CHAPTER 6
OTHER CEQA CONSIDERATIONS

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CHAPTER 6
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6.1 OVERVIEW

This chapter, as required by the CEQA Guidelines, presents discussions of the significant and unavoidable impacts, growth-inducing impacts, mandatory findings of significance, and cumulative impacts.

6.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

Section 15126.2(b) of the CEQA Guidelines requires an EIR to describe any significant impacts that cannot be mitigated or avoided through project alternatives to a less-than-significant level. All of the impacts associated with the proposed East Highline Reservoir and Intake Channel Project (Proposed Project) would be reduced to a less-than-significant level through implementation of **Mitigation Measure** (**MM) AQ-1** and **MM-AQ-2**, **MM-BIO-1** through **MM-BIO-10**, **MM-CR-1** through **MM-CR-4**, and **MM-HAZ-1** through **MM-HAZ-3**. As such, there would be no significant and unavoidable impacts.

6.3 GROWTH INDUCEMENT

Implementation of the proposed project would result in a single cell reservoir (or split cell design option), up to approximately 3,400 acre-feet capacity reservoir on agricultural land, in Imperial County (the County). As discussed in Section 5.6, Population and Housing, for purposes of evaluating the worst-case environmental impacts, it is assumed that up to 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.

According to the U.S. Bureau of Labor Statistics, Western Information Office, Imperial County has a civilian labor force of approximately 96,717, which is 52.9% of the total population in the County (USCB 2017). Therefore, the proposed project would represents a nominal increase in the labor force, and thus a nominal increase in economic growth. Additionally, project implementation would not remove barriers or obstacles to growth; the project would be developed on a site owned by IID, which is currently primarily used for agriculture. While the project would result in the construction of water infrastructure, these utilities would connect with existing infrastructure and would not induce growth. While the project would induce growth in relationship to the increased employment in the area, project implementation would not result in

substantial growth inducement above and beyond what has been considered in and planned for in regional and local planning documents.

6.4 CUMULATIVE

The CEQA Guidelines Section 15355 indicates that a cumulative impact refers to two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts. Section 15130 of the CEQA Guidelines requires that an EIR address cumulative impacts of a project when a project's incremental effect is cumulatively considerable, where "cumulatively considerable" means that the effects of an individual project are significant when added to the effects of past, present, and probable future projects, causing related effects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. A project's contribution is not considered cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact (14 CCR 15130(a)(3)).

The CEQA Guidelines further state that "an EIR should not discuss impacts which do not result in part from the project evaluated in the EIR" (14 CCR 15000 et seq.). This section provides a description of the related projects assessed for cumulative impacts when combined with the incremental impacts of the proposed project, the potential environmental impacts that relate to the proposed project, the status of the environmental review process for the related projects, and the potential cumulative impacts when the incremental contribution of the related projects is combined with the incremental impacts of the proposed project.

Section 6.4.1, Cumulative Projects, describes the projects considered in this cumulative impact analysis. It also describes each project's environmental status and the anticipated impacts of each project that could contribute to a cumulative impact when added to incremental impacts of the proposed project. Section 6.4.2, Cumulative Impacts, aggregates the potential cumulative impacts of the proposed project in conjunction with all of the projects considered in this analysis by resource area.

6.4.1 Cumulative Projects

Table 6-1 presents a summary of the six cumulative projects. This section provides a discussion of the effects that the proposed project may have on each environmental category of concern, such as air quality, biology, traffic, and noise. Consistent with CEQA, this discussion is guided by the standards of practicality and reasonableness. Cumulative projects are depicted on Figure 6-1, Cumulative Projects.

