants were observed within the BSA during the 2021, 2024, or 2025 surveys. Three special-status plants are known to occur in the region surrounding the Project site (within 10 miles): Harwood's milk-vetch (*Astragalus insularis* var. *harwoodii*), gravel milk-vetch (*Astragalus sabulonum*), and mud nama (*Nama stenocarpa*). All three plants are California Rare Plant Rank 2B.2 - plants presumed extinct in California but more common elsewhere; plants fairly threatened in California (moderate degree/immediacy of threat). These plants are not state or federally listed as Threatened or Endangered. Based on the existing levels of ground disturbance at the site the potential for these species to be present in areas that would be disturbed by construction or operation is considered low. During preconstruction surveys for the Project (Mitigation Measure BIO-2), biologists will note if sensitive plants are present within the area for Project disturbance and make recommendations for avoidance or relocation, as applicable. With implementation of mitigation, impacts on sensitive plant species would be less than significant.

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Special Status Wildlife. Each of the wildlife taxa identified in the record searches was assessed for their potential to occur within the BSA based on the following criteria:

- **Present:** Taxa (or sign) were observed in the BSA or in the same watershed (aquatic taxa only) during the most recent surveys, or a population has been acknowledged by CDFW, USFWS, or local experts.
- **High:** Habitat (including soils) for the taxa occurs on site and a known occurrence occurs within the BSA or adjacent areas (within 5 miles of the BSA) within the past 20 years; however, these taxa were not detected during the most recent surveys.
- **Moderate:** Habitat (including soils) for the taxa occurs on site and a known regional record occurs within the database search, but not within 5 miles of the BSA or within the past 20 years; or a known occurrence occurs within 5 miles of the BSA and within the past 20 years and marginal or limited amounts of habitat occur on site; or the taxa's range includes the geographic area and suitable habitat exists.
- **Low:** Limited habitat for the taxa occurs on site and no known occurrences were found within the database search and the taxa's range includes the geographic area.
- **Not Likely to Occur:** The environmental conditions associated with taxa presence do not occur within the BSA.

Special status wildlife species are known for the Project vicinity and were observed during surveys of the Project site. Table 3 summarizes species with Low, Moderate, or High potential to be present on the Project site, and species that were observed during site surveys. [Animal species known for the Project region but considered Not Likely to Occur are described in Appendix B.]

Table 3. Special Status Wildlife with the Potential to be Impacted by the Project

Species	Common Name	Status	Potential to Occur on Project Site	Impact Assessment and Mitigation Measures
Federally or State Listed, or Candidate Species				
<i>Cyprinodon macularius</i>	desert pupfish	FE, SE	Present in Southern Ditch	Project construction would not occur within 300 feet of existing ditches on the Project site; drainage from off-site agriculture to the ditches would not be impacted by the Project. No impacts to fish species would occur. Mitigation measures BIO-1 and BIO-5 would further reduce impacts.

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Species	Common Name	Status	Potential to Occur on Project Site	Impact Assessment and Mitigation Measures
<i>Athene cunicularia</i>	burrowing owl	S2, SSC, SC, BCC	Present (see Figure 3 of Appendix B)	Disturbance to individuals or burrows during Project construction would be potentially significant. Mitigation measure BIO-2 and BIO-4 would ensure survey for owls and burrows prior to construction and monitoring during construction. As mitigated, impacts on burrowing owl would be less than significant.
<i>Rallus obsoletus yumanensis</i>	Yuma Ridgway's rail	FE, ST, FP	High (nesting and foraging)	Disturbance to nesting sensitive birds during Project construction would be potentially significant. However, Project construction would not occur within 300 feet of existing vegetated wetlands on the Project site, reducing the potential for impacts to sensitive bird species. Since ample foraging habitat is present in adjacent areas, impacts on foraging would be less than significant. Mitigation measures BIO-2 and BIO-3 would include survey for individuals and nests, monitoring, and avoidance as warranted. As mitigated, impacts on sensitive bird species would be less than significant.
<i>Empidonax traillii extimus</i>	southwestern willow flycatcher	FE, SE, S3	Moderate (nesting and foraging)	
<i>Laterallus jamaicensis coturniculus</i>	California black rail	ST, FP	Low (foraging and nesting)	
<i>Melanerpes uropygialis</i>	Gila woodpecker	SE, BCC	High (foraging) Moderate (nesting)	
<i>Danaus plexippus</i>	Monarch butterfly	FC	Present	Preferred food plants and/or roosting habitat are not present on the Project site and the potential for the Project to impact other nectar producing flowering plants is limited; this species is known to use the adjacent Sonny Bono Salton Sea National Wildlife Refuge as a stopover point during migration and the Project site observation was likely a transient moving through. Mitigation measure BIO-2 would include site survey prior to construction to confirm the absence of suitable plants for foraging. As mitigated, impacts on Monarch butterfly would be less than significant.

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Species	Common Name	Status	Potential to Occur on Project Site	Impact Assessment and Mitigation Measures
Species of Special Concern				
<i>Phrynosoma mcallii</i>	flat-tailed horned lizard	S3, SSC	Low	Project construction would not occur within 300 feet of existing vegetated wetlands on the Project site, therefore the likelihood of impacts to flat-tailed horned lizard would be reduced. Mitigation measure BIO-2 would include preconstruction survey in suitable habitat for this species, and avoidance or relocation, as applicable. As mitigated, impacts to flat-tailed horned lizard would be less than significant.
<i>Asio flammeus</i>	short-eared owl	S2, SSC	Moderate (foraging) Not Likely to Occur (nesting)	Impacts to nesting special-status birds during Project construction would be potentially significant. However, Project construction would not occur within 300 feet of existing vegetated wetlands on the Project site reducing the potential for impacts to sensitive bird species. Since ample foraging habitat is present in adjacent areas, impacts on foraging would be less than significant. Mitigation measures BIO-2 and BIO-3 would include surveys for individuals and nests, monitoring, and avoidance as warranted. As mitigated, impacts on sensitive bird species would be less than significant.
<i>Charadrius montanus</i>	mountain plover	S2, SSC, BCC	High (nesting and foraging)	
<i>Charadrius nivosus nivosus</i>	western snowy plover	FT, S3, SSC	High (foraging) Moderate (nesting)	
<i>Falco columbarius</i>	merlin	S3S4 WL	Moderate (foraging) Low (nesting)	
<i>Gelochelidon nilotica</i>	gull-billed tern	S1, SSC, BCC	Present	
<i>Hydroprogne caspia</i>	Caspian tern	S4	Present	
<i>Icteria virens</i>	yellow-breasted chat	S4, SSC	Moderate (foraging) Moderate (nesting)	
<i>Larus californicus</i>	California gull	S4, WL, BCC	High (foraging and nesting)	
<i>Pelecanus occidentalis californicus</i>	California brown pelican	S3, Delist	Moderate (foraging) Not Likely to Occur (nesting)	
<i>Plegadis chihi</i>	white-faced ibis	S3S4, WL	Present (fly-over) High (foraging and nesting)	

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Species	Common Name	Status	Potential to Occur on Project Site	Impact Assessment and Mitigation Measures
<i>Poliophtila melanura</i>	black-tailed gnatcatcher	S3S4, WL	High (foraging) Moderate (nesting)	
<i>Rynchops niger</i>	black skimmer	S2, SSC, BCC	Present	
<i>Setophaga petechia</i>	yellow warbler	S3, SSC	Present	
<i>Toxostoma crissale</i>	Crissal thrasher	S2, SSC	Moderate (foraging) Moderate (nesting)	
<i>Toxostoma lecontei</i>	Le Conte's thrasher	S3, SSC, BCC	High (nesting and foraging)	
<i>Nyctinomops femorosaccus</i>	pocketed free-tailed bat	S3, SSC	Low	Project construction would not occur within 300 feet of existing vegetated wetlands or ditches on the Project site. Therefore, impacts on bat foraging would be less than significant. Roosting in areas to be disturbed by the Project would be unlikely.

Federal Rankings:

FE = Federally Endangered
 FT = Federally Threatened
 FC = Federal Candidate for Listing
 BCC = USFWS Bird of Conservation Concern
 Delist. = removed from federal listing

State Rankings:

FP = Fully Protected
 SE= State Endangered
 ST = State Threatened
 SA = CDFW Special Animal
 SC = State Candidate for Listing
 WL = CDFW Watch List
 SSC = Species of Special Concern
 Delist. = removed from state listing
 SX = Presumed Extirpated
 SH = Possibly Extirpated
 S1 = Critically Imperiled
 S2 = Imperiled
 S3 = Vulnerable
 S4 = Apparently Secure
 S5 = Secure

Burrowing Owl. Burrowing owl are known to occur adjacent to the Project site (see Figure 3 of Appendix B). Since this species is known to occur in the area, a supplemental survey was conducted in December 2025 to survey a potential staging area in the northwest portion of the site and the travel route for water trucks to the Vail 3 Drain. Due to the presence of burrowing owl at the potential northwest staging area site, this element was removed from the Project description. During the 2025 surveys, the southwest portion of the site identified for soil stabilizer application (isolated polygon west of existing wetlands) was also surveyed. The entire polygon was barren of wildlife and vegetation. The Southern Ditch south of the polygon was inundated with water and

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supported insects and songbirds. No burrows or burrowing owls were observed within the polygon. Due to the lack of vegetation and absence of small mammal burrows for nesting or insects/lizards for foraging, burrowing owls are unlikely to nest or forage within the polygon or other areas of open playa. However, they may forage within and around the Southern Ditch. The low-growing vegetation between Southern Ditch and the southern access road would allow burrowing owls to forage across this area.

Summary of Impacts to Sensitive Wildlife Species. The Project site is potential habitat for several sensitive species, primarily avian species, and Project construction could impact individuals or nests. The Migratory Bird Treaty Act (MBTA) and Sections 3503, 3503.5, and 3513 of the Fish and Game Code (FGC) protect the nests of essentially all bird species (native and non-native), including common species. Therefore, mitigation measures have been identified to educate construction workers regarding biological resources issues (BIO-1), survey and monitor for sensitive species (BIO-2), survey for avian nests (BIO-3), conduct focused surveys for burrowing owls (BIO-4), and minimize pollutant inputs to onsite aquatic resources (BIO-5). Additionally, the Project is designed to limit impacts to onsite vegetated wetlands and ditches by maintenance of a 300 ft buffer area and creation of resource protection berms. As designed and with implementation of mitigation measures BIO-1 through BIO-5, impacts on sensitive wildlife would be less than significant.

The Project includes the use of a synthetic vinyl copolymer soil stabilizer. Applied to the ground surface, these compounds create a non-emissive water-resistant crust. Per the manufacturer (Soilworks), Soiltac® is biodegradable and safe for humans, animals and vegetation. The United States Army Corps of Engineers (USACE) Engineer Research and Development Center conducted a study of six commercially available dust stabilizer products, including Soiltac®. The study concluded that vinyl acetate and acrylic polymer emulsifiers are stable in soils after curing and are unlikely to be available to terrestrial organisms or transported in runoff water (Steevens et al. 2007). Mammalian data were noted to be limited but the study concluded that Soiltac® appears to be relatively nontoxic to the environment (Steevens et al. 2007).

Stabilizers such as Soiltac® that are insoluble once cured may be transported in runoff water through the transport of product sorbed to soil and sediment particles. Therefore, to be conservative, soil stabilizers would not be applied directly or within 300 feet of onsite vegetated wetlands and ditches or offsite agricultural drains. The proposed resource protection containment berms north and west of the wetlands and drains would further protect inadvertent application to wetlands, or runoff of soil particles treated with stabilizer from entering onsite wetlands or waterways. Therefore, impacts to biological resources from soil stabilizer use would be less than significant.

Designated Critical Habitat. The Project site does not occur within Designated Critical Habitat for any species. The closest Designated Critical Habitat (for the Peirson's milk-vetch and the desert pupfish) is approximately 15 miles southwest of the site. Therefore, Project construction and operation would have no impacts on Designated Critical Habitat.

- b) **Less Than Significant Impact.** Of the vegetation communities observed within the BSA, Cattail Marsh and Iodine Bush Scrub have been designated as sensitive natural communities by the CDFW with state rarity ranking of S5 and S3.2, respectively. However,

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there is no Cattail Marsh found within the Project site. A small area of Iodine Bush Scrub is located on the Project parcel but outside the BACM area at the northwest corner of the Project site (Appendix B). Larger areas of Iodine Bush Scrub are located in the southern portion of the Project site adjacent to the tamarisk thickets along the Southern Ditch. Since installation of BACM is not proposed for these areas or within 300 feet of existing wetlands, direct impacts to this sensitive vegetation community are not anticipated. Implementation of standard construction BMPs and mitigation measure BIO-5 would further protect areas of Iodine Bush Scrub. Project-related impacts on sensitive vegetation communities would be less than significant.

- c) **Less Than Significant Impact with Mitigation Incorporated.** The USFWS National Wetlands Inventory (NWI) has mapped a variety of wetland and riparian resources within the BSA associated with the Salton Sea, its floodplain, and associated tributaries. The features mapped within the BSA reflect 2012 conditions and include lake, freshwater forested/shrub wetland, freshwater pond, freshwater emergent wetland, and riverine features (USFWS 2024). To update these data, pedestrian surveys of aquatic features were conducted in 2021 and 2024.

Drainages and Other Waters. Aquatic features in the Study Area are:

- **Aquatic Resource 1 (Center Ditch)** - Aquatic Resource 1 (Center Ditch) is an excavated channel (ditch) with variable width (approximately 4 feet wide on average) that traverses mostly barren playa habitat near the center of the Project site. The ditch passes through sections of Iodine Bush Scrub and Tamarisk Thicket. The ditch has a natural bottom substrate and carries agricultural runoff intermittently. The Center Ditch is potentially under the jurisdiction of the RWQCB and CDFW because of the presence of a bed and banks and intermittent flow. However, the Center Ditch is not under USACE jurisdiction as a water of the United States (WOTUS) because it is an excavated ditch that carries agricultural runoff, it does not have a clear ordinary high water mark (OHWM), and it is intermittent in nature; therefore, the features of this resource do not meet the current definition of a WOTUS.
- **Aquatic Resource 2 (Southern Ditch)** - Aquatic Resource 2 (Southern Ditch) is an excavated channel (ditch) with variable width (approximately 5 feet wide on average) that passes through the two wetland areas in the southern portion of the Project site, including Iodine Bush Scrub and Tamarisk Thicket. The ditch has a natural bottom substrate, an OHWM, and carries agricultural runoff. Eastern sections of Aquatic Resource 2 (Southern Ditch) and areas within the wetlands were flowing during aquatic surveys in May 2021 and July 2024; however, the western sections of the Southern Ditch are intermittent (western section of the ditch was dry during the July 2, 2024, survey). Aquatic Resource 2 (Southern Ditch) is potentially under the jurisdiction of the RWQCB and CDFW because of the presence of a bed and banks and intermittent flow. However, Aquatic Resource 2 (Southern Ditch) is not under USACE jurisdiction as a WOTUS because it is an excavated ditch that carries agricultural runoff and is intermittent in nature; therefore, it does not meet the current definition of a WOTUS. Additionally, an Approved Jurisdictional Determination was submitted to the USACE

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for review in 2020 that included this resource; the USACE determined that Aquatic Resource 2 did not meet the requirements to be a WOTUS.

- **Aquatic Resource 3 & 4** - There are two short excavated ephemeral ditches, noted as Aquatic Resources 3 and 4, located along the eastern boundary of the Survey Area which are isolated and run east/west. These short, isolated ditches are potentially under the jurisdiction of the RWQCB and CDFW as waters of the State because of the presence of a bed and banks and intermittent flow. These features are not under USACE jurisdiction because these features are excavated, are ephemeral, do not connect to a WOTUS, and thus they do not meet the current definition of a WOTUS.
- **Aquatic Resource 5** - The borrow pits, noted as Aquatic Resource 5, are intermittently filled with rainwater but do not have a direct connection to WOTUS or waters of the State. The borrow pits do not fit the criteria for wetlands or waters of the State and thus are not under the jurisdiction of USACE, RWQCB, or CDFW.
- **Aquatic Resource 6** - This resource is an excavated ditch that runs parallel to Garst Road that carries agricultural runoff to wetland areas east of Garst Road. This agricultural ditch is potentially under the jurisdiction of the RWQCB and CDFW as waters of the State because of the presence of a bed and banks and intermittent flow. This feature is not under USACE jurisdiction because it is an excavated ditch that carries agricultural runoff, it is ephemeral, does not connect to a WOTUS; therefore, it does not meet the current definition of a WOTUS. This ditch is located outside of the Project site.
- **Aquatic Resource 7 (Alamo River)** – Aquatic Resource 7 (Alamo River) is located along the northern portion of the Survey Area; however, it does not fall within the Project site. Aquatic Resource 7 (Alamo River) is a perennial stream that originates in Mexico and flows north into the Salton Sea. The Aquatic Resource 7 (Alamo River) contains agricultural return flows from Imperial Valley and carries treated wastewater from point sources in Imperial Valley (RWQCB 2024). The portion of the Aquatic Resource 7 (Alamo River) within the Survey Area has steep vegetated banks. The vegetation along the banks includes Giant Reed and Tamarisk Thicket. Aquatic Resource 7 (Alamo River) is potentially under the jurisdiction of the USACE, RWQCB, and CDFW because it has a bed and bank, an OHWM, is perennial, and connects to a WOTUS (the Salton Sea).

