

EXECUTIVE SUMMARY

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EXECUTIVE SUMMARY

This chapter provides a summary of the draft environmental impact report (Draft EIR) for the proposed East Highline Reservoir and Intake Channel Project (Proposed Project or Project). Included in this summary are areas of known controversy and issues to be resolved, a summary of Project alternatives, a summary of all project impacts and associated mitigation measures, and a statement of the ultimate level of significance after mitigation is applied.

ES.1 DOCUMENT PURPOSE

This Draft EIR was prepared by the Imperial Irrigation District (IID), as the responsible agency for primarily carrying out the full Project. IID is acting as lead agency to inform decision makers and the public of the potential significant environmental effects associated with the Proposed Project. This EIR has been prepared in accordance with the California Environmental Quality Act (CEQA) of 1970 (California Public Resources Code, Section 21000 et seq.) and CEQA's implementing guidelines (CEQA Guidelines; 14 CCR 15000 et seq.) published by the Resources Agency of the State of California. CEQA Guidelines Section 15123 requires that the summary identify each significant impact, recommended mitigation measures, and alternatives that would reduce or avoid the project's significant impacts on the environment. The summary also is required to identify areas of controversy, including issues raised by public agencies and the public, and the issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant impacts of the Proposed Project. This Executive Summary provides the brief summary required by CEQA Guidelines Section 15123.

ES.2 PROJECT LOCATION

The Proposed Project is located in the southern region of Imperial County, California, east of Calexico and southeast of Holtville. The Project is specifically located on five parcels (Assessor's Parcel Numbers 055-250-020, 059-310-005, 055-310-007, 055-310-006, 059-310-006), cumulatively totaling approximately 556 acres. The All-American Canal (AAC) is located approximately 1.3 miles south of the Proposed Project site. The Project is located approximately 1.1 miles north of State Route 98 (SR-98), and 2 miles south of Interstate 8. To the east of the Proposed Project site, is open and vacant desert land with desert shrubbery and patches of ground cover owned by the United States Bureau of Land Management (BLM). Agricultural fields are to the northwest, west and south of the Project site, with the East Highline (EHL) Canal (owned and operated by IID) directly adjacent to the west of the Project site.

Land Use and Zoning

The Proposed Project site is primarily flat land zoned as A-2 (General Agriculture) and A-3 (Heavy Agriculture), with a small portion that crosses a parcel of federal lands withdrawn to the United

States Bureau of Reclamation (Reclamation). According to the Imperial County (County) General Plan Land Use Element, the Proposed Project site is designated as both Agriculture and Recreation/Open Space.

ES.3 PROJECT DESCRIPTION

ES.3.1 Project Background

IID is a limited-purpose public agency, formed under the laws of the State of California. IID holds rights to take water from the Colorado River and deliver it to its water service area within the County. IID's operational activities are associated with irrigation (i.e., the diversion, measurement, conveyance, and delivery of Colorado River water to customers within the IID water service area through its canal system), drainage (i.e., the collection, removal, measurement, and transport of drainage waters to the Salton Sea), hydroelectric power, and energy services. IID provides agricultural water to approximately 475,000 acres of some of the most intensively farmed land in the nation. IID delivers 97 percent of its water to agricultural operations.

To improve system efficiencies, IID currently uses 11 independent regulating reservoirs to level out the variability in water supply and demand. The Quantification Settlement Agreement (QSA) completed in 2003 enabled California to implement major Colorado River water conservation and transfer programs, stabilizing water supplies for 75 years and reducing the state's demand on the Colorado River to its 4.4 million acre-foot entitlement. The QSA includes water conservation/transfer and exchange projects among IID, including San Diego County Water Authority (SDCWA), Coachella Valley Water District (CVWD), and Metropolitan Water District of Southern California (MWD). The Proposed Project is a mechanism to increase water management efficiency and thus the water supply for the County, in accordance with the QSA.