Table 6-1
Cumulative Projects List

Map ID No.	Project Title	Project Location	Project Description	Status
1	AAC Seepage Recovery Project	Southern side of the AAC between Drop 3 and Drop 4	The development of up to nine shallow surface water wells to recover surface water seeping from unlined portions of the AAC.	Under review.
2[a]	MWD/CVWD SWP Water Transfer and Exchange	N/A – statewide	An exchange between MWD and CVWD involving SWP entitlement and Colorado River water. CVWD would transfer 35,000 AF/year of its SWP entitlement to MWD. The delivery would be made to MWD at the existing Devil Canyon Afterbay.	Under review.
3	CA Ethanol & Power	4.5 miles south-southeast of the City of Brawley, on the north side of Keystone Road approximately 0.5 miles west of SR-111 and 2.5 miles east of SR-86	A sugarcane and sweet sorghum-to-ethanol, electricity, and bio-methane facility, and 41,000 acres of sugarcane supplemented by 33,000 acres of sweet sorghum. The operation will generate 49.9 MW of renewable electricity, 33.6 MW of which will be available for sale into the electrical grid on an annual basis. The facility will also produce 930 million cubic feet of bio-methane and 28,000 tons of inorganic fertilizer annually.	Final EIR submitted in August 2013.
4	Wistaria Ranch Solar Energy Center	6 miles southwest of the City of El Centro, south of I-8, east of Pulliam Road, and north of the AAC in southwestern unincorporated Imperial County	Up to 17 individual solar projects or clusters of multiple solar projects on 32 parcels, totaling approximately 2,793 acres.	Final EIR submitted in December 2014.
5	Iris Cluster Solar Farm Project	Approximately 2 miles west of Calexico, California	Solar farm on 1,400 acres in southern Imperial County.	Final EIR submitted in January 2015.
6	Big Rock Cluster Solar Farms Project	8 miles southwest of the City of El Centro and 3 miles south of Seeley	Construction of four utility-scale PV solar facilities on approximately 1,396 acres. The four projects would generate up to 325 MW.	Draft EIR submitted January 2018.

Notes: AAC = All-American Canal; MWD = Metropolitan Water District of Southern California; CVWD = Coachella Valley Water District; SWP = State Water Project; N/A = not applicable; AF = acre-feet; SR = State Route; MW = megawatts; EIR = environmental impact report; I = Interstate; PV = photovoltaic.

[a] Not shown on map, as location is statewide.

6.4.2 Cumulative Impacts

Aesthetics

As discussed in Section 4.1, Aesthetics, the proposed project would not result in significant aesthetic impacts. The closest cumulative project is the AAC Surface Waters Seepage Recovery Project, which is located on the opposite side of the AAC and is not visible from the project site or vantages that include the project site. The project is not within a viewshed shared with other listed cumulative projects and as such would not contribute to a cumulative aesthetic impact.

Air Quality

Air pollution is largely a cumulative impact. The cumulative setting for air quality is the geographic scope encompassed by the SSAB. Currently, the SSAB is either in attainment or unclassified for all federal and state air pollutant standards with the exception of ozone (8-hour) and particulate matter less than 10 microns in diameter (PM_{10}). Air pollutants transported into the SSAB from the adjacent South Coast Air Basin (Los Angeles, San Bernardino County, Orange County, and Riverside County) and from Mexicali (Mexico) substantially contribute to the non-attainment conditions in the SSAB. The nonattainment status of regional pollutants is a result of past and present development, and the Imperial County Air Pollution Control District (ICAPCD) develops and implements plans for future attainment of ambient air quality standards. The SSAB has been designated as a federal and state nonattainment area for ozone (O_3) and PM_{10}. The nonattainment status is the result of cumulative emissions from various sources of air pollutants and their precursors within the SSAB, including motor vehicles, off-road equipment, and commercial and industrial facilities. Based on these considerations, project-level thresholds of significance for criteria pollutants are used to help determine whether a project's individual emissions would have a cumulatively considerable contribution on air quality. If a project's emissions would exceed the ICAPCD significance thresholds, it would be considered to have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant. Construction of the proposed project would generate reactive organic gases and oxides of nitrogen emissions (which are precursors to ozone) and emissions of PM_{10} and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$). As indicated in Table 4.2-2, project-generated construction oxides of nitrogen (NO_x) emissions would likely exceed the ICAPCD emission-based significance threshold. **MM-AQ-1** and **MM-AQ-2** would reduce impacts to levels below significance. Cumulative PM_{10} and $PM_{2.5}$ emissions would be reduced because all future projects would be subject to Regulation VIII – Fugitive Dust Control Measures, which sets forth general and specific requirements for all construction sites in the ICAPCD. Based on the previous considerations, the project would result in a cumulatively considerable increase in emissions of nonattainment pollutants, absent mitigation

measures. Impacts would be reduced to levels below significance with implementation of **MM-AQ-1** and **MM-AQ-2**.

