
**CHAPTER 5
EFFECTS FOUND NOT TO BE SIGNIFICANT**

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CHAPTER 5

EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the CEQA Guidelines requires that an EIR briefly describe potential environmental effects that were determined not to be significant and therefore were not discussed in detail in the EIR. The environmental issues discussed in the following sections are not considered significant, and the reasons for the conclusion of non-significance are subsequently discussed. Because the proposed single cell design and split cell design option for the proposed East Highline Reservoir and Intake Channel Project (Proposed Project or Project) are proposed in the same location and are similar in all ways save for a slightly lower water volume to the latter, the evaluation provided below is applicable to both options.

No comments were received in response to the Notice of Preparation (NOP) with concerns regarding impacts on geology and soils, mineral resources, population and housing, public services, recreation, transportation and traffic, or utilities and service systems. During the NOP comment period, the IID received a comment letter with concerns about the Proposed Project's compliance with aesthetics and with the underlying land use and zoning. These topics were subsequently evaluated in the EIR (see Sections 4.1, Aesthetics, and 4.7, Land Use and Planning).

5.1 AGRICULTURAL AND FORESTRY RESOURCES

The project area is made up of tracts of agricultural land, located on prime farmland and farmland of statewide importance (DOC 2014). The project would develop a main canal off-line reservoir and related infrastructure on land currently being used for agriculture. The project site is on land owned by the IID and a small portion of the intake channel traverses federal land withdrawn to Reclamation. However, the Proposed Project would provide similar uses to those expressly allowed by Imperial County (County) land use regulations and would be supportive of agricultural practices because it would manage the water delivery for agricultural use, supplying surrounding and downstream agricultural uses with a stable water supply. The Proposed Project would not convert farmlands to non-agricultural uses. The Proposed Project site is not located on a Williamson Act contract, therefore no impact would occur (DOC 2013). The Proposed Project site is not located on forest land, timberland, or timberland production land as defined in California Public Resources Code Sections 12220(g), 4526, and 51104(g), nor would it result in the loss of forest land. As such, impacts to agricultural and forestry resources would be less than significant.

5.2 ENERGY

Appendix F (Energy Conservation) of the CEQA Guidelines provides that potentially significant energy implications of a project must be considered in an EIR, with particular emphasis on avoiding or reducing the inefficient, wasteful, and unnecessary consumption of energy. As such, this discussion

considers the Proposed Project's consumption of energy resources, particularly electricity, natural gas, and transportation fuels, during both the project's construction and operational phases.

The physical environmental impacts associated with the generation of electricity were evaluated in Sections 4.2, Air Quality; 5.4, Greenhouse Gas Emissions; and 5.10, Utilities and Service Systems, of this EIR.

Construction of the Proposed Project is expected to last approximately 15 months to complete. Construction activities would consume energy through the operation of off-road equipment, trucks, and worker trips. The off-road equipment, as summarized in Section 4.2, would use diesel fuel during each phase of project construction. The minimum requirement to meet Toxics-Best Available Control Technology (Toxics-BACT) standards is for construction fleets to be comprised of 10% Tier 2 and Tier 3 equipment. Based on the analysis given in the Air Quality Impact Report, construction fleets used for the project would be comprised mainly of Tier 2 and Tier 3 equipment, and would therefore meet the Toxics-BACT standards, and lead to an improved efficiency for use of fuel. California regulations (CCR Title 13, Sections 2449(d)(3) and 2485) limit idling from both on-road and off-road diesel-powered equipment and are enforced by the Air Resources Board (ARB). Despite the increase in energy demand, primarily related to fuel use, during construction, project construction equipment requirements, combined with local, state, and federal regulations, which limit engine idling times and require recycling of construction debris, would reduce short-term energy demand due to project construction. Therefore, it is anticipated that the construction phase would not result in a wasteful or inefficient use of energy, and the Proposed Project's impact on the wasteful and inefficient use of nonrenewable resources during construction of the project would be less than significant.