Wetlands. The two vegetated areas in the southern portion of the Survey Area and the vegetated area in the northern portion of the Survey Area delineated as wetlands in 2020 (Palustrine Scrub Shrub Wetland [PSSW-1, PSSW-2, and PSSW-3 in ECORP 2020]) were confirmed to have maintained their indicative CDFW and RWQCB wetland features, but are no longer considered USACE wetland due to lack of association with a known WOTUS. These areas qualify as wetlands under the jurisdiction of the CDFW and RWQCB. Additionally, there is a cattail marsh at the southwestern corner of the Survey Area that qualifies as jurisdictional under CDFW and RWQCB; however, this area does not fall within the Project site. The acreage and jurisdiction of wetlands and other waters on the Project site are summarized in Table 4 with mapping provided in Appendix B.

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Table 4. Wetlands and Waters within the Project Site

Feature	Agency	Acreage
Wetlands	CDFW, RWQCB	81.55
Non-Wetland Waters	CDFW and RWQCB	1.35
Total		82.90

All mapped drainages within the Survey Area, except Aquatic Resource 5 (borrow pits), fall under potential RWQCB and CDFW jurisdiction as waters of the State due to the clear evidence of bed, bank, and in some instances, presence of an OHWM. Under the new Amendment to the 2023 WOTUS Rule, any ephemeral or non-perennial aquatic resources no longer fall under federal (USACE) jurisdiction. Because of its perennial nature and its eventual connection to the Salton Sea, Aquatic Resource 7 (Alamo River) is expected to fall under jurisdiction of the USACE. All mapped wetlands within the Survey Area also fall under potential RWQCB and CDFW jurisdiction.

The Project is designed with a 300 ft buffer from the existing ditches and wetland areas and construction of resource protection berms. No construction activity or application of soil stabilizers would occur with the buffer, therefore no direct impacts to wetlands and non-wetland waters would occur. Standard construction BMPs and mitigation measure BIO-5 would be implemented to further protect the onsite wetlands and non-wetland waters from runoff and water quality impacts. As mitigated, Project-related impacts on wetlands would be less than significant.

- d) **Less Than Significant Impact.** The BSA contains a large open space with non-native vegetation (tamarisk and giant reed), disturbed playa, the Alamo River, cattail marshes, and other wetlands. The southwestern portions of the BSA are adjacent to the Sonny Bono Salton Sea National Wildlife Refuge. The Refuge contains medium quality habitat suitable for a variety of species; however, there are conditions and infrastructure that would generally constrain the movement of wildlife within the region and, by extension, through the site. The area surrounding the BSA is characterized by cattail freshwater wetlands, agricultural fields, a man-made channel, and man-made development and infrastructure, including barriers to terrestrial wildlife movement such as buildings, fencing, and roadways. With application of soil stabilizer the Project site would remain open space. Since impacts to drainages would be avoided, the Project would have no impacts to fish migration or nursery sites in the existing onsite drainages. Overall, Project-related impacts on wildlife corridors and nursery sites would be less than significant.
- e) **Less Than Significant Impact with Mitigation Incorporated.** The Imperial County Code of Ordinances has established two codes related to biological resources (Chapter 12.44, Wildlife Protection, and Chapter 12.48 Wild Flowers and Trees). The Conservation and Open Space Element of the Imperial County General Plan has established one goal and two policies related to biological resources. The County's two codes, one goal and two supporting policies provide protection to wildlife, wildflowers and trees as well as preservation of native plant communities and best restoration practices.

The Project site would remain as open space and mitigation measures would be implemented to protect sensitive plant and animal species. As mitigated, and with

avoidance of on-site vegetated wetlands, the Project would not conflict with these goals. The impact on local policies or ordinances protecting biological resources would be less than significant with mitigation incorporated.

- f) **Less Than Significant Impact.** The Imperial Valley Natural Community Conservation Plan (NCCP) and Habitat Conservation Plan (HCP) Planning Agreement Number 2810-2004-001-06 was executed on February 1, 2006, by IID, CDFW, and USFWS. This NCCP/HCP is still in process and has not been finalized. This NCCP/HCP was created to provide protection and conservation of local biological diversity including sensitive species, common species, natural communities, and ecological processes and to continue the growth and development of human activities in the area. This NCCP/HCP covers approximately 500,000 acres within Imperial County (including the Project site) and a small portion of Riverside County. The area includes the rights-of-way along the All-American Canal from the Imperial Dam on the Colorado River to Calexico and the IID service area from the United States and Mexico border to the Salton Sea, which includes the rights-of-way along the canals (IID, CDFG, USFWS 2006).

Within the NCCP/HCP planning area, there are specific species that are protected (or may be protected in the future) under the California Endangered Species Act (CESA) and/or the Federal Endangered Species Act (FESA). Wetlands are also protected by this NCCP/HCP. Since the proposed Project would avoid impacts to the on-site vegetated wetlands and mitigation measures would be implemented to protect sensitive species (BIO-1 through BIO-5), the Project would be consistent with applicable habitat conservation plans and impacts would be less than significant.

Mitigation Measures

Implementation of the following mitigation measures would reduce impacts on biological resources to less than significant levels.

BIO-1 Worker Environmental Awareness Program. Prior to the start of construction activities, a Worker Environmental Awareness Program (WEAP) shall be prepared and implemented by a qualified biologist. The WEAP shall be finalized and administered prior to construction mobilization, and implemented throughout the duration of the construction activities, such as when new contractor employees or subcontractors begin working on site. A log of all personnel who have completed the WEAP training shall be kept on site. The WEAP, at a minimum, shall cover:

- Federal and State Endangered Species Acts, Bald and Golden Eagle Protection Act, and the Migratory Bird Treaty Act, and consequences of non-compliance with these acts
- Identification and values of plant and wildlife species and significant natural plant community habitats
- Hazardous substance spill prevention and containment measures
- A contact person and phone number in the event wildlife needs to be relocated or dead or injured wildlife is discovered

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- Review of mitigation measures adopted as part of the Mitigated Negative Declaration
- Literature and photographs or illustrations of potentially occurring special-status plant and/or wildlife species shall be provided to construction contractor staff
- Maps showing the known locations of special-status wildlife, populations of rare plants and sensitive vegetative communities, seasonal depressions and known waterbodies, wetland habitat, exclusion areas, and other construction limitations (e.g. limited operating periods, etc.).

BIO-2 Biological Monitoring and Plant and Wildlife Preconstruction Clearance Surveys

Biological Monitoring - Prior to the commencement of ground disturbance or site mobilization activities IID shall retain a qualified biologist(s), for the duration of Project construction, with demonstrated expertise with listed and/or special-status plants, terrestrial mammals, and reptiles to monitor construction activities. The qualified biologist(s) shall be present at all times during initial ground-disturbing activities (assumed to be the first week of construction). After initial ground disturbing activities, the qualified biologist(s) shall be on site a minimum of once a week for the duration of construction. Regardless of the initial ground disturbance timeframe, the qualified biologist shall also be on-site when work is immediately adjacent to, or within, habitat that supports populations of the listed or special-status species identified within the Project boundaries. Any listed or special- status plants shall be flagged for avoidance.

If sensitive wildlife species are detected, individuals shall be protected or allowed to move away on their own (non-invasive, passive relocation) to adjacent appropriate habitat (at least 200 feet from the construction limits). Any special-status terrestrial species found within a Project impact area, that do not move away on their own, shall be relocated by the authorized biologist and relocated to suitable habitat outside the impact area; some species may require additional permitting and may not be able to be relocated immediately. Where active relocation is required, special status wildlife shall be captured by a qualified biologist with proper handling permits. The qualified biologist shall prepare a species-specific list (or plan) of proper handling and relocation protocols. The list (or plan) of protocols shall be implemented during construction. The qualified biologist may consult with CDFW/USFWS to prepare species-specific protocols for proper handling and relocation procedures. Only a USFWS approved biologist shall be authorized to capture and relocate Federal ESA-listed species. A relocation plan shall be prepared prior to implementing Project-related ground disturbing activities. If the installation of exclusion fencing is deemed necessary by the authorized biologist, the authorized biologist shall direct the installation of the fence. Clearance surveys for special-status species shall be conducted by the authorized biologist prior to the initiation of construction each day the biologist is on-site.

If, during construction, the biological monitor observes a dead or injured listed or special-status wildlife species on the Project site, a written report shall be sent to CDFW and/or USFWS within five calendar days. The report will include the date, time of the finding or incident (if known), and location of the carcass and circumstances of its death (if known). The biological monitor shall, immediately upon finding the remains, coordinate with the onsite construction foreman to discuss the events that caused the mortality, in known, and implement measures to prevent future incidents. Details of these measures shall be included with the report. Species remains shall be collected and

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frozen as soon as possible, and CDFW and/or USFWS shall be contacted regarding ultimate disposal of the remains. Work in the immediate area may resume once the proper notifications have been made and mitigation measures have been identified to prevent additional injury or death.

Common wildlife found within the Project site or in areas potentially affected by the proposed Project shall be relocated to the nearest suitable habitat that would not be affected by the proposed Project prior to the start of construction.

Pre-Construction Surveys - Prior to ground disturbance or vegetation clearing within the proposed Project site, a qualified biologist(s) shall conduct preconstruction plant surveys and wildlife clearance surveys (no more than 7 days prior to site disturbing activities) where suitable habitat is present and will be directly impacted by construction activities.

Plants. If a rare plant species is found, it will be fenced and avoided. If it cannot be avoided, then an appropriate relocation strategy shall be developed and coordinated with CDFW and/or USFWS.

Animals. Preconstruction surveys for common and special-status wildlife shall be conducted. If sensitive wildlife species are detected, the qualified biologist shall use visible flagging to mark the location where the sensitive wildlife species was detected. The qualified biologist shall take a photo of each location, map each location, and provide the specific species detected at that location. The qualified biologist shall provide a summary report of sensitive wildlife species surveys to IID before any Project-related ground-disturbing construction activities. CDFW shall be notified and consulted regarding the presence of any special-status wildlife species found on site during surveys prior to ground-disturbing construction activities. If a FESA-listed species is found prior to or during construction, the USFWS shall also be notified.

BIO-3 Nesting Bird Survey. The Project site shall be surveyed for nesting birds if construction activities occur between February 15th to September 15th (January 1st – July 31st for raptors). If the nesting season cannot be avoided, nesting bird surveys shall be conducted as follows (if construction extends into multiple nesting seasons, surveys shall be done annually until construction is complete):

- Prior to site disturbance (i.e., mobilization, staging, grading or construction) IID shall retain a qualified biologist to conduct pre-construction surveys for nesting birds within the recognized breeding season in all areas within 500 feet of Project construction areas. The required survey dates may be modified based on local conditions, as determined by the qualified biologist, with the approval of IID, in consultation with USFWS and/or CDFW.
- If breeding birds with active nests are found prior to or during construction, a biological monitor shall establish a minimum 300-foot buffer around the nest for ground-based construction activities and no activities will be allowed within the buffer(s) until the young have fledged from the nest or the nest fails.
- The prescribed buffers may be adjusted to reflect existing conditions including ambient noise, topography, and disturbance with the approval of the qualified biologist. The qualified biologist/biological monitor(s) shall conduct regular monitoring of the nest to determine success/failure and to ensure that Project activities are not conducted within the

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buffer(s) until the nesting cycle is complete or the nest fails. The qualified biologist/biological monitor(s) shall be responsible for documenting the results of the surveys and ongoing monitoring and will provide a copy of the monitoring reports for impact areas to the respective agencies.

- If for any reason a bird nest must be removed during the nesting season, IID shall provide written documentation providing concurrence from the USFWS and CDFW authorizing the nest relocation. Additionally, IID shall provide a written report documenting the relocation efforts. The report shall include what actions were taken to avoid moving the nest, the location of the nest, what species is being relocated, the number and condition of the eggs taken from the nest, the location of where the eggs are incubated, the survival rate, the location of the nests where the chicks are relocated, and whether the birds were accepted by the adopted parent.
- If birds are found to be nesting in construction equipment, that equipment shall not be used until the young have fledged the nest or, if no young are present, until after the breeding season has passed.

BIO-4 Burrowing Owl Surveys. Two pre-construction surveys shall be conducted for burrowing owls. The first survey shall be conducted during peak activity period (one hour before and two hours after sunrise or two hours before to one hour after sunset) between 14 and 30 days prior to the start of construction. The second survey shall be performed within the 24-hour period prior to ground disturbance. CDFW approval shall be obtained for the biologist(s) prior to performing the surveys. The impact area and a 500-foot buffer (where practicable) shall be surveyed. If owls are located during the surveys, a buffer area shall be established according to the guidelines included in the March 7, 2012 DFG Staff Report on Burrowing Owl Mitigation (Staff Report) if located between February 1 and August 31 (nesting season). A modified buffer reduction may be used with CDFW concurrence. If located outside of this time period (i.e., the non-breeding season), owls may be passively relocated by a qualified biologist according to the procedures outlined in the Staff Report or a modified buffer reduction may be used with CDFW concurrence; relocation may require obtaining an incidental take permit for the species as it is a candidate for listing under CESA. If burrowing owls are found on site, survey results shall be submitted to CDFW at least 5 days prior to commencing Project activities.

BIO-5 Pollution Protection Measures. During Project construction and maintenance, runoff of water containing mud, silt, or other pollutants shall be prevented from entering onsite ditches. No equipment maintenance shall be conducted within 300 feet of any aquatic resource. Spoil sites shall not be located within 300 feet of any aquatic resource and spoil washing back into an aquatic resource during storm flows shall be prevented.

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2.3.5 Cultural Resources

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Discussion: A Phase I archaeological investigation for the Project was conducted by Stantec on behalf of IID (2026). The purpose of the archaeological study was to document potential historical resources in the Project area, evaluate the resources, if any, for inclusion in the National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR), and assess the Project’s potential to result in a substantial adverse change to the significance of an historical resource pursuant to Title 14 CCR §15064.5. A general summary of the results with limited information is provided below. To protect archaeological resources present in the Project vicinity, the cultural resources report is on file with Stantec but is not appended to the Initial Study. The confidentiality of records and information pertaining to the location, character, or ownership of archaeological sites and historic properties will be maintained consistent with National Historic Preservation Act (NHPA) Section 304, Archeological Resources Protection Act (ARPA) Section 9, and California Government Code 6254.10, as applicable.

Ethnographic Overview. The Project Area is situated in the shared ancestral region of the Kumeyaay and the Cahuilla. The Kumeyaay, also known as the Tipai-Ipai or Diegueño, were a Yuman speaking Hokan tribe that historically inhabited the southern region of present-day San Diego County, western and central Imperial County, and northern Baja California (Almstedt 1982; Gifford 1931; Hedges 1975; Luomala 1976; Shipek 1982; Spier 1923). The Kumeyaay had a number of major permanent villages and seasonal camps where community members would follow the harvest seasons of certain plants (Hoffman and Gamble 2006). Kumeyaay villages were located near water sources and the material culture included pottery for cooking and storage, baskets, projectile points, flaked lithic and ground stone tools, bows and arrows, arrow shaft straighteners, and stone, bone, and shell ornaments (Hoffman and Gamble 2006). The Kumeyaay had many trails and trade routes between groups, including the present-day routes of Interstate 8 and Highway 101 (Hoffman and Gamble 2006).

The Cahuilla are speakers of the Takic branch of Uto-Aztecan, or Shoshonean language group, which also includes the Serrano, Luiseño, Gabrielino and Chemehuevi (Bean 1972). The Cahuilla occupied the inland basin between the San Bernardino Range to the east and the Palomar Mountains to the west (Kroeber 1925). Village locations maximized a number of resources including the climate, water, and food and were often established at the lower end of alluvial fans

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where sufficiently high-water tables enabled the Cahuilla to dig wells and be near large mesquite groves. Subsistence of the Cahuilla was mostly oriented towards hunting and seed and nut gathering. The Cahuilla had an extensive trade system with neighboring tribes. Food, shells, and animal and mineral products were traded with the coastal groups and with other inland tribes (Bean 1972). The oasis at Dos Palmas served as a major stopping place for Native Americans traveling along the Coco-Maricopa trail connecting the Colorado River and major villages located in the Imperial and Coachella Valley (von Werlhof 1980).

Pre-Contact. The Salton Sea is located in what was the lower reach of ancient Lake Cahuilla. The freshwater lake supported a large population of Native Americans in the region that is now the Coachella and Imperial Valleys. Numerous archaeological sites have been recorded on the old lakeshore, which is about 250 to 300 feet above the present-day level of the Salton Sea. These archaeological sites include the remains of habitation and work sites such as fishing and hunting sites. Pre-contact archaeology of the area is evaluated based on the chronology presented by Warren (1980) and Schaefer and Laylander (2010) which provides a temporal framework for the area by designating adaptations and physical and environmental changes into the following time periods: Pinto Period (7400 to 4000 before present (BP)); Gypsum Period (4000 to 1500 BP); Saratoga Springs Period (1500 to 800 BP); and Protohistoric Period (800 to Historic Contact).