ES.3.2 Project Summary

The Proposed Project includes a single cell reservoir facility (with a split cell design option), covering approximately 370 acres, within a 417-acre Project footprint, which would manage up to 3,400 acre-feet of water. The water managed in the proposed reservoir would then gravity flow into the EHL Canal, one of three main canals (all owned and operated by IID) that branch off the AAC, a facility owned by the United States Department of the Interior through Reclamation. The Proposed Project also includes an intake channel, which would branch off the north side of the AAC into a new proposed right-of-way (ROW), approximately 1.3 miles in length, to convey the operational water flows from the AAC through the open channel and to the proposed reservoir at a flow rate of up to 1,500 cubic feet per second (cfs). Stored water would be delivered through an automated gate outlet and structure with a gravity flow capacity of approximately 1,500 cubic feet per second for delivery into the EHL Canal. Two potential staging areas are anticipated in the northwest and northeast portions of the Proposed Project site within 35 acres of IID owned land.

ES.3.3 Proposed Project Objectives

The purpose of the Proposed Project is to augment IID’s current levels of operational flexibility while creating an additional tool to assist in meeting main-system and on-farm conservation program goals consistent with IID’s Water Conservation Plan. The Project is also consistent with the State of California’s water conservation objectives established under Executive Order B-37-16 and the Reclamation Reform Act. Objectives are as follows:

- The Project will increase delivery flexibility and provide conservation opportunities within the district to accommodate in-valley water demand. These efforts are consistent with the objectives set forth in IID’s 2016 Water Conservation Plan. Mid lateral and off line reservoirs are an integral part of the IID System Conservation Program.
- The Project will help support IID’s 12-Hour Delivery Program via maximized operational storage capacity and flexibility, enabling farmers to match crop water requirements and conserve water. The reservoir will help balance supply-demand mismatches due in part to conveyance travel time, peak demands, unavailable storage, and rain events.
- The Project will provide consistency with the 2018 California Water Plan goals: Goal 2-Strengthen Resiliency and Operational Flexibility of Existing and Future Infrastructure; Goal 4-Empower California’s Under-Represented and Vulnerable Communities; and, Goal 6-Support Real-time Decision-making, Adaptive Management, and Long-term Planning.
- The Project will be in support of the Reclamation Reform Act of 1982 to “. . . encourage . . . consideration and incorporation of prudent and responsible water conservation measures . . . by . . . recipients of irrigation, municipal and industrial water . . .”

The specific project design objectives are described below.

- Optimal reservoir placement that will benefit the greatest number of downstream IID water users and on-farm water conservation efforts.
- Utilize a route with the most beneficial hydrologic conditions to accommodate gravity flow (i.e., avoiding/minimizing pumping).
- Minimize the length of the intake channel from AAC and the outflow channel to EHL Canal.
- Minimize displacement of existing IID and farming infrastructure.

ES.3.4 Required Permits and/or Approval

Implementation of the Proposed Project would require discretionary approvals by federal, state and local agencies, including but not limited to those shown in Table ES-1. Discretionary approvals would include certification of the Final EIR under CEQA, and approval and adoption of the Proposed Project by IID.

**Table ES-1
Project Approvals**

Authorizing Jurisdiction or Agency	Action
U.S. Bureau of Reclamation	Issuance of a license
State Water Resources Control Board	Construction General Permit (NPDES/SWPPP)
California Department of Transportation	Approval of Encroachment Permit/Temporary Detour SR-86
California Department of Fish and Wildlife	Approval of Section 1602 Streambed Alteration Agreement
California Regional Water Quality Control Board	Clean Water Act Section 402 Permit NPDES Certification
Imperial County Public Works Department	Road Abandonment of Holdridge Road Holdridge Road Realignment Design Approval
Imperial County Air Pollution Control District	Approval of Authority to construct and/or permits to operate; Approval of Dust Control Plan