Long-term operational energy use associated with the project includes the storage of approximately 2,500 to 3,400 acre-feet of water in the proposed reservoir. The proposed reservoir is anticipated to receive water by gravity flow only (i.e., no pumping) from an intake structure off the north side of the AAC. Water that is stored for a later operational delivery from the proposed reservoir would be delivered through an automated gate outlet and structure with a gravity flow capacity of approximately 1,500 cubic feet per second for delivery into the EHL Canal. The outlet gate would be controlled by a remote operated automated mechanism. The electricity used to operate the automated outlet gate would be minimal, considering IID supplies electricity to more than 150,000 customers in the Imperial Valley and parts of Riverside and San Diego Counties (IID 2018). As the sixth-largest utility in California, IID controls more than 1,100 megawatts of energy derived from a diverse resource portfolio that includes its own generation as well as long- and short-term power purchases. IID has met or exceeded all Renewables Portfolio Standard requirements to date, procuring renewable energy from diverse sources, including biomass, biowaste, geothermal, hydroelectric, solar, and wind (IID 2018). Therefore, the energy required to operate the Proposed Project would be minimal compared to the overall, energy generated for the

rest of IID's jurisdiction. As such, impacts would be less than significant with regard to consumption of energy.

Therefore, the Proposed Project would be developed in accordance with Appendix F of the CEQA Guidelines, and would meet the goals of energy conservation by decreasing overall per capita energy consumption, decreasing reliance on natural gas and oil, and increasing reliance on renewable energy sources. Energy consumption associated with operation of the project would not be expected to be wasteful or inefficient. Therefore, the project's operational impacts relating to energy consumption would be less than significant.

5.3 GEOLOGY AND SOILS

The Alquist-Priolo Earthquake Fault Zoning Act identifies no active faults within the Bonds Corner Quadrangle within Imperial County. Consequently, the risk of surface rupture is low. Ground-shaking hazards associated with construction of the proposed reservoir and intake channel would be avoided through project design features in accordance with the USACE and Reclamation regulations on waterways. Additionally, ground-shaking hazards during construction of the proposed reservoir and intake channel would be avoided through project design features in accordance with the Uniform Building Code. The Proposed Project would implement structural design measures that reduce liquefaction risk. Therefore, impacts associated with liquefaction are expected to be less than significant, due to the generally flat topography of the project area, the Proposed Project is not anticipated to be susceptible to landslides and would be constructed in accordance with approval requirements of Reclamation. Construction activities for the Proposed Project, including the proposed reservoir, EHL Canal connection, and the intake route to the AAC, would not be at risk of causing landslides. Compliance with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit would be necessary, as well as preparation of a stormwater pollution prevention plan (SWPPP) that would minimize or eliminate the potential soil erosion that could result from construction. The site has previously been developed and disturbed, and there are no known cases of landslide, lateral spreading, subsidence, liquefaction, or collapse occurring on site. Additionally, the Proposed Project would not be approved or built without compliance with the California Building Code and applicable geologic hazards regulations. Due to the generally flat topography of the project area, the Proposed Project is not anticipated to be susceptible to landslides and would be constructed in accordance with approval requirements of Reclamation.

According to USDA's Web Soil Survey, the project site is located on predominantly Rositas fine sand; other soils include Rositas sand, Meloland and Holtville loams, Meloland very fine sandy loam, and Holtville silty clay (USDA 2019), as shown on Figure 5-1, Soils. These soils are predominantly considered well to moderately well drained. Prior to construction, a geotechnical report recommendations would be prepared to assess the Proposed Project's susceptibility to landslides, lateral spreading, subsidence, liquefaction, or collapse. Geotechnical recommendations would be

implemented as a part of the project design and construction plans to protect the project from landslides, lateral spreading, subsidence, liquefaction, and collapse. Therefore, by preparing a geotechnical report and complying with the California Building Code and other applicable geologic regulations, impacts to geology and soils are expected to be less than significant.

Operations of the Proposed Project would include an unstaffed operational reservoir and intake channel. No groundbreaking activities would result during operations of the Proposed Project. Therefore, no impact would occur during operations.

5.4 GREENHOUSE GAS EMISSIONS

An Air Quality and Greenhouse Gas Emissions Assessment Technical Memorandum was prepared by Dudek in April 2019, and is included in this EIR as Appendix B. The memorandum estimates criteria air pollutant and greenhouse gas (GHG) emissions from construction of the Proposed Project and evaluates potential air quality and GHG emissions impacts resulting from project construction. The estimated commencement date for project construction is anticipated to occur at a later date compared to the construction schedule assumed at the time of modeling included in Appendix B. However, for the purposes of construction modeling, the models do not need to use the exact commencement and completion dates to accurately represent the project construction emissions. This is because state and local regulations, restrictions, and increased market penetration of cleaner construction equipment are anticipated to continue to reduce emissions in the future. In other words, because California's construction-related emission sources are regulated and will foreseeably continue to be more strictly regulated in the future, project emissions are reasonably expected to continue to decline. Thus, by utilizing an earlier start date of October 2018, the estimated emissions used in the analysis for this EIR likely overstate actual emission levels. Therefore, the analysis and modeling included herein continue to provide an accurate and conservative assessment of the project's construction-related air pollutant emissions.