Post-Contact. European contact with Native American groups in California began in the 1500s, when Spanish explorers such as Juan Cabrillo and Francis Drake explored the California coast. In the late 1700s the Spanish established a continuous presence in California. California missions were the center of the Spanish influence in the region and had a catastrophic impact on native cultures and population in the region as thousands succumbed to European disease. In the early 1800s, the Spanish began to establish outposts east of the coastal Missions spreading their sphere of influence to inland portions of southern California. In many ways this forced the native inhabitants to modify their traditional lifeways, primarily due to forced restrictions of their territorial areas, beliefs, and practices (e.g., Castillo 1978; Heizer 1974).

The Kumeyaay were first encountered by the Spanish during the 1775 expedition of Juan Bautista de Anza and Father Hermengildo and later by Francisco Garces in 1781 (Imperial County 1993). In 1848 Gold Rush immigrants passed through the Imperial Valley along the Southern Immigrant Trail. Numerous confrontations between 1848 and 1849 led to the establishment of the military fortification of Fort Yuma in southeastern Imperial County (Imperial County 1993).

Southern California's population grew quickly with the advent of the transcontinental line of the Southern Pacific Railroad in 1869. The opening of the Alamo Canal in 1901 brought the first irrigation water to the Imperial Valley and resulted in a boom of agricultural development within Imperial County (Imperial County 1993). Initially, the transcontinental line was located along the north end of Imperial Valley and a branch line was built from Niland in 1903 permitting increased commercial export of agricultural products (Imperial County 1993). In 1905, a levee break caused disastrous flooding of the Colorado River into the Imperial Valley for approximately 18 months. This flooding created the body of water that is the Salton Sea. Due to this disaster, major irrigation improvements were made, and settlement and agriculture once again continued to grow. The town of Calipatria, located just southeast of the Salton Sea, was a large producer of barley and was established in 1914 by the Imperial Valley Farm Lands Association. Agriculture remains the prominent industry within the area today.

Records Searches. The investigation consisted of an archival records search of the entire 584-acre Project Area and a surrounding 0.5-mile Study Area. To identify known cultural resources and previous cultural resource studies, a California Historical Resources Information System archival records search was conducted by the South Coastal Information Center (SCIC) at San Diego State University on January 13, 2022. The SCIC records search included a review of all previously recorded precontact and historic archaeological sites within the Study Area, as well as a review of all known cultural resource survey reports, excavation reports, and regional cultural overviews.

Additionally, as part of the records search the following sources were reviewed:

- Google Earth Imagery
- Historical Aerial Imagery (1953 – 2022)
- *Calipatria, CA*, (1944) 1:62,500, USGS 15-minute topographic quadrangle map
- *Calipatria, CA*, (1976) 1:50,000 USGS topographic quadrangle map
- *Salton Sea, CA*, (1954; 1959; 1965), 1:250,000 USGS topographic quadrangle map
- *Salton Sea, CA*, (1985), 1:100,000 USGS topographic quadrangle map
- *Niland, CA*, (1956; 1992; 2012; 2018), 1:24,000 USGS 7.5-minute topographic quadrangle map

The record search identified 12 reports documenting previous cultural studies within the Project Area and three previous studies conducted within the Study Area. The records search identified no cultural resources in the Project Area. The records search identified four cultural resources in the Study Area consisting of one single-family residence constructed in 1951 and three natural features.

Pedestrian Survey. A pedestrian survey of surveyable portions of an approximately 137-acre corridor within and adjacent to the Project Area was led by Stantec Field Director Joseph Cusack on March 23, 2022. The survey was conducted by walking parallel transects, spaced approximately 20 meters apart along a 4.5-mile corridor within and adjacent to the Project Area. Dense vegetation and wetlands are noted within and/or adjacent to the 137-acre corridor. The pedestrian survey focused on the western portion of the Project Area, which has higher archaeological sensitivity (i.e., this location is along a former lake shoreline, near a prehistoric obsidian quarry outside of the Project Area, and a former salt flat area). Approximately 60 acres of land within the current Project Area were surveyed. Additionally, approximately 77 acres were surveyed outside of the current Project Area. This additional acreage was reviewed for a previous version of the Project no longer under consideration. The central and eastern portion of the Project Area was not surveyed as it had been submerged prior to 1992, includes modifications consistent with man-made wetlands, and shows evidence of ongoing mechanical disturbances (i.e., relocation of soil via grading and trench furrowing). Stantec examined surface and subsurface exposures such as rodent burrows, furrowed trenches, and cut banks for physical manifestations of human activity greater than 45 years in age.

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No cultural resources (sites of prehistoric or historic type, features, or artifacts) were observed during the intensive pedestrian survey.

- a) **No Impact.** The records search identified no cultural resources in the Project Area. The records search identified four cultural resources in the Study Area, however, adjacent sites would not be impacted by Project construction or operation, and the resources would not be demolished, relocated, or materially impaired. Therefore, the Project would have no impact on historical resources.
- b) **Less than Significant Impact with Mitigation Incorporated.** Since no archaeological resources were observed during the survey the Project would not cause a substantial adverse change to the significance of cultural resources as defined in the CEQA Guidelines (14 CCR Section 15064.5). Additionally, based on the previous disturbance for dust control in the Project area, the potential to encounter significant resources is considered low. However, earthwork would be required for development of on-site access roadways, therefore, there is some limited potential to disturb previously unknown cultural resources. Implementation of mitigation measures CUL-1 and CUL-2 would reduce impacts on cultural resources to less than significant levels.
- c) **Less than Significant Impact with Mitigation Incorporated.** No recorded cemeteries are known for the Project area. In the unexpected event that human remains are discovered during project construction or operation, the County Coroner shall be contacted, the area of the find would be protected, and provisions of State CEQA Guidelines Section 15064.5 and Public Resources Code 5097 would be followed. With implementation of mitigation measure CUL-1 and CUL-3, Project-related impacts on human remains and associated funerary objects potentially present in the Project area would be less than significant.

Mitigation Measures

- **CUL-1 Cultural Resources Awareness Training.** All field supervisors and all construction workers shall participate in training on cultural resources awareness prior to the initiation of Project construction on Project sites that involve ground-disturbing activities. The training shall include a description of the types of cultural resources (including tribal cultural resources and human remains) that could inadvertently be encountered during ground-disturbing activities, the sensitivity of the resources, the legal basis for protection of the resources, and the penalties for unauthorized collection of or knowingly damaging the resources. The training shall address the proper procedures in the event of an inadvertent discovery of a cultural resource, including the immediate halting of work in the area of the discovery, notification of appropriate individuals of the discovery, the establishment of appropriate protective buffer zones around the discovery, and the continued avoidance of the protected area until the resource has been evaluated by qualified individuals and an appropriate treatment plan has been developed and implemented. The training program shall document monitoring procedures (including potential Tribal monitors) for inadvertent discovery of cultural resources, notification procedures, key staff, and preliminary treatment measures for potential discoveries in the event of inadvertent discovery of cultural resources. The training presentation shall be available to additional supervisory or construction personnel who may join after Project construction has begun.

- **CUL-2 Unanticipated Discoveries.** In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed 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, evaluates the significance of the find and determines whether or not additional study is warranted. Should it be required, temporary flagging may be installed around a resource to avoid any disturbances from construction equipment. Depending upon the significance of the find under CEQA (14 California Code of Regulations Section 15064.5(f); California Public Resources Code Section 21082), the archaeologist may record the find to appropriate standards (thereby addressing any data potential) and allow work to continue. If the archaeologist observes the discovery to be potentially significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery, may be warranted. Work in the area may resume once evaluation and treatment of the resource is completed or the resource is recovered and removed from the site.
- **CUL-3 Unanticipated Human Remains.** In the event that human remains are inadvertently encountered during ground disturbing activities, they would be treated consistent with state and local regulations including California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and the California Code of Regulations Section 15064.5(e). In accordance with these regulations, if human remains are found, the County Coroner must be immediately notified of the discovery. No further excavation or disturbance of the Project area or any nearby (no less than 100 feet) area reasonably suspected to overlie adjacent remains can occur until the County Coroner has determined if the remains are potentially human in origin. If the County Coroner determines that the remains are, or are believed to be, Native American, they are required to notify the Native American Heritage Commission (NAHC) that shall then notify those persons believed to be the most likely descendant. The most likely descendant shall determine, in consultation with the property owner, the disposition of the human remains.

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2.3.6 Energy

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

a) **Less Than Significant Impact.** Construction would require fuels for heavy equipment, electric power, and fuel for personal vehicles over approximately 16 weeks. Energy would be used for Project monitoring and maintenance, for similar vehicle and equipment types. However, application of soil stabilizers would have a low energy demand for operations (infrequent maintenance only). Therefore, the use of fuels for the purpose of dust control on the Red Hill Bay site would not be wasteful. Impacts on energy use would be less than significant.

b) **No Impact.** The Imperial County General Plan Conservation and Open Space Element (2016) includes:

- Objective 8.2: Focus all new renewable energy development within adopted Renewable Energy Overlay Zones.
- Objective 9.2: Encourage renewable energy developments that include Salton Sea restoration components.

The Renewable Energy and Transmission Element (2015a) includes:

- Objective 4.1: Prioritize the Salton Sea exposed seabed (playa) for renewable energy development.
- Objective 4.2: Encourage the development of renewable energy facilities that will contribute to the reduction or elimination of airborne pollutants created by exposure of the seabed of the Salton Sea as it recedes.

The Draft Lithium Valley Specific Plan (Imperial County 2025b) includes:

- Objective 1: Develop geothermal energy facilities and lithium extraction facilities to support the country's transition to renewable energy and minimize national security threats.

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The proposed Project is the installation and operation of dust control on the Red Hill Bay site. The Project does not include development of renewable energy on the site, however, IID does have a geothermal lessee. Construction and operation of BACM on the Project site would not prevent development of renewable energy on the site, and site and vehicular access for the lessee would continue to be facilitated. The proposed dust control Project would therefore be consistent with existing Imperial County objectives for development of renewable energy.

Construction and operation of the Project would require the consumption of fossil fuels and electric power. Overall, the Project would not use energy in a wasteful manner and would be consistent with Imperial County policies for renewable energy. The Project would have no impact on energy planning.

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2.3.7 Geology and Soils

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Expose people or structures to 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.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994) creating substantial risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems, where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Discussion: A geotechnical investigation of the Project site was conducted by Construction Testing & Engineering, Inc. (CTE 2023). A summary of findings from CTE's report is provided below.

The Project is located within the Colorado Desert physiographic province of California and is characterized by a low-lying barren desert basin comprised predominately of alluvial fans, dunes, delta plains, and lakebed deposits. Known as the Salton Trough, the region is an active tectonic pull-apart basin or graben that lies within the Imperial, Riverside, and San Diego counties of southeastern California and extends south of the Mexico - United States border into the state of Baja California. Dominated by the Salton Sea, elevations average 245 feet below msl. The province is a depressed block between active branches of alluvium-covered San Andreas Fault

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with the southern extension of the Mojave Desert on the east. It is characterized by the ancient beach lines and silt deposits of extinct Lake Cahuilla (CTE 2023).

- a)-i) and a)-ii) **Less Than Significant Impact.** Geologic hazards at the site are primarily limited to those related to shaking from earthquake-generated ground motions (CTE 2023). Alquist-Priolo earthquake zones are mapped in the Project vicinity but not on the Project site (California Department of Conservation 2024). Therefore, the potential for surface rupture from displacement or fault movement beneath the proposed dust control is generally considered to be low. According to USGS Quaternary Fault mapping, the nearest known Class A fault (highest potential to generate earthquakes and/or surface rupture) is an inferred segment of the Brawley Seismic Zone (<150 years) located approximately 1.25 miles west of the site. This segment meets the San Andreas Fault Zone approximately 11.7 miles to the northwest. The Hot Springs, Hidden Spring, Lone Tree, East Elmore Ranch, West Elmore Ranch and Kane Springs faults are other known faults in the general Project vicinity. Potential significant ground shaking from activity on the Brawley Fault Zone or other regional faults could occur on the site. Additionally, surface rupture on local faults is also possible outside of the currently mapped active traces of these faults. However, since habitable structures would not be built as part of the proposed Project, people would not be exposed to adverse effects involving seismic ground shaking. Damage to Project facilities (travel routes, resource protection berms) would be repaired as necessary. Overall, impacts related to seismic hazards would be less than significant.
- a)-iii **Less Than Significant Impact.** Based on the very loose to loose and very soft to medium stiff condition of the underlying sand, silt, and clay soils, the potential for seismic settlement beneath the subject site is considered to be moderate to high during a significant seismic event (CTE 2023). Liquefaction induced settlement may be anticipated due to variations in depth of groundwater across the site. The results of a 2021/2022 monitoring program indicate depths to groundwater at 6 to 7 feet below ground surface (bgs) in the southwest corner of the site, 7 to 8 feet bgs in the northeast corner and, 4.5-7 feet bgs in the southeast corner of the site (Formation 2023). Recent measurements of groundwater level trends just west of the Project area indicate groundwater is approximately 12 feet below the ground surface (IID 2025). However, habitable structures would not be built as part of the proposed Project, and people would not be exposed to adverse effects involving seismic-related ground failure, including liquefaction. Damage to Project facilities (roads, berms) would be repaired as necessary. Impacts related to seismic-related ground failure would be less than significant.
- a)-iv **No Impact.** According to mapping by California Geological Survey (CGS) California Landslide Inventory (2019) and by the U.S. Landslide Inventory USGS Landslide Hazard Program (2019), no landslides are mapped in the Project area. The geotechnical study for the Project (CET 2023) determined that landsliding is not considered to be a significant geologic hazard at the site. Additionally, since habitable structures would not be built as part of the proposed Project, people would not be exposed to adverse effects involving landslides. Therefore, the Project would have no impact related to exposure of people or structures to landslides.

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- b) **Less Than Significant Impact.** Construction activities include site preparation (development of the in-field staging area and improvement of the exiting access road), collapsing existing surface roughening in select areas, resource protection berm creation, access route grading, and application of soil stabilizers. Earthwork required for construction has the potential to temporarily increase soil erosion from the disturbed areas. However, since construction methods would include BMPs identified in a SWPPP completed in compliance with the NPDES General Permit for Storm Water Discharges Associated with Construction Activity (General Permit), wind and water erosion of soils during construction would be minimized. Also, the Project area has low relief reducing the likelihood of erosion. The impact of Project construction and maintenance would be less than significant. Project operation would stabilize onsite soils reducing erosion. Therefore, the Project would have a beneficial impact during Project operation by reducing soil erosion.
- c) and d) **Less Than Significant Impact.** Aggregate base for the in-field staging area and existing access road would be installed on soils that are considered unstable. Based on site conditions and results of laboratory consolidation testing, the upper portion of the lake deposits may be potentially compressible and may be marginally susceptible to hydro-collapse where exposed to increased moisture content (CTE 2023). Based on geologic observation and laboratory testing of site soils, the near-surface materials generally are anticipated to exhibit a medium to high expansion potential (Expansion Index 51 to 130). Recommendations for berm and roadway construction have been described by Construction Testing and Engineering, Inc. to minimize the adverse effects of expansive soils. Additionally, since habitable structures would not be built as part of the proposed Project, impacts related to unstable soils (including expansive soils) would be less than significant.
- e) **No Impact.** Sanitation facilities are not present or proposed for the Project site. Therefore, there would be no impact on soils related to wastewater disposal.
- f) **Less than Significant Impact with Mitigation Incorporated.** A review of geologic mapping indicates the Project area is underlain by Holocene- to Pleistocene-aged Lake Cahuilla Beds (Morton 1977). A review of the scientific literature and records from the Natural History Museum of Los Angeles County (NHMLA) and San Diego Natural History Museum (SDNHM) was conducted to collect data on the lithology and paleontological potential of this unit.

Deposits from the ancient Lake Cahuilla Beds occur between the Chocolate and Santa Rosa Mountains, with its paleo-shoreline demarcated by travertine deposits on rock faces along the base of the Santa Rosa Mountains (Norris and Webb 1990). Lake Cahuilla formed intermittently several times during the late Pleistocene and Holocene as a result of avulsion along the Colorado River, with the ancient highstand shoreline approximately 30 to 40 feet above sea level on average (Rockwell et al. 2022). Evidence of former lake levels is visible as remnant beaches, sand spits, and bay-mouth bars along the base of the Santa Rosa Mountains (Norris and Webb 1990). The Lake Cahuilla Beds record a series of fluvial and lacustrine deposits, which formed by changes in the flow path of the Colorado River (Deméré 2002). These deposits comprise a thick sequence of tannish-gray, soft clays, silts,

sands, and gravels that are rich in fossils (Morton 1977). The fluvial sediments were deposited during intervening lake low stands, and are generally composed of gray brown, thinly bedded, poorly sorted, fine-grained sandstone, while lacustrine sediments comprise mudstone that is generally massive and poorly sorted silt and sand and commonly bioturbated (Whistler et al. 1995).