Operations of the proposed project would not interfere with implementation short-term construction emissions would be mitigated to below a level of significance, and the cumulative projects would also result in less than significant impacts. Further, the proposed project would not conflict with any of the state's greenhouse gas (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 not be cumulatively considerable. As such, the proposed project would not result in a cumulatively considerable impact related to air quality.

Biological Resources

As stated in Section 4.3, Biological Resources, temporary and permanent impacts would occur with construction of the proposed project. In addition, there would be construction and operation-related indirect impacts related to dust and chemical pollutants, and chemical releases from vehicles. As discussed in Section 4.6, Hydrology and Water Quality, operations of the proposed project would not result in significant water quality impacts as the proposed intake channel would be lined, reducing the amount of erosion and sedimentation of the water passing through. In addition, the proposed project would not increase or decrease the amount of agricultural water diverted from the AAC, since the proposed reservoir serves as temporary storage to support water conservation and management efforts. Considering the proposed project would not substantially affect water quality or water quantity, cumulative impacts to downstream biological resources and water bodies such as the Salton Sea would not be substantially affected by the proposed project.

Impacts to biological resources as a result of the proposed project would be mitigated to levels below significance. Cumulative projects listed in Table 6-1, such as the AAC Surface Waters Seepage Recovery Project, that may have temporary and permanent impacts to biological resources would also be mitigated on a project-by-project basis and subject to federal, state, and local regulations. Therefore, cumulative impacts to biological resources are considered less than cumulatively considerable.

Cultural Resources

As stated in Section 4.4, Cultural Resources, there is the possibility of impacting inadvertent discoveries of buried archaeological deposits during construction, which would have potentially significant impacts. **MM-CR-1** through **MM-CR-4** would ensure oversight and consultation obligations, protection of unknown archaeological resources, paleontological resources, and/or grave sites. Implementation of the proposed project, in combination with large-scale proposed, approved,

and reasonably foreseeable projects in the region, has the potential to result in impacts to archaeological and historic resources. Further, the cumulative projects listed in Table 6-1 would be subject to the applicable federal, state, and local regulations protecting these resources. Therefore, considering impacts are addressed on a project-by-project basis, this would be a less than cumulatively considerable impact.

Hazards and Hazardous Materials

As discussed in Section 4.5, Hazards and Hazardous Materials, the proposed project would comply with federal, state, and local health and safety requirements that are intended to minimize hazardous materials risk to the public, such as California Occupational Safety and Health Administration requirements, the Hazardous Waste Control Act, California Accidental Release Prevention, and the California Health and Safety Code. In addition, with incorporation of **MM-HAZ-1** through **MM-HAZ-3** and **MM-AQ-2**, use and disposal of hazardous materials would not pose a significant risk to the public and environment. However, hazards and hazardous materials cumulative impacts are addressed on a project-by-project basis, and considering there are no projects listed in Table 6-1 within a 1-mile radius of the proposed project, there are no projects within the geographic scope for the consideration of cumulative effects from hazardous materials sites. Therefore, cumulative impacts to hazards and hazardous materials would be less than cumulatively considerable.

Hydrology and Water Quality

As discussed in Section 4.6, Hydrology and Water Quality, the proposed project would not result in significant hydrology or water quality impacts. The project in combination with cumulative projects listed in Table 6-1, specifically the AAC Surface Waters Seepage Recovery Project, would result in increased water management leading to improved efficiencies in water delivery and conservation within IID's system. The proposed project and each of the cumulative projects listed in Table 6-1 would be required to adhere to all applicable regulations, including the National Pollutant Discharge Elimination System and stormwater pollution prevention plan requirements that would avoid impacts to water quality and drainage. Further, the proposed project would not use or otherwise alter the groundwater conditions in the area. As such, the proposed project would not contribute to a cumulative hydrology or water quality impact.

Land Use and Planning

As discussed in Section 4.7, Land Use and Planning, the proposed project would not result in significant land use impacts. The proposed project would not conflict with applicable adopted plans and none of the projects listed in Table 6-1 would conflict with applicable adopted plans through either project design or undertaking any necessary planning approvals, such as a

conditional use permit. As such, the project would not contribute to a cumulative land use and planning impact.