Construction of the reservoir would occur over an approximately 15-month construction period and involve the following components: construction of the reservoir; canal and measurement flume; sedimentation basin; construction of the SR- 98 crossing, Holdridge Road realignment, canal inlet structure, reservoir outlet gate, meter vault, and EHL Canal outfall structure; construction of the AAC and EHL Canal tie-ins; and construction of the SR-98 detour roadway.

5.4.1 Construction Emissions

Construction of the project would result in GHG emissions, which are primarily associated with use of off-road construction equipment, on-road vendor and haul trucks, and worker vehicles. The Imperial County APCD does not have adopted GHG thresholds; however, total construction emissions of the Proposed Project were calculated.

The California Emissions Estimator Model (CalEEMod) was used to calculate the annual GHG emissions based on the construction scenario described in Attachment A of Appendix B. Construction of the Proposed Project is anticipated to commence in October 2019, lasting a total of approximately 15 months. However, the analysis presented herein assumes a construction start date of October 2018, which was the original earliest date at which construction would initiate per the project's preliminary construction schedule. On-site sources of GHG emissions include off-road equipment and off-site sources include on-road vehicles (haul trucks, vendor trucks, and worker vehicles). Table 5-1 presents construction GHG emissions for the Proposed Project from on-site and off-site emission sources.

Table 5-1
Estimated Annual Construction GHG Emissions

Project Component	CO ₂	CH ₄	N ₂ O	CO ₂ e
	Metric Tons Per Year			
<i>Modelling Year 2018</i>				
Reservoir	99.78	0.03	0.00	100.50
SR-98 Detour	46.79	0.01	0.00	47.14
Canal Tie-Ins	50.92	0.01	0.00	51.17
Sedimentation Basin	300.46	0.06	0.00	301.91
Canal and Measurement Flumes	220.69	0.03	0.00	221.53
<i>Modelling Year 2019</i>				
Reservoir	506.24	0.11	0.00	509.02
Canal Tie-Ins	38.65	0.00	0.00	38.75
Structures	282.13	0.05	0.00	283.43
Total	1,545.66	0.30	0.00	1,553.45

Notes: GHG = greenhouse gas; CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO₂e = carbon dioxide equivalent; SR = State Route. See Attachment A to Appendix B for complete results.

As shown in Table 5-1, the estimated total GHG emissions during construction would be approximately 1,553 metric tons (MT) MT carbon dioxide equivalent (CO₂e) over the entire construction period. As with project-generated construction air quality pollutant emissions, GHG emissions generated during construction of the Proposed Project would be short term in nature, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions.

To evaluate whether a project's construction GHG emissions are cumulatively considerable, ICAPCD recommends that projects be assessed based on whether a project would conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

The Proposed Project would not conflict with the state's trajectory toward future GHG reductions. Furthermore, construction activities would occur over a short duration of approximately 15 months and would cease once construction is completed. Per guidance from the South Coast Air Quality

Management District (SCAQMD 2008), construction emissions are typically amortized over a 30-year period) to account for the contribution of construction emissions over the lifetime of a project. Thresholds have been proposed by various agencies and air districts including both the Bay Area Air Quality Management District and the SCQGM. The Bay Area and South Coast Air Quality Management Districts have each developed significance thresholds of 1,100 MT CO₂e and 3,000 MT CO₂e per year. The Proposed Project would result in amortized construction emissions of approximately 52 MT CO₂e per year, which is substantially less than these thresholds. Based on the preceding considerations, the Proposed Project's construction GHG emissions are not cumulatively considerable and are considered less than significant.

Applicable Plans, Policies, or Regulations

Imperial County has not adopted a comprehensive climate action plan or an equivalent GHG reduction plan and there is currently no local guidance that would be applicable to the Proposed Project. At this time, no mandatory GHG plans, policies, or regulations or finalized agency guidelines would apply to the construction of the Proposed Project, thus no conflict would occur.

Consistency with the CARB Scoping Plan

The Climate Change Scoping Plan, approved by California Air Resources Board (CARB) in 2008 and updated in 2014 and 2017, provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. As such, the Scoping Plan is not directly applicable to specific projects. Moreover, the Final Statement of Reasons for the amendments to the CEQA Guidelines reiterates the statement in the Initial Statement of Reasons that "[t]he Scoping Plan may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan" (CNRA 2009). Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-GWP GHGs in consumer products) and changes to the vehicle fleet (hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard), among others. While state regulatory measures would ultimately reduce GHG emissions associated with the Proposed Project through their effect on these sources, no statewide plan, policy, or regulation would be specifically applicable to reductions in GHG emissions from the Proposed Project.