A review of the scientific literature indicates the Lake Cahuilla Beds have yielded fossils of freshwater mollusks, ostracods, fish, and vertebrates, providing paleoclimatic and paleoecological information (Jefferson 2006; Stearns 1901; Hubbs and Miller 1948). Additionally, fossils of a variety of terrestrial animals are recorded from Lake Cahuilla sediments, including lizards, snakes, birds, and small mammals such as mice and squirrels (Roeder and Calvano 2014; Whistler et al. 1995).

The NHMLA (2022) indicated they have records of invertebrates, including the freshwater snail *Physa heterostropha*, from Lake Cahuilla Beds from the vicinity of the Salton Sea. One locality is from Bat Cave Buttes, located approximately 20 miles north-northwest of the Project area and seven are from Bombay Beach, approximately 15 miles north-northwest of the Project area, both along the modern Salton Sea shoreline. One additional Cahuilla Beds locality is recorded from the Salton Sea, with no more specific geographic data available. At the northern end of the ancient Lake Cahuilla, approximately 45 miles northwest from the Project area, the NHMLA (2022) has records of five fossil localities that yielded a diverse assemblage of small animal fossils, including snakes, lizards, birds, fish, rodents, and rabbit from lacustrine claystone of the Cahuilla Beds. The SDNHM (2022) did not report any localities from within 1-mile of the Project area.

Due to the documentation of a diverse vertebrate and invertebrate fauna and the importance of these fossils for their contributions to the understanding of the climate and environment of the late Pleistocene, the Lake Cahuilla Beds have high paleontological sensitivity, using SVP (2010) guidelines.

Ground disturbance of 3 feet in depth or more would have the potential to significantly impact paleontological resources, should they be encountered and damaged or destroyed. At this time, it is estimated that construction activity would impact soils less than 3 feet deep; the possibility of adverse impacts to paleontological resources from these activities is low. However, if conditions change and the Project would impact soils 3 feet deep or more, mitigation measure GEO-1 would be implemented. Mitigation measures GEO-2 and GEO-3 have also been defined to reduce potentially significant impacts on paleontological resources to less than significant levels.

Operations and maintenance for the Project would include monitoring and application of additional soil stabilizer. As these activities are not anticipated to include ground disturbance in previously undisturbed areas, the possibility of adverse impacts to paleontological resources from these activities is low.

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Mitigation Measures

Implementation of the following mitigation measures would reduce impacts on paleontological resources to less than significant levels.

GEO–1 Paleontological Monitoring Program. Mitigation measure GEO-1 shall be implemented if Project construction activities would impact soils 3 feet deep or greater. A paleontologist meeting professional standards as defined by Murphey et al. (2019) shall be retained as the Project Paleontologist to oversee a paleontological mitigation program, including paleontological monitoring of earthwork and ground disturbing activities into undisturbed geologic units with high paleontological potential.

The paleontological monitoring program shall include development of a Paleontological Resources Monitoring and Mitigation Plan that outlines where and when monitoring is necessary, fulltime paleontological monitoring of ground disturbance into the Lake Cahuilla Beds, a discovery plan in the event that fossils are encountered, and final reporting.

GEO-2 Worker Environmental Awareness Program. The Project Paleontologist shall develop a Worker Environmental Awareness Program training that communicates requirements and procedures in the event of a paleontological resources discovery during construction, to be delivered by the Project Paleontologist or their designated representative to the construction crew prior to the onset of ground disturbance.

GEO–3 Inadvertent Discoveries. In the event that paleontological resources are encountered during construction activities, work must stop in a safe radius of the find, typically 50 feet, while the paleontological monitor documents the find. The Project Paleontologist shall assess the find. Should the Project Paleontologist assess the find as significant, the find shall be collected and curated in an accredited repository along with all necessary associated data and curation fees.

2.3.8 Greenhouse Gas Emissions

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Discussion: Greenhouse gases (GHG) absorb and emit radiation within the thermal infrared range. When radiation from the sun reaches the Earth's surface, some of it is reflected back into the atmosphere as infrared radiation (heat). GHGs absorb this infrared radiation and trap the heat in the atmosphere. Over time, the amount of energy from the sun to the Earth's surface should be approximately equal to the amount of energy radiated back into space, leaving the temperature of the earth's surface roughly constant. GHGs, which are transparent to solar radiation, are effective in absorbing infrared radiation. This phenomenon is known as the greenhouse effect.

Among the prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFC), perfluorocarbons (PFC), nitrogen trifluoride (NF₃) and sulfur hexafluoride (SF₆). Each GHG differs in its ability to absorb heat in the atmosphere based on the lifetime, or persistence, of the gas molecule in the atmosphere. Often, estimates of GHG emissions are presented in carbon dioxide equivalents (CO₂e), which weigh each gas by its global warming potential (GWP).

GHG emissions are predominantly associated with activities related to energy production; changes in land use, such as deforestation and land clearing; industrial sources; agricultural activities; transportation; waste and wastewater generation; and commercial and residential land uses. Worldwide, energy production, including the burning of coal, natural gas, and oil for electricity and heat, is the largest single source of global GHG emissions.

- a) **Less than Significant Impact.** The Project would generate GHG emissions from construction and reapplication of soil stabilizers. Emissions were calculated with CalEEMod. Modeling details are provided in Section 3.1, Air Quality.

Construction emissions would be generated from off-road equipment, hauling trips, vendor trips, worker trips, and onsite trips from water trucks. Project construction would include site preparation to add aggregate to the in-field staging area and existing access road and prepare the site for soil stabilization. Additionally, construction would include the initial phase of soil stabilization. The GHG emissions generated during construction are presented in Table 5. ICAPCD does not have construction GHG emissions thresholds. Therefore, consistent with recommendations from the South Coast Air Quality Management District

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(SCAQMD), construction emissions were amortized over a 30-year period (SCAQMD 2008).

Table 5. Project Construction GHG Emissions

Source	MT CO ₂ e
Construction	108
Amortized Construction Emissions	3.6

Once the soil stabilizer is placed, the dust suppressant would be monitored. Monitoring methods would include the following: emission potential with the PI-SWERL, ground-based sand motion sensors (e.g., Cox Sand Catchers and SANTRIs), upwind-downwind PM₁₀ monitoring, plume opacity observations, and visual surveillance (e.g., Roundshot cameras). Employees would be required for plume opacity observations and visual surveillance. However, it is anticipated that one to two employees may be required and visual surveillance would be periodic. Therefore, emissions from employees traveling to the site would be minor.

Reapplication of the soil stabilizer would occur every 2 to 5 years. Reapplication would be the same process as the initial application of soil stabilizer. Emissions in Table 6 represent application of the stabilizers, constructing berms, and improving the staging area and access road. Therefore, reapplication of the stabilizers alone would result in less annual GHG emissions than from the original application. Regardless, annual construction emissions were assumed to be similar to the reapplication process and therefore were compared to SCAQMD thresholds to determine the impact during operation.

Table 6. Project Annual Operational GHG Emissions

Source	MT CO ₂ e
Soil Reapplication	108
Amortized Construction Emissions	3.6
Total	112
SCAQMD Thresholds	3,000
Exceed?	No

ICAPCD does not have GHG thresholds for construction or operation. Therefore, SCAQMD's interim operational GHG threshold of 3,000 MT CO₂e per year for residential and commercial land use projects was used to determine significance (SCAQMD 2008). The SCAQMD proposes that if a project generates GHG emissions below 3,000 metric tons of MT CO₂e, it could be concluded that the project's GHG contribution is not cumulatively considerable and is, therefore, considered less than significant under CEQA. If the project generates GHG emissions above the threshold, the analysis must identify mitigation measures to reduce GHG emissions. As shown in Table 6, the Project's emissions fall below SCAQMD's threshold and, as a result, impacts are less than significant.

- b) **Less than Significant Impact.** The California Air Resources Board (CARB) prepares scoping plans every 5 years pursuant to Assembly Bill (AB) 32. The purpose of the scoping plans are to generate a blueprint for the state to meet GHG reduction goals set forth in AB 32, Senate Bill (SB) 32, and AB 1279. The latest CARB Scoping Plan was released in 2022 with the goal of guiding the state to carbon neutrality by 2045 (CARB 2022). As a dust control project that would generate only minor operational impacts from monitoring and maintenance activities, the Project would not interfere with the goals of the 2022 Scoping Plan.

At this time, there are no other applicable local plans or mandatory GHG policies that would apply with the Project. Therefore, impacts on GHG planning are considered less than significant.

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2.3.9 Hazards and Hazardous Materials

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site 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?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Discussion: No storage of hazardous materials currently occurs at the Project site. Aside from fuels for vehicle use, hazardous materials are not currently used on the Project site.

- a) and b) **Less Than Significant Impact.** Construction of the proposed Project would require the routine transport, use, and storage of limited quantities of gasoline and diesel fuel, and potentially degreasers and solvents for construction vehicle maintenance. An in-field staging area and a previously disturbed area north of the BACM area would be used for vehicle and equipment staging (Figure 2). The in-field staging area would be graded level and covered with Class II aggregate base.

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Fuel trucks will be used onsite as needed for water trucks and heavy equipment; light utility trucks would not be fueled on site. IID implements standard BMPs for equipment and re-fueling, including:

- All equipment and vehicles are routinely inspected for oil and fuel discharges. Spill response supplies would be present in the staging area and if adsorbents are needed, they would be promptly removed after use.
- Equipment re-fueling nozzles have automatic shut-off to prevent dripping and overfilling.
- Construction ingress and egress locations will have racks or shaker plates placed to ensure that sediment clinging to vehicles is not tracked out.
- Vehicle and equipment parking, storage, and maintenance will be performed at designated staging areas. In the event refueling and maintenance at the site is needed, containment BMPs are used to prevent leaks from entering the soil.

The Project would apply Soiltac®, a synthetic copolymer soil stabilizer. The Safety Data Sheet for Soiltac® (Appendix C) provides information on the hazards, composition, first-aid measures, accidental release measures, handling and storage, exposure controls, physical and chemical properties, stability and reactivity, and toxicological, ecological, disposal, transportation, and regulatory information. As shown in the Safety Data Sheet, Soiltac® does not contain hazardous ingredients and is not considered hazardous according to Occupational Safety and Health Administration criteria. Components ≥ 0.1 percent are not known to be associated with carcinogenic effects. Based on EPA guidelines, Soiltac® is classified as practically non-toxic to all species. When used and applied properly, this material is not known to pose any ecological problems. Dioxins and furans, metals, polychlorinated biphenyls aroclors, polycyclic aromatic hydrocarbons, semi-volatile organic compounds, and volatile organic compounds were not detected in Soiltac®.

Soiltac® was approved for use by San Luis Obispo County Air Pollution Control District in 2009 (SLO County APCD CEQA Air Quality Handbook). The product has been used in San Diego County on landfill sites (PCR Services Corporation 2009) and on roads in Chula Vista (US Customs and Border Patrol 2020).

With adherence to the standard procedures for fuel use and vehicle maintenance, impacts related to release or accidental exposure to humans or the environment from hazardous materials would be less than significant.

- c) **Less Than Significant Impact.** There are no schools within $\frac{1}{4}$ mile of the Project site. The closest schools are located in Niland and Calipatria over 4 miles from the Project site. Additionally, hazardous materials use would be limited to fuels for construction vehicles. Since these materials would be properly handled (as described above), the impact on schools from hazardous materials would be less than significant.
- d) **No Impact.** Section 65962.5 of the California Government Code requires the California Environmental Protection Agency (CalEPA) to update a list of known hazardous materials

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sites, which is also called the “Cortese List.” The sites on the Cortese List are designated by the State Water Resources Control Board (SWRCB), the Integrated Waste Management Board, and the Department of Toxic Substances Control (DTSC).

Based on a search of hazardous waste and substances sites listed in the DTSC “EnviroStor” database; a search of leaking underground storage tank (LUST) sites listed in the SWRCB “GeoTracker” database; and a search of solid waste disposal sites identified by the SWRCB with waste constituents above hazardous waste levels outside the waste management unit, there were no sites listed on or adjacent to the Project site. The closest sites are military explosives investigations over 5 miles north of the site and west of the site in the Salton Sea. Other historical sites related to pesticides and other agricultural chemicals are mapped in Calipatria. Since no sites are listed on or adjacent to the Project site, the Project would have no impact related to hazardous waste sites.

- e) **No Impact.** The Cliff Hatfield Memorial Airport is located over 5 miles southeast of the Project site. Additionally, the Project does not propose new tall structures and the Project area is not located sufficiently near either a private airstrip or public airport to pose a safety risk. Therefore, there would be no Project-related impacts on airport safety.
- f) **Less Than Significant Impact.** The roadways immediately adjacent to the Project site are not part of an emergency evacuation route and therefore construction and operation activities would have no impact on a designated emergency route. Transport of soil stabilizers and aggregate base for the Project would require trucks on SR-111 but temporary truck travel would not impact any designated emergency staging areas. Therefore, the Project would have a less than significant impact on emergency evacuation plans.
- g) **No Impact.** Application of soil stabilizers on the Project site would not impact the already low risk of wildfire on the site. The Project does not include habitable structures or propose the addition of dry combustible fuels. The Project would not disturb the existing vegetated areas in the southern portion of the Project site or alter off-site vegetation such that fire risk increased. Therefore, the Project would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. There would be no Project-related impacts on wildfire risk.

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2.3.10 Hydrology and Water Quality

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or offsite?	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	☐	☐	☒	☐
iii. Create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or?	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Discussion: The Salton Sea lies in a closed desert basin in Riverside and Imperial counties in southern California. It has no natural outlet and reduced inflows from water conservation, recycling, and transfers have lowered the level of the Salton Sea and increased salinity. The Project site was inundated with Salton Sea water from the late 1940s until around 2012 to 2014 when it was fully exposed due to a reduction in drain flows. Due to berms, roads, and other features, the site is hydraulically inaccessible to all overland flood flows, with the exception of the northwest Project area which receives uncontrolled surface runoff from Red Hill. The remainder of the site receives only rainfall precipitation, estimated at less than 3.5 inches annually (Weather Spark 2026). The ground surface elevations of the site range from approximately 232 to 226 feet below

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msl with the topographic gradient generally from east to west, towards the Salton Sea (Formation 2023). In the southeast corner of the site, there are agricultural runoff surface discharges originating from adjacent upslope agricultural areas. These flows are variable and the actual volume discharged is unquantified. Drainage water from adjacent agricultural areas is currently conveyed through the Project site in two ditches (Figure 2). The Southern Ditch conveys drainage along the southern boundary of the site and beyond the western Project boundary. The Center Ditch starts in the southeast corner of the Project site, bisects the Project area, and outfalls into a constructed detention basin located along the western Project boundary.

- a) **Less than Significant Impact.** The Project site is within the Salton Sea planning area of the Colorado River Basin Region (RWQCB 2024). Beneficial uses and water quality objectives are specified in the Water Quality Control Plan for the Region (Basin Plan) prepared by the RWQCB (2024). Beneficial uses for waterways in the Project area are noted in Table 7; amendments to the beneficial uses of the Salton Sea are pending which would designate the Inland Saline Water Habitat beneficial use and de-designate the Warm Freshwater Habitat beneficial use (RWQCB 2026).

Table 7. Beneficial Uses of Waterways in the Project Area

Surface water	AQUA	FRSH	REC-1	REC-2	IND	WARM	WILD	POW	RARE
Alamo River		X	X ¹	X		X	X	P	X ²
Imperial Valley Drains		X	X ^{1,3}	X ³		X	X		X ²
Salton Sea	X		X	X	P	X	X		X

Source: RWQCB 2024

Notes:

¹ The only REC I usage that is known to occur is from infrequent fishing activity.

² Rare, endangered, or threatened wildlife exists in or utilizes some of these waterway(s). If the RARE beneficial use may be affected by a water quality control decision, responsibility for substantiation of the existence of rare, endangered, or threatened species on a case-by-case basis is upon the California Department of Fish and Wildlife on its own initiative and/or at the request of the Regional Water Board; and such substantiation must be provided within a reasonable time frame as approved by the Regional Water Board

³ Unauthorized use

Key:

AQUA = aquaculture

FRSH = freshwater replenishment

IND = industrial service supply

P = potential use

POW = hydropower generation

RARE = preservation of rare, threatened or endangered species

REC-1 = water contact recreation

REC-2 = noncontact water recreation

WARM = warm freshwater habitat

WILD = wildlife habitat

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Narrative and numeric water quality standards applicable to all surface waters in the Colorado River Basin Region are specified for: aesthetic qualities, tainting substances, toxicity, temperature, pH, dissolved oxygen, suspended solids, settleable solids, total dissolved solids (TDS), bacteria, biostimulatory substances, sediment, turbidity, radioactivity, chemical constituents, and pesticide waste. Additionally, waterbody-specific numeric objectives for the protection of beneficial uses are defined for:

- Salton Sea – TDS and selenium
- Irrigation Supply Channels – herbicide use restrictions, TDS
- Alamo River – TDS

A prohibition of sediment/silt discharge is established for the Imperial Valley, including the Alamo River, New River, all Imperial Valley Drains, and their tributaries. The Clean Water Act section 303(d) list of impaired water bodies identifies the Salton Sea, Alamo River, and Imperial Valley Drains as impaired waters. Total maximum daily load (TMDL) processes are in place to address water quality impairments for the Alamo River and Imperial Valley Drains (sedimentation/siltation) and waterways of the Imperial Valley (organophosphate and organochlorine compounds).