Notes: SWPPP= Storm Water Pollution Prevention Plan; NPDES = National Pollutant Discharge Elimination System

ES.4 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Table ES-2 provides a summary of the impact analysis related to the Proposed Project, including potential significant environmental impacts expected to result from the Proposed Project pursuant to CEQA Guidelines Section 15123(b)(1). These impacts are applicable for the single cell reservoir design as well as for the split cell reservoir design option. For more detailed discussion, please see Chapter 4, Environmental Analysis, of this EIR. Table ES-2 also lists the applicable mitigation measures related to the identified significant impacts, as well as the level of significance after mitigation is identified. As stated in Chapter 2, Environmental Setting, of this Draft EIR, the Initial Study prepared and circulated with the Notice of Preparation (NOP) for public review on the Proposed Project concluded that the Proposed Project would not result in significant impacts to agricultural and forestry resources or mineral resources. As a result, these topics are not addressed in the EIR and not summarized in Table ES-2.

Table ES-2
Summary of Environmental Impacts of the Proposed Project

Environmental Topic	Mitigation Measures and Project Design Features	Level of Significance After Mitigation
<i>Aesthetics</i>		
Would the project have a substantial adverse effect on a scenic vista?	N/A	No Impact
Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	N/A	No Impact
Would the project substantially degrade the existing visual character or quality of the site and its surroundings?	N/A	Less than significant
Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	N/A	Less than significant
<i>Air Quality</i>		
Would the project conflict with or obstruct implementation of the applicable air quality plan?	<p>MM-AQ-1: Discretionary Mitigation Measures for Fugitive PM₁₀ Control</p> <ol style="list-style-type: none"> 1. Water exposed soil with adequate frequency for continued moist soil. 2. Replace ground cover in disturbed areas as quickly as possible. 3. Vehicle speed for all construction vehicles shall not exceed 15 miles per hour on any unpaved surface at the construction site. <p>MM-AQ-2: ICAPCD Standard Measures</p> <p>Pursuant to Imperial County's APCD, all construction sites, regardless of size, must comply with the requirements contained within Regulation VIII-Fugitive Dust Control Measures. These mitigation measures listed below shall be implemented prior to and during construction. The County Department of Public Works will verify implementation and compliance with these measures.</p> <p>ICAPCD Standard Measures for Fugitive Dust (PM₁₀) Control</p> <ul style="list-style-type: none"> • All disturbed areas, including Bulk Material storage which is not being actively utilized, shall be effectively stabilized and visible emissions shall be limited to no greater than 20% opacity for dust emissions by using water, 	Less than significant

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	<p>chemical stabilizers, dust suppressants, tarps or other suitable material such as vegetative ground cover.</p> <ul style="list-style-type: none"> • All on site and off site unpaved roads will be effectively stabilized and visible emissions shall be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering. • All unpaved traffic areas one (1) acre or more with 75 or more average vehicle trips per day will be effectively stabilized and visible emission shall be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering. • The transport of Bulk Materials shall be completely covered unless six inches of freeboard space from the top of the container is maintained with no spillage and loss of Bulk Material. In addition, the cargo compartment of all Haul Trucks is to be cleaned and/or washed at delivery site after removal of Bulk Material. • All Track-Out or Carry-Out will be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an Urban area. • Movement of Bulk Material handling or transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers or by sheltering or enclosing the operation and transfer line. • The construction of any new Unpaved Road is prohibited within any area with a population of 500 or more unless the road meets the definition of a Temporary Unpaved Road. Any temporary unpaved road shall be effectively stabilized and visible emissions shall be limited to no greater than 20% opacity for dust emission by paving, chemical stabilizers, dust suppressants and/or watering. <p>ICAPCD Standard Measures for Construction Combustion Equipment</p> <ul style="list-style-type: none"> • Use of alternative fueled or catalyst equipped diesel construction equipment, including all off-road and portable diesel powered equipment. • Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes as a maximum. • Limit, to the extent feasible, the hours of operation of heavy duty equipment and/or the amount of equipment in use. 	