Consistency with the SCAG 2016–2040 RTP/SCS

At the regional level, SCAG has adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for the purpose of reducing GHG emissions attributable to

passenger vehicles in Imperial County and surrounding areas. The RTP/SCS quantified an 8% reduction in emissions per capita by 2020, an 18% reduction by 2035, and a 21% reduction by 2040 (SCAG 2016). Although the RTP/SCS does not regulate land use or supersede the exercise of land use authority by SCAG's member jurisdictions (i.e., Imperial County), the RTP/SCS is a relevant regional reference document for purposes of evaluating the connection of land use and transportation patterns and the corresponding GHG emissions. The RTP/SCS is not directly applicable to the Proposed Project because the underlying purpose of the RTP/SCS is to provide direction and guidance on future regional growth (i.e., the location of new residential and non-residential land uses) and transportation patterns throughout the region, as stipulated under Senate Bill 375. The Proposed Project involves construction of a reservoir and associated infrastructure, which entails short-term use of construction equipment and worker vehicle trips. As such, the Proposed Project would not conflict with the goals and policies of the RTP/SCS.

Consistency with Executive Order S-3-05

This executive order establishes the following goals: GHG emissions should be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80% below 1990 levels by 2050.

Consistency with Senate Bill 32

Senate Bill 32 establishes a statewide GHG emissions reduction target whereby CARB, in adopting rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions, shall ensure that statewide GHG emissions are reduced to at least 40% below 1990 levels by December 31, 2030.

The CARB has expressed optimism with regard to both the 2030 and 2050 goals. It states in the Scoping Plan First Update that "California is on track to meet the near-term 2020 GHG emissions limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32" (CARB 2014). With regard to the 2050 target for reducing GHG emissions to 80% below 1990 levels, the Scoping Plan First Update (CARB 2014) states the following:

This level of reduction is achievable in California. In fact, if California realizes the expected benefits of existing policy goals (such as 12,000 megawatts of renewable distributed generation by 2020, net zero energy homes after 2020, existing building retrofits under AB 758, and others) it could reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80% below 1990 levels by 2050. Additional measures, including locally driven measures and those necessary to meet federal air quality standards in 2032, could lead to even greater emission reductions.

In other words, CARB believes that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in AB 32, Senate Bill 32, and Executive Order S-3-05. This is confirmed in the Second Update, which states, “[t]his Plan draws from the experiences in developing and implementing previous plans to present a path to reaching California’s 2030 GHG reduction target. The Plan is a package of economically viable and technologically feasible actions to not just keep California on track to achieve its 2030 target, but stay on track for a low- to zero-carbon economy by involving every part of the state” (CARB 2017). The Second Update also states that although “the Scoping Plan charts the path to achieving the 2030 GHG emissions reduction target, we also need momentum to propel us to the 2050 statewide GHG target (80% below 1990 levels). In developing this Scoping Plan, we considered what policies are needed to meet our mid-term and long-term goals” (CARB 2017).

The Proposed Project would not interfere with implementation of the previously described GHG reduction goals for 2030 or 2050, because the Proposed Project’s GHG emissions would cease after construction activities have been completed. Therefore, the Proposed Project would not conflict with the state’s trajectory toward future GHG reductions, and the Proposed Project’s impacts on GHG emissions in the 2030 and 2050 horizon years would be considered less than significant.

Based on the discussion above, the Proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Furthermore, the Proposed Project would thus not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions, and impacts would be less than significant.

5.4.2 Operational Emissions

Once operational, the project would consist of a single cell reservoir facility (or split cell design option within same project footprint), covering approximately 370 acres, which would manage up to approximately 3,400 acre-feet of water. Once constructed, the reservoir and associated infrastructure would not have any components that emit GHG emissions. The Proposed Project’s GHG emissions would cease after construction activities have been completed and once operational would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Further, operations of the Proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Therefore, operational impacts are considered less than significant.

5.5 MINERAL RESOURCES

There are no anticipated known mineral resources within the project site, and no evidence exists indicating that there could be mineral resources in the project vicinity (County of Imperial 2016). Furthermore, the project site is not designated as a locally important mineral resource recovery site in the Conservation and Open Space Element of the County of Imperial General Plan. There would

be no loss of availability of a known mineral resource of value to the region due to construction and operation of the project. Therefore, no significant impacts to mineral resources would occur, and additional analysis is unnecessary.