Water Quality Impacts During Construction. During Project construction, disturbance to surface soils would result from berm and access route construction, access road improvement, and preparation of the in-field staging area. Because site disturbance would exceed 1 acre during construction, stormwater would be managed in accordance with BMPs identified in a SWPPP completed in compliance with the NPDES General Permit for Storm Water. Table 8 summarizes typical measures anticipated to be implemented during Project construction.

The existing vegetated wetlands and ditches would be buffered from berm and roadway construction and the application of soil stabilizer by a minimum of 300 feet. Resource protection berms would be installed to protect wetlands and ditches from construction and operation of the dust control project (Figure 2). With the required SWPPP implementation during construction and installation of the resource protection berms, the Project would not result in discharges to wetlands, drains, the Alamo River, or the Salton Sea. Project construction would not require dewatering. Impacts to water quality during Project construction would be less than significant.

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Table 8. Summary of Anticipated Construction Stormwater Best Management Practices

Best Management Practices for the Protection of Stormwater Quality During Construction
<u>Housekeeping Measures</u> • Conduct an inventory of products used or expected to be used • Cover and/or berm loose stockpiled construction materials • Store chemicals in watertight containers
<u>Employee Training</u> • Brief staff on the importance of preventing stormwater pollution • Have staff review SWPPP • Conduct refresher training during the wet season • Document training
<u>Erosion and Sediment Controls</u> • Provide effective cover for inactive areas – cover, berm, or direct runoff to suitable areas • Establish and maintain effective perimeter control • Stabilize construction entrances and exits to control sediment – inspect ingress and egress points daily, and maintain as necessary • Control dust during earthwork • Place sandbags or other barriers to direct stormwater flow to suitable areas
<u>Spill Prevention and Control</u> • Inspect construction equipment for leaking • Use drip pans until equipment can be repaired • Cleanup spills Immediately – remove adsorbent promptly • Notify the proper entities in the event of a spill
<u>Hazardous Waters Management and Disposal</u> • Store hazardous wastes in covered, labeled containers with secondary containment for liquid hazardous wastes • Store wastes separately to promote recycling and to prevent undesirable chemical reactions
<u>Materials Handling and Storage</u> • Establish a designated area for hazardous materials including fuels • Berm, cover, and/or contain the storage area as necessary to prevent materials from leaking or spilling • Store the minimum volume of hazardous materials necessary for the work
<u>Vehicle and Equipment Maintenance, Repair, and Storage</u> • Inspect vehicles and equipment regularly • Conduct maintenance as necessary • Designate areas for storage – where fluids can be captured and disposed of properly
<u>Scheduling</u> • Avoid work during storm events • Stabilize work areas prior to predicted storm events

Water Quality Impacts from Fuel Use. Construction would require the routine transport, use, and storage of limited quantities of gasoline and diesel fuel, and potentially degreasers and solvents for construction vehicle maintenance. An in-field staging area would be developed for the Project and a previously disturbed site north the BACM area may also be used for vehicle and equipment staging (Figure 2). As noted above (Section 2.3.9), IID implements standard BMPs for equipment

use and vehicle re-fueling. With adherence to the BMPs for hazardous materials use, impacts related to release or accidental exposure to humans or the environment, including impacts on water quality, would be less than significant.

Water Quality Impacts Soil Stabilizer Use. Soil stabilizers used for the Project would be ecologically safe and biodegradable copolymers used to stabilize and solidify soils. The surface crust formed by the soil stabilizer reduces wind and water erosion, a beneficial impact on stormwater quality. Project design includes a 300-ft buffer between soil stabilizer application and existing wetlands and ditches, as well as construction of resource protection berms. As designed, the Project would not discharge soil stabilizers to onsite waters and impacts to water quality would be less than significant.

Impacts to groundwater from surface soil stabilizer application are not anticipated. Long-term declining groundwater level trends, measured from year to year, are evident in the near-surface groundwater system. Based on data collected between 2016 and 2021, the rate of groundwater level decline in the Alamo South area is approximately 0.7 to 0.9 feet per year (IID 2023). More recent measurements of groundwater level trends just west of the Project area indicate groundwater is approximately 12 feet below the ground surface (IID 2025). Due to the upward gradient, there is little to no potential for the surface stabilizer product to reach groundwater. Once cured, the soil stabilizer is water-resistant, with little to no potential for downward movement through the soil. Therefore, the use of soil stabilizers would have a less than significant impact on groundwater quality.

- b) **Less than Significant Impact.** In April 2022, depth to groundwater on the site ranged from approximately 3 feet bgs beneath the wetland area to 11 feet bgs in the northwestern portion of the site (Formation 2023). The Project would apply soil stabilizers such that a water-resistant surface crust is formed over approximately 334 acres. However, on-site drainages, wetlands and a 300-foot buffer would not be impacted by the Project. Therefore, the Project would not substantially alter groundwater recharge at the site. Application of soil stabilizer would require the use of water trucks which would be filled from the existing IID Vail 3 Drain. Use of drain water could result in a minor decrease in percolation in the channels, the impact would be temporary and less than significant on groundwater supply. Therefore, Project-related impacts to groundwater would be less than significant.
- c) i, ii, iii **Less than Significant Impact.** Due to berms, roads, and other features, the site is hydraulically inaccessible to all overland flood flows, with the exception of the northwest Project area which receives uncontrolled surface runoff from Red Hill. The remainder of the site only receives direct precipitation, estimated at less than 3.5 inches annually (Weather Spark 2026). Installation of the access routes and resource protection berms would result in localized changes to drainage patterns on the site. As under existing conditions, stormwater would continue to flow towards the Salton Sea. The proposed resource protection berms would protect existing on-site wetlands associated with the Southern Ditch. Therefore, modifications in the drainage pattern resulting from the Project would not result in substantial erosion or siltation, flooding, or add a substantial source of polluted runoff. As designed, the impact on drainage pattern and stormwater drainage would be less than significant.

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iv **Less than Significant Impact.** Due to berms, roads, and other features, the site is hydraulically inaccessible to overland flood flows, with the exception of the northwest Project area which receives uncontrolled surface runoff from Red Hill. However, the Project site is mapped within Special Flood Hazard Area - Zone A, which is defined as: no base flood elevations determined, subject to inundation by the 100-year flood (FEMA 2022). The Alamo River is one of two main drainages in the valley and trends northeasterly to the east and north of the Project site; flooding of the Alamo River may cause overtopping of the channels and inundation (CTE 2023). The Project includes berm and access route construction and application of soil stabilizers; no structures are proposed that could redirect flood flows. No levees or dams are present on the Project site and no off-site levees or dams would be modified as part of the Project. Therefore, the Project would have a less than significant impact on flood hazards.

- d) **Less than Significant Impact.** According to the State of California Geological Survey, Tsunami Hazard Area Map (California Department of Conservation 2022c), the site is not located within a tsunami inundation zone. However, due to the active faulting in the area and presence of nearby confined bodies of water (Salton Sea) oscillatory waves are possible (CTE 2023). Although a localized seiche is possible, it would not expose people or structures to loss, injury or death. Inundation of the BACM areas would not risk release of pollutants as soil stabilizers are non-hazardous and water resistant once cured. Damage to access routes or berms caused by inundation, if any, would be repaired by re-installation of facilities. Therefore, impacts related to tsunami, seiche or flooding inundation would be less than significant.
- e) **No Impact.** The state of California has adopted the Sustainable Groundwater Management Act (SGMA) to mandate sustainable groundwater development. This legislation mandates avoidance of adverse groundwater conditions by defining what constitutes an adverse condition (a minimum threshold) and by requiring avoidance of the adverse condition by management action. The SGMA Basin Prioritization Dashboard maps the Imperial Valley groundwater basin as very low (California Department of Water Resources 2026). Since the Project would not include groundwater pumping, would not impact groundwater quality, and would have a less than significant impact on groundwater volume, there would be no impact on SGMA planning in this low priority basin.

As noted above, several waterways in the Project area are listed as impaired and TMDL processes are on-going. The Project includes construction of resource protection berms to avoid impacts to on-site drainages that discharge to the Salton Sea. During construction, BMPs would be implemented to protect the quality of stormwater flows; discharges to the Alamo River are not anticipated. Since the Project would not conflict with SGMA or Basin Plan goals, the Project would have no adverse impacts on water resources planning.

2.3.11 Land Use and Planning

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Discussion: The Project is located on IID-owned land in a remote area adjacent to the Salton Sea. The closest communities to the Project area are Niland and Calipatria over 4 miles from the Project site. No permanent habitable structures are located on or immediately adjacent to the Project site, and none are planned as part of the proposed Project. The Project site is posted and public access is not permitted.

- a) **No Impact.** The closest communities to the Project site are located over 4 miles from the Project site. No habitable structures are located on or immediately adjacent to the Project site, and none are planned as part of the proposed Project. The Project would be implemented on an area of disturbed playa adjacent to the Salton Sea. Therefore, there would be no Project-related impacts on established communities.
- b) **Less than Significant Impact.** The Project site is located in Imperial County with existing zoning of S-1-G, A-3-G, A-3-RE, and S-1-RE with land use designations of Recreation/Open Space, Agricultural, and Government/Special Public. The majority of the site is designated as Salton Sea (Imperial County 2025a). For safety, public access to the site is restricted.

The Project site is within the Salton Sea Known Geothermal Resource area and the Draft Lithium Valley Specific Plan area (Imperial County 2025b). The RE Overlay Zone consists of: 1) the Geothermal Energy overlay for areas where existing and future development has been environmentally reviewed for geothermal renewable energy facilities; and, 2) the Renewable/Geothermal overlay for areas that could be developed with any form of renewable energy technology, including geothermal production (Imperial County Title 9 Division 17). The purpose of the Specific Plan is to streamline permitting and approval for geothermal energy production and lithium extraction to allow expeditious development of renewable energy, mineral recovery and other supporting uses/infrastructure. IID has a lessee for the development of geothermal energy and lithium extraction on the Project site. Site and vehicular access for the lessee would be maintained as part of Project operations. No land use change is proposed as part of the dust control project and the site would remain open space. Since the Project would be consistent with the goals of the Draft Lithium Valley Specific Plan, it would not conflict with applicable planning and the impact on land use planning would be less than significant.

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2.3.12 Mineral Resources

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Discussion: A mineral resource is a naturally occurring mineral deposit with a feasible way to be economically extracted. California’s Mineral Resources Program focuses on industrial materials, construction materials, and metallic and rare minerals. The California Geological Survey (California Department of Conservation 2025) does not have a mapped mineral land classification for the Project area. The closest mapped mines are sand and gravel operations located over 10 miles northeast of the Project site (California Department of Conservation 2016). Imperial County (2016) maps a pumice mine just northwest of the Project site and a potassium and salt mine south of the site.

a) and b) **Less Than Significant Impact**

Sand and Gravel. Under the proposed Project approximately 3,680 CY of Class II aggregate base (mixture of sand, gravel, crushed stone, and recycled materials) would be used on the site to establish the in-field staging area and to improve an existing access road. Aggregate would be obtained locally by the construction contractor. Based on the limited volumes required, the proposed would not result in a substantial loss of availability of locally important sand and gravel resource. Impacts on gravel mining operations in the vicinity of the Project site would be less than significant.

Lithium. The Project site is within the Salton Sea Known Geothermal Resource area and the Draft Lithium Valley Specific Plan area (Imperial County 2025b). Lithium is a critical mineral due to its importance in the manufacture of batteries and the transition to renewable energy. It occurs naturally in various forms including lithium carbonate, lithium hydroxide and lithium chloride. In Lithium Valley, brine can be extracted from the geothermal reservoir and serve as two beneficial resources: (1) a heat source for geothermal electricity production, and (2) a source of lithium. The purpose of the Specific Plan is to streamline permitting and approval for geothermal energy production and lithium extraction to allow expeditious development of renewable energy, mineral recovery and other supporting uses/infrastructure. IID has a lessee for the development of geothermal energy and lithium extraction on the Project site. Access for the lessee would be maintained as part of Project operations. Since the Project would be consistent with the goals of the Draft Lithium Valley Specific Plan, the impact on lithium mineral extraction would be less than significant.

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2.3.13 Noise

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 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?	☐	☐	☐	☒

Discussion: Imperial County sets property line noise limits as part of the General Plan Noise Element (Imperial County 2015b). These standards do not apply to construction noise. The standard for construction noise is in decibels (dB) equivalent continuous sound pressure level (Leq).

Construction noise, from a single piece of equipment or a combination of equipment, shall not exceed 75 dB Leq, when averaged over an eight (8) hour period, and measured at the nearest sensitive receptor. This standard assumes a construction period, relative to an individual sensitive receptor of days or weeks. In cases of extended length construction times, the standard may be tightened so as not to exceed 75 dB Leq when averaged over a one (1) hour period. Construction equipment operation shall be limited to the hours of 7 a.m. to 7 p.m., Monday through Friday, and 9 a.m. to 5 p.m. Saturday. No commercial construction operations are permitted on Sunday or holidays.

- a) **Less Than Significant Impact.** The Project site is located in a remote area surrounded by open space and agricultural and geothermal operations. The closest permanent structures are the Sono Bono National Wildlife Refuge Visitor Center and associated buildings (approximately 0.36 miles south of the Project site) and buildings associated with geothermal operations (over 1 mile southeast of the Project site). The closest sensitive receptors are homes and schools located in Niland and Calipatria over 4 miles from the Project site. The closest recreational receptors are located at Red Hill Marina Park (7581 Garst Road), adjacent to the northern portion of the Project area (the staging area).

During construction of the Project, noise would be generated from heavy equipment including graders and water trucks, and delivery trucks bringing soil stabilizer to the

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Project site. Noise would be noticeable to campers and other recreationists present at Red Hill Marina Park. However, the minimum distance of 600 feet between soil stabilizer application and the nearest camping site is generally considered sufficient distance to reduce noise generated from trucks. For example, noise from a grader (the highest noise generating piece of equipment - 85 A-weighted decibels (dBA) at 50 feet (FHA 2018)) would attenuate to approximately 63 dBA at 600 feet (Canter 1977). Additionally, construction activity would not occur during 10:00 p.m. to 6:00 a.m. when there is greater potential for noise disturbance to campers. Therefore, given the distance from the Project site to the closest receptors, the Project would not cause noise levels to exceed established thresholds (75 dB Leq averaged over 1 hour). Project-related noise impacts would be temporary and less than significant.

Noise generated during Project operation would result from monitoring and maintenance; similar equipment would be used as for construction. Since fewer pieces of equipment would be required, and over a shorter period, noise impacts would be less than that for Project construction. Due to the distance to the nearest receptors, noise impacts from Project operation would be less than significant.

- b) **Less Than Significant Impact.** Equipment used for Project construction may create minor groundborne vibration or groundborne noise. Since the closest habitable structures are over 600 feet away, impacts related to temporary groundborne vibration or noise would be less than significant.
- c) **No Impact.** The Cliff Hatfield Memorial Airport is located over 5 miles southeast of the Project site. Therefore, the Project is not located sufficiently near either a private airstrip or public airport to expose people residing or working in the area to experience excessive noise levels. There would be no Project-related impacts on noise near an airport/airstrip.

2.3.14 Population and Housing

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion:

- a) **Less Than Significant Impact.** Since the Project does not include construction of homes or businesses, it would not directly impact population growth in the Calipatria area. Application of the soil stabilizers would require workers to be in the area for approximately 16 weeks. IID operations and maintenance staff would also visit the site periodically to monitor the dust control BACM and to conduct maintenance, as required. The limited number of workers required for construction and operation would have a less than significant impact on population growth.
- b) **No Impact.** No habitable structures are located on or immediately adjacent to the Project area, and none are planned as part of the proposed Project. Therefore, there would be no impacts on housing from implementation of the Project.

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2.3.15 Public Services

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

Discussion:

- a) i – v) **No Impact.** Habitable structures are not present on the Project site and none are proposed as part of the Project. The limited number of construction workers required to implement the Project would not generate substantial population growth or create the need for new or expanded public services. Application of soil stabilizers would not alter the existing low risk of fire. Therefore, there would be no Project-related impacts related to provision of new or physically altered government facilities for fire protection, police protection, schools, parks, or other public facilities.

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2.3.16 Recreation

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Discussion:

- a) **Less than Significant Impact.** Habitable structures are not present on the Project site and none are proposed as part of the Project. The number of construction and operations workers required to implement the Project would not generate substantial population growth or create the need for new or expanded parks. Existing recreation facilities in the Project vicinity include the Sonny Bono Salton Sea National Wildlife Refuge with Headquarters and Visitor Center located at 906 West Sinclair Road. Red Hill Park is located northeast of the Project site at 7581 Garst Road. Operated by Imperial County, Red Hill Park includes recreational vehicle camping, tent camping, picnic tables, and seasonal hunting. Project construction and operation would have a less than significant impact on the physical deterioration of existing recreational facilities. Therefore, the Project would have a less than significant impact on neighborhood or regional parks or other recreation facilities.
- b) **No Impact.** The Project site is not a recreational facility and no new recreational facilities are proposed as part of the Project. Construction and operation of the Project would have no impact on new or expanded recreational facilities.