Noise

As discussed in Section 4.8, Noise, impacts associated with noise from construction activities as operations were considered less than significant. The project area is rural, with few sensitive receptors, and construction noise would occur for a limited duration. No other cumulative projects are proposed to be constructed within 1 mile of the proposed project. The nearest project is the AAC Seepage Recovery Project, located approximately 3.3 miles away from the proposed project. Therefore, the proposed project's contribution to cumulative noise levels would be less than cumulatively considerable during construction. Therefore, cumulative noise impacts would be less than cumulatively considerable.

6.4.3 Conclusion

None of the documents identified significant new cumulative impacts in association with the proposed project. Overall, there are no significant new cumulative impact circumstances or information relevant to environmental concerns and bearing on the project or its impacts.

6.5 MANDATORY FINDINGS OF SIGNIFICANCE

The proposed project would include groundbreaking activities in a rural, undeveloped area, and would thus have the potential to interfere with the habitat of a wildlife species, as well as impact cultural, paleontological, and tribal resources. However, as discussed in Section 4.3, with implementation of **MM-BIO-1** through **MM-BIO-10**, the proposed project would have a less-than-significant impact on biological resources. Additionally, as discussed in Section 4.4, with incorporation of **MM-CR-1** through **MM-CR-4**, the proposed project would not result in significant impacts to any historical, archaeological, paleontological, or tribal cultural resources. As such, the proposed project would not degrade the quality of the environment, substantially reduce suitable habitat of a fish or wildlife species, or eliminate important examples of the major periods of California history or prehistory.

As stated in Sections 4.2 and 5.4, 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. To evaluate whether the proposed project's construction GHG emissions are cumulatively considerable, ICAPCD recommends that projects are assessed based on if 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. The

proposed project would result in amortized construction emissions of approximately 52 metric tons carbon dioxide equivalent per year, which is substantially less than the thresholds provided in Section 4.2. Based on the preceding considerations, the proposed project's construction GHG emissions are not cumulatively considerable and are considered less than significant.

The proposed project would include the use of construction equipment that would produce emissions. The contribution of emissions to the airshed has the potential to have an adverse effect on human beings. Construction activity would occur at various locations within the project site and would not be situated in the same location for an extended period of time. The nearest receptors are 150 feet and 0.2 miles south from the proposed project site, otherwise there are no other sensitive receptors within 5,000 feet (0.95 miles) of the project site. As such, the site is surrounded by an insignificant number of people and therefore would not create a significant air quality impact affecting a substantial number of people. As stated in Section 4.8, Noise, at the nearest residence (measured from the nearest residence to the project boundary), noise levels would not exceed 74 A-weighted decibels equivalent sound level (dBA L_{eq}) during the most intensive construction phases. Typically, the noise from construction would be substantially lower, within a range of 63 to 64 dBA L_{eq}. As such, thresholds would not be exceeded during construction of the proposed project. However, average noise levels from construction activities may be annoying from the nearest sensitive receptors since levels are expected to be higher than the ambient noise level in the site vicinity. However, restricting construction activities to the daytime period will avoid disruption of evening relaxation and overnight sleep periods. Additionally, this would be further reduced provided that the standard noise control measures included in **Project Design Feature (PDF) NOI-1** would be implemented. Considering that the nearest receptors are 150 feet and 0.2 miles south from the proposed project site, there are no other sensitive receptors within 5,000 feet (0.95 miles) of the project site, and the project would not result in significant direct or indirect impacts in regard to air quality and noise, the proposed project would not cause substantial adverse effects on human beings.