5.6 POPULATION AND HOUSING

For purposes of evaluating worst-case environmental impacts, it is assumed that a total of approximately 100 construction workers, all of whom could be on site on a single given day, would be employed during construction of the Proposed Project. It is anticipated that these new jobs would be filled by the existing residential population in the greater Imperial County area. Therefore, the Proposed Project would not generate substantial population growth. The project would not remove an impediment to growth to the surrounding area by removing infrastructure limitations. The Proposed Project would not result in the demolition of housing, which would necessitate replacement housing to be constructed elsewhere. Further, the project would not result in substantial displacement of people, because no aspect of the project would result in the demolition of housing. As such, no significant impacts to population and housing would occur, and additional analysis is unnecessary.

5.7 PUBLIC SERVICES

The Proposed Project would not introduce any people or residences to the area. For purposes of evaluating worst-case environmental impacts, it is assumed that a total of 100 construction workers, all of whom could be on site on a single given day, would be employed during construction of the Proposed Project. It is anticipated that these new jobs would be filled by the existing residential population in the greater Imperial County area. Therefore, the Proposed Project would not generate substantial population growth. Construction activities may result in an increased need for fire and police protection in the area due to the increase in personnel at the project site for construction. However, compliance with local, state, and federal fire regulations and well as traffic and building regulations during construction activities would minimize the need for fire protection and police services. Schools, parks, and other public facilities in the area would not be adversely affected by the Proposed Project, and impacts would be less than significant. No additional analysis is necessary.

5.8 RECREATION

For purposes of evaluating worst-case environmental impacts, it is assumed that a total of 100 construction workers, all of whom could be on site on a single given day, would be employed during construction of the Proposed Project. It is anticipated that these new jobs would be filled by the existing residential population in the greater Imperial County area. Therefore, the Proposed Project would not generate substantial population growth. The Proposed Project would not introduce a new population to the area, and thus would not increase the use of existing neighborhoods, regional parks, or other

recreational facilities. Additionally, the Proposed Project does not include any recreational facilities. As such, impacts would be less than significant and no additional analysis is necessary.

5.9 TRANSPORTATION AND TRAFFIC

The proposed driveway is not anticipated to affect existing traffic, because existing traffic volumes in the vicinity are so low and the project does not include any off-site roadway improvements. Operations of the Proposed Project would be unstaffed, and therefore would not result in additional daily trips to the project site. The project would result in the partial abandonment and realignment of Holdridge Road, which is a County road through the proposed reservoir site and turns into a dirt road as it extends onto BLM lands. During construction, notice of the road closure and the detour would be posted, diverting potential drivers to SR-98 east to I-8 or west to Bonds Corner Road. An encroachment permit would be secured through Caltrans for proposed improvements within SR-98 right-of-way and for temporary detour route. Additionally, IID would secure an encroachment permit for Holdridge Road through the County of Imperial.