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2.3.17 Transportation and Traffic

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities.	☐	☐	☐	☒
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☒	☐	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

Discussion: Access to the Project site from the north would be from U.S. Highway 10 and SR-111 to local roads including West Sinclair Road and Garst Road. From the south, travel to the site would be from SR-78 to West Bannister Road to Forrester Road to Gentry Road. Haul trucks traveling on state routes and highways would comply with the State of California Vehicle Code including Weight Sections 35550 – 35558.

- a) **No Impact.** The Project does not include housing, employment, or roadway improvements relevant to alternative transportation measures. Therefore, there would be no Project-related impacts on alternative transportation plans and policies.
- b) **Less Than Significant Impact.** Vehicle trips related to the Project would include:
 - Soil Stabilizer delivery from Arizona - Up to 20 semi-tanker trips (530 miles roundtrip)
 - Class II aggregate delivery - Up to 285 truck trips from a local source delivered over several weeks
 - Equipment for berm and access route construction - During Project mobilization, vehicles required for construction (grader, dozer, water trucks) would be transported to the site. It is anticipated that individual vehicles and pieces of equipment would be transported to the site once, remain on-site for the duration of the construction period (approximately 16 weeks), and then be demobilized.
 - Water Transportation - Semi-truck trailers (up to 10 trips per day for 30 workdays) or on-road water trucks (up to 14 trips per day for 30 workdays) would be used to transport up to 850,000 gallons of water from Vail 3 Drain to the in-field staging area. The trucks will travel approximately 1 mile north along Garst Road (Figure 6).

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- Soil stabilizer application on the Project site - 6 water truck trips per day for up to 30 workdays, or two or three tractors for 12 to 16 weeks for hose reel and irrigation boom application.
- Worker trips - approximately 15 workers traveling to the Project site each day

CEQA Guidelines Section 15064.3 describes considerations for evaluating the transportation impacts of projects and states that vehicle miles traveled (VMT - the amount and distance of automobile travel attributable to a project) is generally the most appropriate measure of transportation impacts. The proposed Project is neither a housing or commercial development project nor a transportation project that would permanently increase VMT in the Project area. Per the Governor's Office of Planning and Research Technical Advisory (2018), projects that generate or attract fewer than 110 trips per day may generally be assumed to cause less-than-significant transportation impacts. Most of the trips related to the Project would occur during the construction phase and be temporary. During operations, vehicle travel would be related to periodic monitoring and maintenance and substantially less than 110 trips per day. Overall, impacts on VMT would be minor and less than significant.

- c) **Less Than Significant Impact with Mitigation Incorporated.** The Project does not include construction or modification of off-site roadways. Internal access routes would be created and an existing access road would be upgraded as part of the Project, but new roadway hazards for the public would not be created.

However, construction of the Project would require haul trucks on SR-111 for delivery of soil stabilizer and aggregate base. Since the intersections of SR-111 with local roads such as West Sinclair Road are not signalized, impacts related to traffic hazards are potentially significant. With implementation of mitigation measure TRANS-1 (Traffic Control Plan), impacts would be reduced to a less than significant level.

- d) **Less Than Significant Impact.** The Project does not include roadway alterations such that emergency access to the site would be altered. Materials deliveries necessary for the Project would require trucks on SR-111 but designated emergency staging areas would not be impacted. Construction would increase the volume of trucks travelling on SR-111 and local roadways but would not alter the access points. The impact of the addition of construction truck trips would be temporary and less than significant on emergency access.

Mitigation Measure

Implementation of the following mitigation measure would reduce impacts on transportation to less than significant levels.

TRANS-1 Traffic Control Plan. Prior to construction, IID or its construction contractor shall prepare and implement a Traffic Control Plan to document:

- Truck haul routes, construction and delivery hours

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- Construction traffic control and site access, including requirements for traffic control, flagging, and signage to ensure safe circulation for vehicles, bicycles, pedestrians, and emergency responders
- Identification of access points, designated staging areas, and parking restrictions
- Identification of potential road closures, if any

At least three days prior to construction, IID shall coordinate with emergency service providers (police, fire, and others) to notify them of the construction schedule.

2.3.18 Tribal Cultural Resources

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
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 in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Discussion: On February 3, 2022, a search of the Sacred Lands File (SLF) from the NAHC was requested. A response was received from the NAHC on March 24, 2022, indicating that the search results were positive for sacred lands and sacred sites associated with the Torres-Martinez Desert Cahuilla Indians. The NAHC also provided a contact list of local tribes and recommended further outreach for additional information. Copies of the correspondence letter to the NAHC requesting a SLF search and the tribal contact list (TCL) for the Project are contained in Appendix C of the Archaeological Survey Report for the Project (Stantec 2026). Consultation with Native American organizations and individuals was initiated to satisfy the requirements of AB 52. Pursuant to CEQA requirements, IID sent letters to the tribes on October 4, 2024, inviting them to consult regarding the Project's potential impacts to tribal cultural resources. Responses requesting consultation and/or cultural monitoring were received from the Quechan Tribe of the Fort Yuma Reservation, Viejas Band of Kumeyaay Indians, Cahuilla Band of Indians, Campo Band of Diegueno Mission Indians, and Agua Caliente Band of Cahuilla Indians. IID responded to consultation requests and is currently in communication regarding on site Kumeyaay and Agua Caliente Cultural Monitors. As of February 2026, consultation with tribal representatives is ongoing.

- a) i and ii) **Less than Significant Impact with Mitigation Incorporated.** Significant archaeological resources are not known for the Project area and the portion of the site proposed for implementation of soil stabilizers has been extensively disturbed by the current dust control measure (furrows). However, the Project would require additional earthwork and there is some limited potential for the discovery of previously unknown

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tribal resources in the Project area. Therefore, mitigation measures TCR-1 and TCR-2 shall be implemented to further protect unknown cultural resources. As mitigated, the Project would have a less than significant impact on CRHR-listed or eligible resources, or on resources significant to a California Native American tribe.

Mitigation Measures

Implementation of the following mitigation measures would reduce impacts on Tribal cultural resources to less than significant levels.

TCR-1 Tribal Notification. In the event that an archaeological resource inadvertently discovered during Project construction is determined to be potentially of Native American origin based on the initial assessment of the find by a qualified archaeologist pursuant to California Public Resources Code Section 21083.2(i), the Native American tribes that consulted on the proposed Project pursuant to California Assembly Bill 52 shall be notified and be provided information about the find to allow for early input from the tribal representatives with regards to the potential significance and treatment of the resource.

If, as a result of the resource evaluation and tribal consultation process, the resource is considered to be a tribal cultural resource in accordance with California Public Resources Code Section 21074, determined to be eligible for inclusion in the CRHR or a local register of historical resources or determined to be significant by IID (the CEQA lead agency), the qualified archaeologist shall monitor all remaining ground-disturbing activities in the area of the resource, and a tribal monitor from a consulting Native American tribe shall be invited to monitor the ground-disturbing activities. The tribal monitor shall be ancestrally affiliated with the Project area and qualified by their tribe to monitor tribal cultural resources.

The input of all consulting tribes shall be taken into account in the preparation of any required treatment plan for the resources prepared by the qualified archaeologist. Work in the area of the discovery may not resume until evaluation and treatment of the resource are completed and/or the resource is recovered and removed from the site. Construction activities may continue on other parts of the construction site while evaluation and treatment of the resource take place.

TCR-2 Tribal Monitoring. Following AB 52 consultation, Native American organizations and individuals requesting on-site monitoring shall be invited to monitor Project-related ground-disturbing activities in which they have determined have a reasonable likelihood of encountering tribal cultural resources. The tribal monitor shall be ancestrally affiliated with the Project area and qualified by their tribe to monitor tribal cultural resources. Before initiating ground-disturbing activities, the tribal monitor shall conduct a brief awareness training session for the benefit of all construction workers and supervisory personnel. The training, which could be held in conjunction with the Project's initial on-site safety meeting, shall explain the importance of and legal basis for the protection of significant tribal cultural resources. Each worker shall be notified of the proper procedures to follow in the event that tribal cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and immediately contacting the site supervisor and IID.

2.3.19 Utilities and Service Systems

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Discussion:

- a) **Less than Significant Impact.** Habitable structures are not present on the Project site and none are proposed as part of the Project. Water would be used during Project construction for dust suppression and to dilute soil stabilizer. Water would be obtained from the existing Vail 3 Drain. Existing water, wastewater, electric power, natural gas, or telecommunications facilities in the Project vicinity would not be impacted by construction and operation of the proposed Project. Utilities are not proposed for installation as part of the Project. Therefore, Project-related impacts from new or expanded utilities would be less than significant.
- b) **Less than Significant Impact.** Water would be used during Project construction for dust suppression and to dilute soil stabilizer. Once applied, the soil stabilizer BACM would suppress dust on the site without use of water. The impact on water supplies would be less than significant.
- c) **Less Than Significant Impact.** Wastewater generated at portable toilets at the Project site during construction would be treated offsite at a location determined by the construction

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contractor. Local facilities include the Calipatria Wastewater Treatment Plant, operated in compliance with Waste Discharge Requirements from the Colorado River Basin RWQCB. The limited number of workers required to implement the Project would not generate substantial population growth or create the need for new or expanded wastewater service facilities. Impacts on wastewater service would be less than significant.

- d) and e) **Less Than Significant Impact.** Application of soil stabilizers would result in the generation of minor volumes of construction waste (e.g., worker refuse) requiring disposal. None of the wastes generated would be anticipated to be classified as hazardous. Solid waste generated by construction workers would be disposed at a permitted landfill in compliance with applicable regulations. The construction contractor would select the disposal location, however, the Mesquite Regional Landfill is located nearby in El Centro. Therefore, impacts related to solid waste disposal and solid waste regulations would be less than significant.

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2.3.20 Wildfire

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands as classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, or other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Discussion: CalFire is required by state law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. None of the areas surrounding the Salton Sea, including the Project area, are mapped within a Fire Hazard Severity Zone (CalFire 2022).

- a) **Less Than Significant Impact.** The roadways immediately adjacent to the Project site are not part of an emergency evacuation route and therefore construction and operation activities would have no impact on a designated emergency route. Soil stabilizer transport necessary for the Project would require trucks on SR-111 but temporary truck travel would not impact any designated emergency staging areas. Therefore, the Project would have a less than significant impact on emergency access and evacuation plans.
- b) **No Impact.** Application of soil stabilizers on the Project site would not impact the already low risk of wildfire on the site. The Project does not include habitable structures or propose the addition of dry combustible fuels. The Project would not disturb the existing vegetated areas in the southern portion of the Project site or alter off-site vegetation such that fire risk increased. Therefore, the Project would not expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. There would be no Project-related impacts on wildfire risk.

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- c) **No Impact.** The Project includes improvement of an existing internal site roadway (covered with crushed aggregate). No other utilities are proposed, including electrical systems that could exacerbate fire risk. The Project would have no impact on wildfire risk.
- d) **No Impact.** Habitable structures are not present on the Project site and none are proposed as part of the Project. Landslide and post-fire slope instability are not hazards identified for the Project area. Therefore, the Project would not expose people or structures to significant post-fire risks.

2.3.21 Mandatory Findings of Significance

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?	☐	☐	☐	☒
c) 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, effects of other current projects, and the effects of probable future projects.)?	☐	☒	☐	☐
d) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Discussion:

- a) **Less than Significant Impact with Mitigation Incorporated.** As designed, the Project would avoid impacts to on-site vegetated wetlands and ditches and offsite agricultural drainage channels. Mitigation measures have been defined to reduce biological resources impacts to less than significant levels.

Disturbance to significant cultural or tribal resources during Project construction and operation is not anticipated. However, mitigation measures have been identified to reduce impacts to unknown resources, should any be uncovered during Project construction. As mitigated, impacts on California history and prehistory would be less than significant.

- b) **No Impact.** The Project would control dust on approximately 334 acres of previously disturbed playa at the Salton Sea. The Project would be constructed over approximately 16 weeks, and maintained thereafter in order to reduce dust emissions in the Imperial Valley. There are no short-term goals related to the Project that would be disadvantageous to this long-term goal.

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- c) **Less than Significant Impact with Mitigation Incorporated.** Cumulatively with other dust control projects around the Salton Sea, the Project would be beneficial for air quality. Other projects in the area also include geothermal developments and lithium extraction. The Project site is currently leased for geothermal operations and access would be maintained for the lessee with implementation of the Project. Energy development projects in the Project area would be implemented in compliance with Imperial County requirements, and the projects would be reviewed under CEQA, with mitigation measures identified as relevant. As mitigated, cumulative impacts with the proposed Project would be less than significant.
- d) **Less than Significant Impact.** The project would control dust on approximately 334 acres of previously disturbed playa at the Salton Sea. The impact on air quality would be beneficial to human beings. Temporary adverse impacts to air quality would occur during Project construction from use of heavy equipment and soil stabilizer and aggregate hauling. However, impacts would be below established thresholds, temporary, and therefore less than significant.

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3.2 ACRONYMS AND ABBREVIATIONS

°F	degrees Fahrenheit
AB	Assembly Bill
APN	Assessor's Parcel Number
ARPA	Archeological Resources Protection Act
BACM	Best Available Control Measure
bgs	below ground surface
BLM	(United States) Bureau of Land Management
BMP	best management practice
BP	before present
BRTR	Biological Resources Technical Report
BSA	biological study area
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCH	Consortium of California Herbaria
CCR	California Code of Regulations
CDFG	California Department of Fish and Game (now CDFW)
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CGS	California Geological Survey
CH ₄	methane
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalents
CRHR	California Register of Historic Resources
CSC	Cox Sand Catcher
CY	cubic yard
dB	decibel
dBA	A-weighted decibel
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EPA	(United States) Environmental Protection Agency

Section 3 – References, Abbreviations and Report Preparation

Farmland	Prime Farmland, Unique Farmland, or Farmland of Statewide Importance
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FGC	Fish and Game Code
FMMP	Farmland Mapping and Monitoring Program
GHG	greenhouse gas
GWP	global warming potential
HCP	Habitat Conservation Plan
HFC	hydrofluorocarbon
ICAPCD	Imperial County Air Pollution Control District
IID	Imperial Irrigation District
IS	Initial Study
Leq	equivalent continuous sound pressure level
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
MND	Mitigated Negative Declaration
mph	miles per hour
msl	mean sea level
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
NF ₃	nitrogen trifluoride
NHMLA	Natural History Museum of Los Angeles County
NHPA	National Historic Preservation Act
NO ₂	nitrogen dioxide
NO _x	nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
O ₃	ozone
OHWM	Ordinary High Water Mark
Pb	lead
PDCP	Proactive Dust Control Plan
PFC	perfluorocarbon
PM ₁₀	particulate matter 10 microns or less in diameter

Section 3 – References, Abbreviations and Report Preparation

PM _{2.5}	particulate matter 2.5 microns or less in diameter
Project	Red Hill Bay Best Available Control Measure Project
RE	Renewable Energy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SCIC	South Coastal Information Center
SDNHM	San Diego Natural History Museum
SF ₆	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act
SIP	State Implementation Plan
SLF	Sacred Lands File
SO ₂	sulfur dioxide
SR	State Route
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TCL	tribal contact list
TDS	total dissolved solids
TMDL	total maximum daily load
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VMT	vehicle miles traveled
VOC	volatile organic compound
WEAP	Worker Environmental Awareness Program
WOTUS	Waters of the United States

3.3 PREPARERS OF THE INITIAL STUDY

Lead Agency:

Imperial Irrigation District

P.O. Box 937

333 E. Barioni Boulevard

Imperial, California 92251

Jessica Humes, Supervisor, Environmental Compliance

Technical Assistance Provided by:

Stantec Consulting Services Inc.