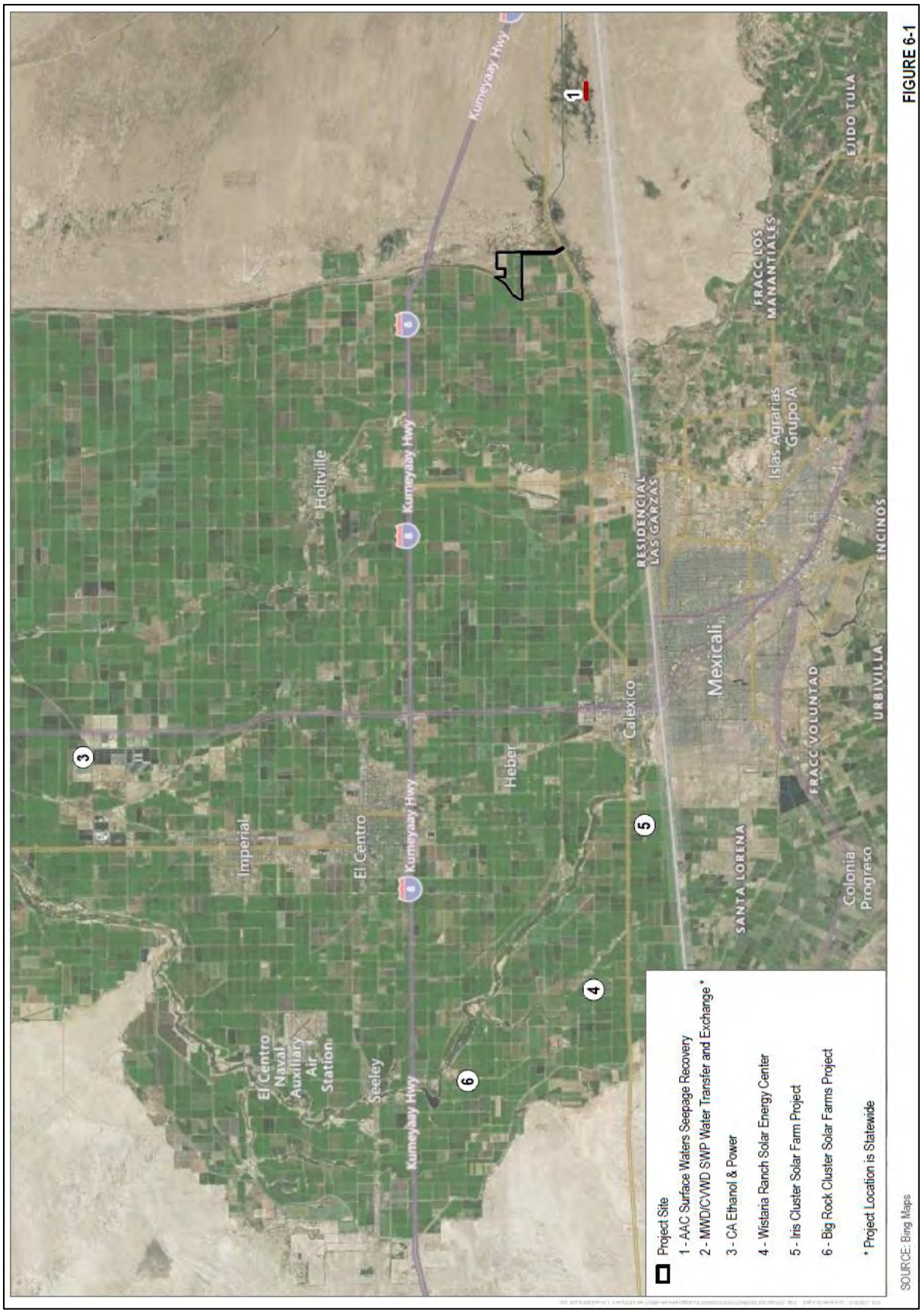
Project Site
1 - AAC Surface Waters Seepage Recovery
2 - MWD/CVWD SWP Water Transfer and Exchange *
3 - CA Ethanol & Power
4 - Wistaria Ranch Solar Energy Center
5 - Iris Cluster Solar Farm Project
6 - Big Rock Cluster Solar Farms Project
* Project Location is Statewide
SOURCE: Bing Maps
Kumeyaay Hwy
Holtville
Imperial
El Centro
Heber
Calexico
Mexicali
Seeley
El Centro Naval Auxiliary Air Station
RESIDENCIAL LAS GARZAS
Islas Agrarias Grupo A
FRACC LOS MANANTIALES
EJIDO TULA
ENCINOS
URBIVILLA
FRACC VOLUNTAD
SANTA LORENA
Colonia Progreso

FIGURE 6-1

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