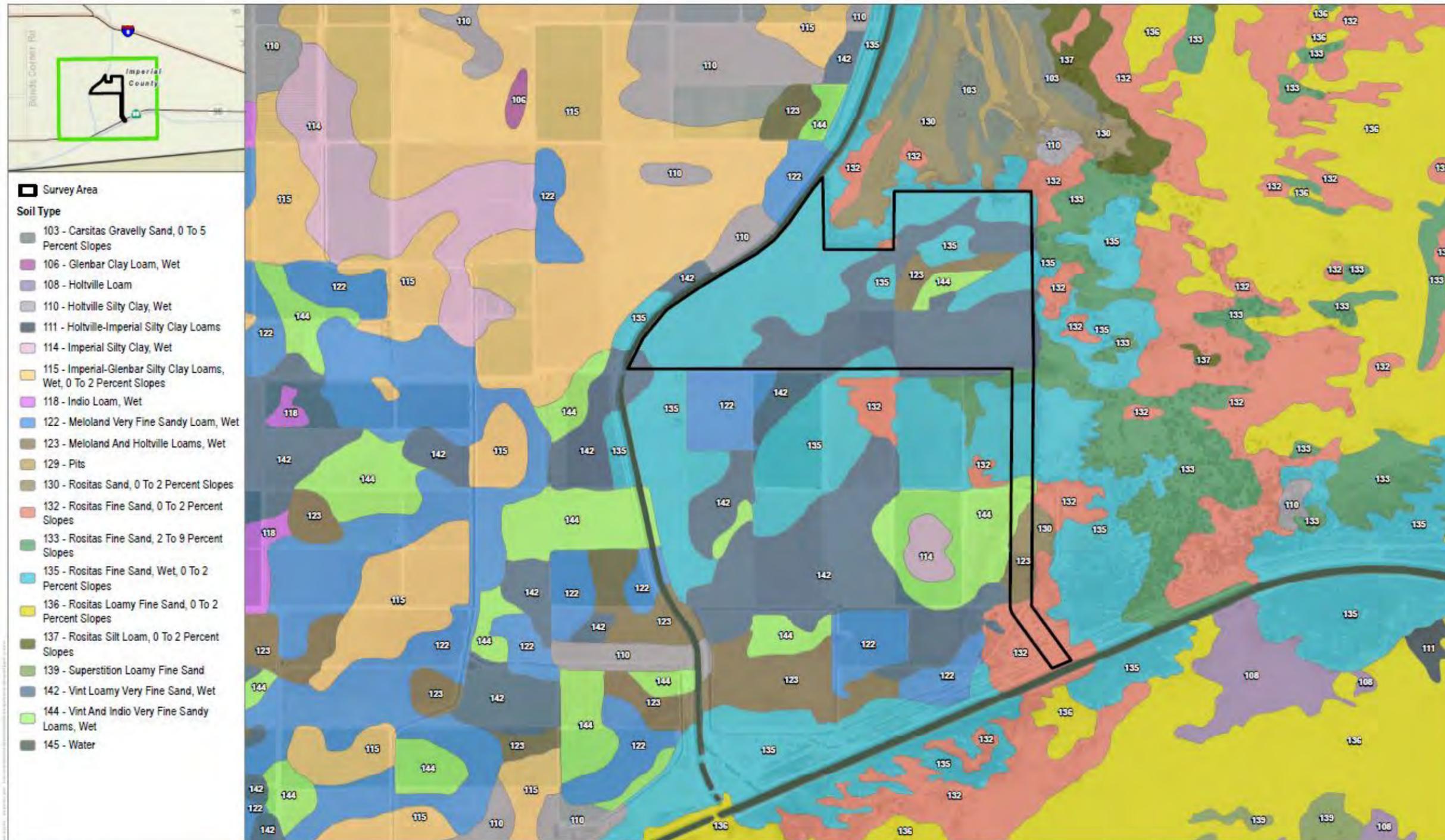
During activities to install the intake channel, a temporary partial closure of SR-98 lanes may be necessary, and a detour or traffic control would be implemented during that construction activity. The Proposed Project would be consistent with the goals and objectives of the Circulation and Scenic Highway Element as well as the Imperial County Long Range Transportation Plan 2013 Update, because the project would not result in population growth, new construction, or any other changes that would affect traffic (County of Imperial 2008). The Holtville Airport, which is 7.5 miles north of the site, does not have a Compatibility Map, but given the distance from the site and the relatively small size of the airport, no impacts would occur. The Proposed Project is not within Calexico International Airport Compatibility Map's range (Calexico International Airport 2017). As the project does not include any off-site roadway improvements, the project is not expected to result in hazards due to a design feature or incompatible use. No emergency access roads would be included in the Proposed Project, because the operation of facility would be unstaffed. Additionally, the Proposed Project would not block any existing circulation element roadways, including emergency access roads. As such, traffic impacts would be less than significant. No additional analysis is necessary.

5.10 UTILITIES AND SERVICE SYSTEMS

The project would not increase the amount of wastewater produced or increase the demands for water supplies in the area, because the Proposed Project would not introduce a new population to the area. Thus, the project would not increase the amount of wastewater produced in the area, nor would it exceed wastewater treatment requirements of the applicable RWQCB. The project would not require or result in the construction of new water, wastewater treatment, or stormwater drainage facilities or expansion of existing facilities. Construction waste would be taken to the Holtville Solid Waste

Services Landfill, which has the capacity for the anticipated construction waste. Operations of the project would not increase the generation of solid waste in the area and therefore would not increase demand on landfills. Additionally, disposal of solid waste generated during construction would comply with federal, state, and local statutes and regulations related to solid waste. Impacts related to utilities and service systems would be less than significant.

Figure 5-1 Soils



SOURCE: NAP 2016, USDA 2015



FIGURE 5-1
Soils

East Highline Reservoir and Intake Channel Project

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