300 North Lake Avenue, Suite 1080

Pasadena, California 91101

Sarah Garber, PMP, CPP, Project Manager

Jared Varonin, Biological Resources

Colleen Hulbert, Cultural Resources

Alyssa Bell, PhD, Paleontological Resources

Danny Law, GIS

**Imperial Irrigation District
Red Hill Bay Best Available Control Measure Project
CEQA Initial Study**

Appendix A Air Quality Model Output Files (Stantec 2026)

Red Hill Bay_January 2026 Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Red Hill Bay_January 2026
Construction Start Date	1/1/2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.40000
Precipitation (days)	4.80000
Location	33.17553276645502, -115.61434411300368
County	Imperial
City	Unincorporated
Air District	Imperial County APCD
Air Basin	Salton Sea
TAZ	5600
EDFZ	19
Electric Utility	Imperial Irrigation District
Gas Utility	Southern California Gas
App Version	2022.1.1.37

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Other Non-Asphalt Surfaces	356.000	Acre	356.000	0.00000	0.00000	0.00000	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.87877	3.25659	31.0641	30.2932	0.05909	1.27161	92.8624	94.1341	1.17221	11.4800	12.6522	—	6,985.62	6,985.62	0.23948	0.31373	0.11688	7,075.76
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.28017	0.23441	2.32928	2.25030	0.00522	0.08926	11.1681	11.2573	0.08251	1.25648	1.33899	—	640.601	640.601	0.01845	0.04269	0.26232	654.047
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.05113	0.04278	0.42509	0.41068	0.00095	0.01629	2.03817	2.05446	0.01506	0.22931	0.24437	—	106.059	106.059	0.00305	0.00707	0.04343	108.285

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.87877	3.25659	31.0641	30.2932	0.05909	1.27161	92.8624	94.1341	1.17221	11.4800	12.6522	—	6,985.62	6,985.62	0.23948	0.31373	0.11688	7,075.76
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2026	0.28017	0.23441	2.32928	2.25030	0.00522	0.08926	11.1681	11.2573	0.08251	1.25648	1.33899	—	640.601	640.601	0.01845	0.04269	0.26232	654.047
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.05113	0.04278	0.42509	0.41068	0.00095	0.01629	2.03817	2.05446	0.01506	0.22931	0.24437	—	106.059	106.059	0.00305	0.00707	0.04343	108.285

3. Construction Emissions Details

3.1. Site Prep (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.74146	3.14387	29.1635	28.8082	0.04890	1.24251	—	1.24251	1.14311	—	1.14311	—	5,297.94	5,297.94	0.21491	0.04298	—	5,316.12
Dust From Material Movement	—	—	—	—	—	—	5.11082	5.11082	—	2.62664	2.62664	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.22551	0.18949	1.75780	1.73638	0.00295	0.07489	—	0.07489	0.06890	—	0.06890	—	319.328	319.328	0.01295	0.00259	—	320.424

Dust From Material Movement	—	—	—	—	—	—	0.30805	0.30805	—	0.15832	0.15832	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04116	0.03458	0.32080	0.31689	0.00054	0.01367	—	0.01367	0.01257	—	0.01257	—	52.8684	52.8684	0.00214	0.00043	—	53.0498
Dust From Material Movement	—	—	—	—	—	—	0.05622	0.05622	—	0.02889	0.02889	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09414	0.08507	0.11420	1.06599	0.00000	0.00000	38.8068	38.8068	0.00000	3.90061	3.90061	—	223.442	223.442	0.01100	0.00868	0.02245	226.327
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.04317	0.02765	1.78632	0.41905	0.01019	0.02910	48.9448	48.9739	0.02910	4.95273	4.98183	—	1,464.24	1,464.24	0.01358	0.23038	0.07948	1,533.31
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00605	0.00552	0.00684	0.08137	0.00000	0.00000	2.30841	2.30841	0.00000	0.23204	0.23204	—	14.4787	14.4787	0.00064	0.00052	0.02258	14.6732
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00269	0.00175	0.10562	0.02494	0.00061	0.00175	2.91155	2.91330	0.00175	0.29467	0.29642	—	88.2148	88.2148	0.00082	0.01386	0.07976	92.4444
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00110	0.00101	0.00125	0.01485	0.00000	0.00000	0.42128	0.42128	0.00000	0.04235	0.04235	—	2.39711	2.39711	0.00011	0.00009	0.00374	2.42931

Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00049	0.00032	0.01928	0.00455	0.00011	0.00032	0.53136	0.53168	0.00032	0.05378	0.05410	—	14.6050	14.6050	0.00014	0.00229	0.01321	15.3052

3.3. Stabilizer Application (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.43473	0.36120	3.10642	3.55223	0.00670	0.11539	—	0.11539	0.10616	—	0.10616	—	591.670	591.670	0.02400	0.00480	—	593.700
Dust From Material Movement	—	—	—	—	—	—	0.00000	0.00000	—	0.00000	0.00000	—	—	—	—	—	—	—
Architectural Coatings	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00728	0.00529	0.16111	0.08505	0.00053	0.00119	0.97927	0.98046	0.00119	0.09887	0.10006	—	70.3390	70.3390	0.00146	0.01111	0.00325	73.6898
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03573	0.02969	0.25532	0.29196	0.00055	0.00948	—	0.00948	0.00873	—	0.00873	—	48.6304	48.6304	0.00197	0.00039	—	48.7973

Dust From Material Movement	—	—	—	—	—	—	0.00000	0.00000	—	0.00000	0.00000	—	—	—	—	—	—	—
Architectural Coatings	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00063	0.00047	0.01285	0.00687	0.00004	0.00010	0.07943	0.07953	0.00010	0.00802	0.00812	—	5.76621	5.76621	0.00012	0.00090	0.00445	6.04256
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00652	0.00542	0.04660	0.05328	0.00010	0.00173	—	0.00173	0.00159	—	0.00159	—	8.05132	8.05132	0.00033	0.00007	—	8.07895
Dust From Material Movement	—	—	—	—	—	—	0.00000	0.00000	—	0.00000	0.00000	—	—	—	—	—	—	—
Architectural Coatings	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00012	0.00009	0.00235	0.00125	0.00001	0.00002	0.01450	0.01451	0.00002	0.00146	0.00148	—	0.95466	0.95466	0.00002	0.00015	0.00074	1.00041
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05379	0.04861	0.06526	0.60914	0.00000	0.00000	22.1753	22.1753	0.00000	2.22892	2.22892	—	127.681	127.681	0.00628	0.00496	0.01283	129.329
Vendor	0.02553	0.01332	1.72878	0.17853	0.01173	0.03505	5.15776	5.19281	0.03505	0.60101	0.63607	—	1,713.59	1,713.59	0.01204	0.26940	0.09574	1,794.27
Hauling	0.03148	0.02346	0.57285	0.38087	0.00123	0.00185	41.2164	41.2183	0.00185	4.11467	4.11652	—	147.622	147.622	0.00556	0.02346	0.00506	154.756
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.00471	0.00430	0.00533	0.06340	0.00000	0.00000	1.79876	1.79876	0.00000	0.18081	0.18081	—	11.2821	11.2821	0.00050	0.00041	0.01759	11.4336
Vendor	0.00211	0.00111	0.14006	0.01463	0.00096	0.00288	0.41877	0.42165	0.00288	0.04887	0.05175	—	140.838	140.838	0.00099	0.02214	0.13102	147.592
Hauling	0.00274	0.00208	0.04546	0.03075	0.00010	0.00015	3.34311	3.34326	0.00015	0.33375	0.33390	—	12.0630	12.0630	0.00046	0.00188	0.00692	12.6407
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00086	0.00079	0.00097	0.01157	0.00000	0.00000	0.32827	0.32827	0.00000	0.03300	0.03300	—	1.86788	1.86788	0.00008	0.00007	0.00291	1.89297
Vendor	0.00038	0.00020	0.02556	0.00267	0.00018	0.00053	0.07643	0.07695	0.00053	0.00892	0.00944	—	23.3174	23.3174	0.00016	0.00367	0.02169	24.4355
Hauling	0.00050	0.00038	0.00830	0.00561	0.00002	0.00003	0.61012	0.61015	0.00003	0.06091	0.06094	—	1.99716	1.99716	0.00008	0.00031	0.00115	2.09282

4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Prep	Site Preparation	1/1/2026	1/31/2026	5.00000	22.0000	—
Stablizer Application	Grading	2/1/2026	3/13/2026	5.00000	30.0000	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Prep	Rubber Tired Dozers	Diesel	Average	3.00000	8.00000	367.000	0.40000
Site Prep	Tractors/Loaders/Back hoes	Diesel	Average	4.00000	8.00000	84.0000	0.37000
Stablizer Application	Pumps	Diesel	Average	3.00000	8.00000	11.0000	0.74000
Stablizer Application	Other Material Handling Equipment	Diesel	Average	1.000000	8.00000	93.0000	0.40000

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Prep	Worker	17.5000	18.5000	LDA,LDT1,LDT2
Site Prep	Vendor	0.00000	10.2000	HHDT,MHDT
Site Prep	Hauling	22.0000	20.0000	HHDT
Site Prep	Onsite truck	0.00000	—	HHDT
Stablizer Application	Worker	10.00000	18.5000	LDA,LDT1,LDT2
Stablizer Application	Vendor	2.00000	265.000	HHDT
Stablizer Application	Hauling	28.0000	1.000000	HHDT
Stablizer Application	Onsite truck	6.00000	3.00000	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Control Strategies Applied	PM10 Reduction	PM2.5 Reduction
Apply dust suppressants to unpaved roads	84%	84%
Limit vehicle speeds on unpaved roads to 25 mph	77%	77%
Sweep paved roads once per month	9%	9%

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Stablizer Application	0.00000	0.00000	0.00000	0.00000	0.00000

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Prep	0.00000	0.00000	33.0000	0.00000	0.00000
Stablizer Application	0.00000	0.00000	0.00000	0.00000	0.00000

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	3	74%	74%

5.7. Construction Paving

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00000	456.543	0.03300	0.00400

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	32.2800	annual days of extreme heat
Extreme Precipitation	0.00000	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	9.21000	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	4	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	4	1	1	4
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	1	1	1	2
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	11.5993
AQ-PM	19.0915
AQ-DPM	9.08525
Drinking Water	30.6107
Lead Risk Housing	50.8003
Pesticides	90.5172
Toxic Releases	7.57689
Traffic	3.06250
Effect Indicators	—
CleanUp Sites	74.1881
Groundwater	77.9346
Haz Waste Facilities/Generators	93.2495
Impaired Water Bodies	99.9580
Solid Waste	86.5063
Sensitive Population	—
Asthma	87.6246

Cardio-vascular	83.1505
Low Birth Weights	26.8668
Socioeconomic Factor Indicators	—
Education	82.7006
Housing	51.3561
Linguistic	88.8348
Poverty	94.8995
Unemployment	99.3233

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	16.66880534
Employed	7.173104068
Median HI	5.299627871
Education	—
Bachelor's or higher	5.017323239
High school enrollment	16.8741178
Preschool enrollment	68.89516233
Transportation	—
Auto Access	18.40112922
Active commuting	51.10997049
Social	—
2-parent households	13.28114975
Voting	16.79712563
Neighborhood	—
Alcohol availability	70.25535737

Park access	33.85089183
Retail density	4.311561658
Supermarket access	49.58295907
Tree canopy	0.782753753
Housing	—
Homeownership	38.3036058
Housing habitability	30.96368536
Low-inc homeowner severe housing cost burden	26.76761196
Low-inc renter severe housing cost burden	52.89362248
Uncrowded housing	38.58591043
Health Outcomes	—
Insured adults	21.00603105
Arthritis	0.0
Asthma ER Admissions	30.1
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	41.7
Cognitively Disabled	50.3
Physically Disabled	19.5
Heart Attack ER Admissions	46.0
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	54.3

Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	14.1
Elderly	42.0
English Speaking	18.7
Foreign-born	65.3
Outdoor Workers	5.4
Climate Change Adaptive Capacity	—
Impervious Surface Cover	85.8
Traffic Density	4.9
Traffic Access	23.0
Other Indices	—
Hardship	92.9
Other Decision Support	—
2016 Voting	0.0

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	82.0000
Healthy Places Index Score for Project Location (b)	11.0000
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes

Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

8.1. Justifications

Screen	Justification
Construction: Construction Phases	stabilization to be applied over 30 days for In-field Application with Water Truck.
Construction: Off-Road Equipment	Pumps account for the water booster pump, stabilizing injection pump, and booster pump. Other Material Handling Equipment account for the blending system.
Construction: Trips and VMT	vendor trips for Soiltac assumed to come from Casa Grande, Arizona. 20 trucks trip (10 roundtrips) per day to transport water from IID's Vail Lateral 3 by semi-truck. 12 onsite truck trips (6 roundtrips) per day to account for In-field Application with Water Truck, conservatively assumes up to 2 mile of travel across the site, plus an additional 1 miles for application. All vendor, hauling, and onsite trucks are assumed to be HHDT.
Construction: On-Road Fugitive Dust	workers, hauling, and vendors anticipated to travel mostly on-road to the site, but would travel up to 1.5 miles on unpaved roadways to the laydown yard. Unpaved roads may be covered in gravel which with reduce emissions.
Construction: Architectural Coatings	No painting to occur

8.4. Construction

8.4.6. Trips and VMT

Phase Name	Trip Type	Model Parameter	Default Value	New Value
Site Prep	Worker	Miles per Trip	9.24000	18.5000
Site Prep	Vendor	One-Way Trips per Day	—	0.00000
Site Prep	Vendor	Miles per Trip	6.77000	10.2000
Site Prep	Hauling	One-Way Trips per Day	0.00000	22.0000
Stablizer Application	Worker	Miles per Trip	9.24000	18.5000
Stablizer Application	Vendor	One-Way Trips per Day	—	2.00000
Stablizer Application	Vendor	Miles per Trip	6.77000	265.000
Stablizer Application	Vendor	Vehicle Mix	HHDT,MHDT	HHDT
Stablizer Application	Hauling	One-Way Trips per Day	0.00000	28.0000
Stablizer Application	Hauling	Miles per Trip	20.0000	1.000000

8.4.7. On-Road Fugitive Dust

Phase Name	Model Parameter	Units	Default Value	New Value
Site Prep	Worker Trip Paved	%	50.0000	91.9000
Site Prep	Vendor Trip Paved	%	50.0000	99.4000
Site Prep	Hauling Trip Paved	%	50.0000	92.5000
Stablizer Application	Worker Trip Paved	%	50.0000	91.9000
Stablizer Application	Vendor Trip Paved	%	50.0000	99.4000
Stablizer Application	Hauling Trip Paved	%	50.0000	0.00000

8.4.8. Architectural Coatings

Phase Name	Model Parameter	Units	Default Value	New Value
Stablizer Application	Parking Area	sq ft	1,191,802	0.00000

**Imperial Irrigation District
Red Hill Bay Best Available Control Measure Project
CEQA Initial Study**

Appendix B Biological Resources Technical Report (Stantec 2026) (*separate file*)

**Imperial Irrigation District
Red Hill Bay Best Available Control Measure Project
CEQA Initial Study**

Appendix C Soiltac® Safety Data Sheet

SOILTAC® SAFETY DATA SHEET

SECTION 1 – IDENTIFICATION

PRODUCT NAME	SOILTAC® Soil Stabilizer & Dust Control Agent		
CHEMICAL FAMILY	Synthetic Copolymer Dispersion		
MANUFACTURER	Soilworks®, LLC – Soil Stabilization & Dust Control 11520 E Germann Rd Chandler, Arizona 85286 USA (800) 545-5420 USA +1 (480) 545-5454 International info@soilworks.com www.soilworks.com		
EMERGENCY PHONE NUMBERS	(800) 545-5420	USA	
	+1 (480) 545-5454	International	
U.S. DATA UNIVERSAL NUMBERING SYSTEM (DUNS NUMBER)	Soilworks, LLC 131946159		
U.S. DEPARTMENT OF DEFENSE COMMERCIAL AND GOVERNMENT ENTITY CODE (CAGE CODE)	Soilworks, LLC 3FTH5		
U.S. DEPARTMENT OF DEFENSE NATIONAL STOCK NUMBERS (NSN)	275-gallon (1,041 Liter)	Intermediate Bulk Container (IBC) Tote	6850-01-519-4708
	55-gallon (208 Liter)	Drum	6850-01-519-4706
U.S. GENERAL SERVICES ADMINISTRATION (GSA) CONTRACT	Soilworks, LLC	GS-07F-5364P	October 31, 2018

SYNONYMS/OTHER MEANS OF IDENTIFICATION

Soiltac is a formulated, high molecular weight, engineered, prime synthetic copolymer dispersion.

INTENDED USES

For industrial use only. Major industries include construction, mining, military, municipal, oil & gas, energy & renewable energy and transportation.

Abate dust, air quality control, control dust, controlling dust, desertification prevention, dune stabilization, dust abatement, dust control, dust control agent, dust control material, dust control product, dust elimination, dust inhibitor, dust mitigation, dust palliative, dust pollution control, dust pollution prevention, dust prevention, dust reduction, dust retardant, dust stabilization, dust stabilizer, dust suppressant, dust suppression, eliminate dust, erosion control, erosion control material, erosion control product, erosion prevention, fines preservation, fugitive dust control, hydromulch tackifier, hydroseed tackifier, inhibit dust, mitigate dust, pm10 control, pm2.5 control, prevent dust, reduce dust, retard dust, road stabilization, road stabilizer, sand stabilization, soil additive, soil amendment, soil binder, soil crusting agent, soil solidifier, soil stabilization, soil stabilizer, stabilize dust, stabilize soil, stockpile capping, stop dust, suppress dust, surface wear course, wind erosion control.

SECTION 2 – HAZARDS IDENTIFICATION

Emergency Overview

Appearance:	Milky white liquid (transparent once cured)
Odor:	Sweet and mild (no odor once cured)
Health Hazards:	Under normal conditions of industrial use, this material is NOT expected to be a primary route of exposure
Safety Hazards:	Nonflammable
Environmental Hazards:	NOT classified as dangerous for the environment

HEALTH HAZARDS

INHALATION	Under normal conditions of industrial use, this material is NOT expected to be a primary route of exposure.
SKIN CONTACT	Under normal conditions of industrial use, this material is NOT expected to be a primary route of exposure.
EYE CONTACT	Under normal conditions of industrial use, this material is NOT expected to be a primary route of exposure.
INGESTION	Under normal conditions of industrial use, this material is NOT expected to be a primary route of exposure.

GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS (GHS)

Not a hazardous substance or mixture.

U.S. HAZARDOUS MATERIALS IDENTIFICATION SYSTEM (HMIS) RATING

Health	0	No significant risk to health
Flammability	0	Material will not burn
Physical Hazard	0	Stable, non-reactive and non-explosive
Personal Protection	-	No special hazard under normal use

SECTION 3 – COMPOSITION/ INFORMATION ON INGREDIENTS

This material does NOT contain hazardous ingredients and is NOT considered hazardous according to OSHA criteria.

#	COMPONENT	%	CAS Number
1.	Synthetic Vinyl Copolymer Dispersion	55%	Non-Hazardous
2.	Water	45%	7732-18-5

BYPRODUCT / RECYCLED CONTENT

None

SECTION 4 – FIRST-AID MEASURES

Provide medical care provider with this Safety Data Sheet.

EYE CONTACT

If irritation or redness develops from exposure, flush eyes with clean water. If irritation persists, seek medical attention.

SKIN CONTACT

No treatment necessary under normal conditions of use. Remove contaminated clothing. Wash affected area with mild soap and water. If irritation or redness develops and persists, seek medical attention.

INHALATION

No treatment necessary under normal conditions of use. If breathing difficulties develop move victim away from source of exposure and into fresh air in a position comfortable for breathing. If symptoms persist, seek medical attention.

INGESTION

If swallowed do not induce vomiting. If symptoms persist, seek medical attention.

SECTION 5 – FIRE-FIGHTING MEASURES**FLAMMABILITY**

Nonflammable and NOT combustible.
This material is an aqueous mixture that will not burn.
Dried material will burn in a fire.

FLASH POINT

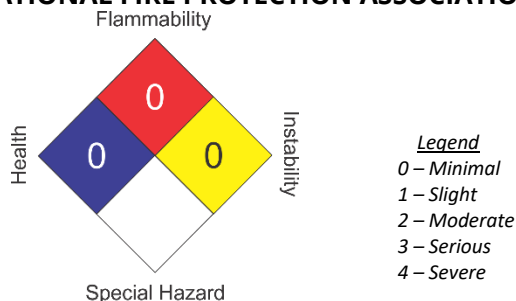
Nonflammable

EXTINGUISHING MEDIA

Use water spray, foam, dry chemical or carbon dioxide.

SPECIAL FIRE FIGHTING PROCEDURES & PROTECTIVE EQUIPMENT

Cool closed containers exposed to fire with water spray. Proper protective equipment including breathing apparatus must be worn when approaching a fire in a confined space.

U.S. NATIONAL FIRE PROTECTION ASSOCIATION (NFPA) 704 HAZARD CLASS**SECTION 6 – ACCIDENTAL RELEASE MEASURES**

For guidance on selection of personal protective equipment see Chapter 8 of this Safety Data Sheet. See Chapter 13 for information on disposal. Observe the relevant local and international regulations.

PROTECTIVE MEASURES

Stop the leak, if possible. Avoid contact with skin and eyes. Use appropriate containment to avoid environmental contamination. Prevent from spreading or entering drains, ditches, sewers, rivers or open bodies of water by using sand, earth or other appropriate barriers.

CLEAN-UP METHODS

Avoid accidents, clean up immediately. Slippery when spilled. Prevent from spreading by making a barrier with sand, earth or other containment material. Reclaim liquid directly or in an absorbent. Soak up residue with an absorbent such as clay, sand or other suitable material and dispose of properly.

ADDITIONAL ADVICE

Local authorities should be advised if significant spillages cannot be contained.

SECTION 7 - HANDLING AND STORAGE

GENERAL PRECAUTIONS

Use local exhaust ventilation if there is risk of inhalation of vapors, mists or aerosols. Use the information in this data sheet as input to a risk assessment of local circumstances to help determine appropriate controls for safe handling, storage and disposal of this material.

STORAGE

Keep container tightly closed in a cool, well-ventilated place. Use properly labelled and closeable containers. Maintain storage temperature $\geq 40^{\circ}\text{F}$ (4°C) to avoid freezing and destabilization. Ideal storage temperature is 72°F (22°C).

HANDLING

Avoid breathing vapors or mist. Avoid contact with eyes. Avoid prolonged or repeated contact with skin. Wash thoroughly after handling. When handling material in drums, safety footwear should be worn and proper handling equipment should be used.

RECOMMENDED MATERIALS

For containers or container linings, use mild steel or high density polyethylene.

ADDITIONAL INFORMATION

Do not freeze.

SECTION 8 – EXPOSURE CONTROLS / PERSONAL PROTECTION

OCCUPATIONAL EXPOSURE LIMITS

Contains no substances with occupational exposure limit values.

EXPOSURE CONTROLS

The level of protection and types of controls necessary will vary depending upon potential exposure conditions. Select controls based on a risk assessment of local circumstances. Appropriate measures include: Adequate ventilation to control airborne concentrations. Where material is heated, sprayed or mist formed, there is greater potential for airborne concentrations to be generated.

PERSONAL PROTECTIVE EQUIPMENT

Personal protective equipment (PPE) should meet recommended national standards. Check with PPE suppliers.

RESPIRATORY PROTECTION

Respiratory protection is NOT required under normal conditions of use in a well-ventilated workplace. In accordance with good industrial hygiene practices, precautions should be taken to avoid breathing of material. If engineering controls do not maintain airborne concentrations to a level which is adequate to protect worker health, select respiratory protection equipment suitable for the specific conditions of use and meeting relevant legislation. Check with respiratory protective equipment suppliers. Where air-filtering respirators are suitable, select an appropriate combination of mask and filter. Select a filter suitable for combined particulate/organic gases and vapors.

HAND PROTECTION

Where hand contact with the material may occur the use of gloves approved to relevant standards (e.g. Europe: EN374, US: F739) made from the following materials may provide suitable chemical protection: PVC, neoprene or nitrile rubber gloves. Suitability and durability of a glove is dependent on usage, e.g. frequency and duration of contact, chemical resistance of glove material, glove thickness, dexterity. Always seek advice from glove suppliers. Contaminated gloves should be replaced. Personal hygiene is a key element of effective hand care. Gloves must only be worn on clean hands. After using gloves, hands should be washed with soap and water and dried thoroughly.

EYE PROTECTION

Eye protection is NOT required under normal conditions of use. If material is handled such that it could be splashed into eyes, wear splash-proof safety goggles or full face shield.

PROTECTIVE CLOTHING

Skin protection is NOT required under normal conditions of use or for single, short duration exposures. For prolonged or repeated exposures, use impervious chemical resistant boots, gloves and/or aprons over parts of the body subject to exposure.

MONITORING METHODS

Monitoring of the concentration of substances in the breathing zone of workers or in the general workplace may be required to confirm compliance with an OEL and adequacy of exposure controls.

SECTION 9 – PHYSICAL AND CHEMICAL PROPERTIES

BOILING POINT	>212 °F (>100 °C)
COLOR	Milky white (transparent once cured)
DENSITY	8.85-9.15 lb./gal (1.06-1.1 kg/l)
DYNAMIC VISCOSITY	290 cP @ 140 °F (60 °C)
DYNAMIC VISCOSITY	420 cP @ 104 °F (40 °C)
EVAPORATION RATE	<1 (BuAc = 1)
FLASH POINT	Nonflammable
FREEZING POINT	<32 °F (<0 °C)
ODOR	Sweet and mild (no odor once cured)
PH	5
PHYSICAL FORM	Liquid
SPECIFIC GRAVITY	1.05-1.10
VAPOR DENSITY	>1 (Air = 1)
WATER SOLUBILITY	100% dispersible, completely (until cured)

SECTION 10- STABILITY AND REACTIVITY

CHEMICAL STABILITY

Stable. Coagulation may occur following freezing, thawing or boiling.

Stability at 72 °F (22 °C) is ≥12 months.

CONDITIONS TO AVOID

Freezing (until cured).

HAZARDOUS REACTIONS

Hazardous polymerization does not occur.

HAZARDOUS DECOMPOSITION

Hazardous decomposition products are NOT expected to form during normal storage.

CORROSIVITY

Non-corrosive.

SECTION 11 - TOXICOLOGICAL INFORMATION

CARCINOGENICITY

Components $\geq 0.1\%$ are NOT known to be associated with carcinogenic effects.

ACGIH	American Conference of Governmental Industrial Hygienists	Not listed as carcinogenic
IARC	World Health Organization International Agency for Research on Cancer	Not listed as carcinogenic
NTP	U.S. National Toxicology Program	Not listed as carcinogenic
OSHA	U.S. Occupational Safety and Health Administration	Not listed as carcinogenic
Prop 65	California Office of Environmental Health Hazard Assessment Proposition 65	Not listed as carcinogenic

REPRODUCTIVE AND DEVELOPMENTAL TOXICITY

NOT expected to be a hazard.

DIOXINS & FURANS (PCDD's / PCDF's)

None Detected – QC066-97, GC-MS

METALS

None Detected – EPA 6020 & 3050

POLYCHLORINATED BIPHENYL (PCBs) AROCLORS

None Detected – EPA 8082

POLYCYCLIC AROMATIC HYDROCARBONS (PAH's)

None Detected – EPA 3510, GC-MS

SEMI-VOLATILE ORGANIC COMPOUNDS (SVOC)

None Detected – EPA 8270, GC-MS

VOLATILE ORGANIC COMPOUNDS

None Detected – EPA 8260, GC-MS

SECTION 12 - ECOLOGICAL INFORMATION

Based on EPA guidelines, this material is classified as practically non-toxic to all species. When used and applied properly, this material is not known to pose any ecological problems.

AQUATIC TOXICITY

Bacterium	Aliivibrio fischeri	15 minute	IC ₅₀	>6,200 mg/L
Fathead Minnow	Pimephales promelas	7 day	IC ₅₀	>95,000 mg/L
Fathead Minnow	Pimephales promelas	7 day	LC ₅₀	>240,000 mg/L
Fathead Minnow	Pimephales promelas	96 hour	LC ₅₀	>1,200 mg/L
Microalga	Pseudokirchneriella subcapitata	96 hour	IC ₅₀	>250,000 mg/L
Microalga	Pseudokirchneriella subcapitata	96 hour	LC ₅₀	>1,000 mg/L
Rainbow Trout	Oncorhynchus mykiss	96 hour	LC ₅₀	>1,000 mg/L
Water Flea	Daphnia magna	48 hour	LC ₅₀	>175,000 mg/L

TERRESTRIAL TOXICITY

Earthworm	Eisenia andrei	14 day	LC ₅₀	>1,000,000 mg/L
Lettuce	Root elongation	120 hour	EC ₅₀	>1,000,000 mg/L
Lettuce	Seed germination	120 hour	LC ₅₀	>1,000,000 mg/L

OTHER ADVERSE EFFECTS

The material contains non-volatile components, which are NOT expected to be released to air in any significant quantities. The material is NOT expected to have ozone depletion potential, photochemical ozone creation potential or global warming potential.

SECTION 13 - DISPOSAL CONSIDERATIONS

MATERIAL DISPOSAL

Recover or recycle if possible. Do NOT dispose into the environment, in drains or in water courses. To the best of our knowledge, this material does not meet the definition of hazardous waste under the U.S. EPA Hazardous Waste Regulations 40 CFR 261. Solidify and dispose of in an approved landfill. It is the responsibility of the waste generator to determine the toxicity and physical properties of the material generated to determine the proper waste classification and disposal methods in compliance with applicable regulations.

CONTAINER DISPOSAL

Dispose in accordance with prevailing regulations, preferably to a recognized collector or contractor. The competence of the collector or contractor should be established beforehand.

LOCAL LEGISLATION

Dispose in accordance with applicable regional, national and local laws and regulations.

SECTION 14 - TRANSPORT INFORMATION

NOT dangerous goods.

U.S. DEPARTMENT OF TRANSPORTATION (DOT)

NOT regulated. This material is NOT subject to DOT regulations under 49 CFR Parts 171-180.

INTERNATIONAL MARITIME DANGEROUS GOODS (IMDG)

NOT regulated. This material is NOT classified as dangerous under IMDG regulations.

INTERNATIONAL AIR TRANSPORT ASSOCIATION (IATA)

NOT regulated. This material is either NOT classified as dangerous under IATA regulations or needs to follow country specific requirements.

SECTION 15 - REGULATORY INFORMATION

The regulatory information is not intended to be comprehensive. Other regulations may apply to this material.

U.S. FEDERAL REGULATIONS**EPA COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT (CERCLA)**

This material does NOT contain any chemicals with U.S. EPA CERCLA reportable quantities.

EPA SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT (SARA)

This material does NOT contain any chemicals with SARA reportable quantities.

EPA TOXIC SUBSTANCES CONTROL ACT (TSCA)

All components listed or in compliance with the inventory.

EPA CERCLA/SARA SECTION 302 EXTREMELY HAZARDOUS SUBSTANCES AND TPQS

This material does NOT contain any chemicals subject to the reporting requirements of SARA 302 and 40 CFR 372.

EPA CERCLA/SARA SECTION 311/312 (TITLE III HAZARD CATEGORIES)

Acute Health:	No
Chronic Health:	No
Fire Hazard:	No
Pressure Hazard:	No
Reactive Hazard:	No

EPA CERCLA/SARA SECTION 313 AND 40 CFR 372

This material does NOT contain any chemicals subject to the reporting requirements of SARA 313 and 40 CFR 372.

CLEAN AIR ACT (CAA)

This material does NOT contain any hazardous air pollutants (HAP, as defined by the CAA Section 12 (40 CFR 61).

U.S. STATE REGULATIONS

CALIFORNIA SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT (PROPOSITION 65)

This material does NOT contain any chemicals known to the State of California to cause cancer, birth defects or reproductive harm.

CANADIAN REGULATIONS

This material has been classified in accordance with the hazard criteria of the Controlled Products Regulations (CPR) and the SDS contains all the information required by the regulations.

CANADIAN DOMESTIC SUBSTANCES LIST (DSL)

All components listed or in compliance with the inventory.

WORKPLACE HAZARDOUS MATERIALS INFORMATION SYSTEM (WHIMIS)

None. This material is NOT a controlled material under the Canadian WHIMIS.

BUREAU DE NORMALIZATION DU QUÉBEC (BNQ)

Soiltac conformed as a dust control agent for non-asphalted roads and other similar surfaces.

Certificate of Conformity: 2014-08-06 – 2015-06-30

Certificate #: 1743

Standard #: BNQ 2410-300/2009-10-01

Certification Protocol #: BNQ 2410-900/2010-01-12

INVENTORY REGULATIONS

Australia	AICS	All components listed or in compliance with the inventory.
Canada	DSL/NDSL	All components listed or in compliance with the inventory.
China	IECSC	All components listed or in compliance with the inventory.
Japan	ENCS	All components listed or in compliance with the inventory.
Korea	KECI	All components listed or in compliance with the inventory.
Philippines	PICCS	All components listed or in compliance with the inventory.
United States	TSCA	All components listed or in compliance with the inventory.

INVENTORIES LEGEND

AICS	Australian Inventory of Chemical Substances
DSL	Canadian Domestic Substances List
ENCS	Japanese Existing and New Chemical Substances
IECSC	China Existing Chemical Inventory
KECI	Korea Existing Chemicals Inventory
NDSL	Canadian Non-Domestic Substances List
PICCS	Philippine Inventory of Chemicals and Chemical Substances
TSCA	Toxic Substances Control Act

SECTION 16 – OTHER INFORMATION

SDS VERSION NUMBER 1.2

SDS EFFECTIVE DATE 7/13/2015

SDS REGULATIONS

The content and format of this SDS is in accordance with the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

SDS DISTRIBUTION

The information in this document should be made available to all who may handle the material.

DISCLAIMER

The information presented in this Safety Data Sheet is based on data believed to be accurate as of the date this Safety Data Sheet was prepared. HOWEVER, NO WARRANTY OF MERCHANTABILITY, FITNESS FOR ANY PARTICULAR PURPOSE, OR ANY OTHER WARRANTY IS EXPRESSED OR IS TO BE IMPLIED REGARDING THE ACCURACY OR COMPLETENESS OF THE INFORMATION PROVIDED ABOVE, THE RESULTS TO BE OBTAINED FROM THE USE OF THIS INFORMATION OR THE MATERIAL, THE SAFETY OF THIS MATERIAL, OR THE HAZARDS RELATED TO ITS USE. No responsibility is assumed for any damage or injury resulting from abnormal use or from any failure to adhere to recommended practices. The information provided above, and the material, are furnished on the condition that the person receiving them shall make their own determination as to the suitability of the material for their particular purpose and on the condition that they assume the risk of their use. In addition, no authorization is given nor implied to practice any patented invention without a license.