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Environmental Topic	Mitigation Measures and Project Design Features	Level of Significance After Mitigation
	<ul style="list-style-type: none"> • Replace fossil fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set). • Construction equipment operating onsite should be equipped with two to four degree engine timing retard or precombustion chamber engines. • Construction equipment used for the project should utilize EPA Tier 2 or better engine technology. • Keep vehicles well maintained to prevent leaks and minimize emissions, and encourage employees to do the same. <p>ICAPCD “Discretionary” Measures for Fugitive Dust (PM₁₀) Control</p> <ul style="list-style-type: none"> • Water exposed soil with adequate frequency for continued moist soil, including a minimum of three wettings per day during grading activities. • Replace ground cover in disturbed areas as quickly as possible. • Automatic sprinkler system installed on all soil piles. • Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site. • Implement the trip reduction plan to achieve a 1.5 AVR for construction employees. • Implement a shuttle service to and from retail services and food establishments during lunch hours. <p>Enhanced Mitigation Measures for Construction Equipment</p> <ul style="list-style-type: none"> • Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing of construction activity during the peak hour of vehicular traffic on adjacent roadways. • Implement activity management (e.g. rescheduling activities to reduce short-term impacts). 	
Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?	MM-AQ-1 and MM-AQ-2 (see above)	Less than significant
Would the project result in a cumulatively considerable new increase of any criteria pollutant for which the project region is non-	MM-AQ-1 and MM-AQ-2 (see above)	Less than significant

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Summary of Environmental Impacts of the Proposed Project**

Environmental Topic	Mitigation Measures and Project Design Features	Level of Significance After Mitigation
attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative threshold emissions which exceed quantitative thresholds for ozone precursors)?		
<i>Biological Resources</i>		
<p>Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game (CDFG) or U.S. Fish and Wildlife Service (USFWS)?</p>	<p>MM-BIO-1: General Avoidance and Minimization Measures</p> <p>The following avoidance and minimization measures shall be implemented during project construction and operations and maintenance.</p> <p>Work Hours</p> <ul style="list-style-type: none"> • Construction and operations and maintenance activities within 50 feet of the outside edge of the construction zone or work area containing habitat for special-status wildlife will be prohibited between sunset and sunrise, and all construction-related or maintenance-related lighting will be turned off during that period, with the exception of lighting for maintenance during operations and maintenance and emergencies (defined as an imminent threat to life or significant property) activities. If necessary, lighting for maintenance during operations and maintenance and emergencies within 50 feet of habitat for special-status wildlife will be directed away from natural areas. <p>Debris/Non-native Vegetation/Pollution</p> <ul style="list-style-type: none"> • Fully covered trash receptacles that are animal-proof will be installed and used during construction to contain all food, food scraps, food wrappers, beverage containers, and other miscellaneous trash. Trash contained within the receptacles will be removed at least once a week from the Proposed Project site. • No litter, construction materials, or debris will be discharged into state-jurisdictional waters. • Construction work and operations and maintenance areas shall be kept clean of debris, trash, and construction materials. <p>Vehicle and Equipment Restrictions and Maintenance</p>	<p>Less than significant</p>

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Environmental Topic	Mitigation Measures and Project Design Features	Level of Significance After Mitigation
	<ul style="list-style-type: none"> • Night-time construction should be minimized to the extent possible. However, if night-time activity (e.g., equipment maintenance) is necessary, then the speed limit shall be 10 mph. • Vehicle operation within state-jurisdictional waters when surface water is present will be prohibited. Any equipment or vehicles driven and/or operated within or adjacent to a state-jurisdictional channel will be checked and maintained by the operator daily to prevent leaks of oil or other petroleum products that could be deleterious to aquatic life if introduced to the watercourse. • During construction, vehicles and equipment access will be limited to the identified impact areas, and ingress and egress will be limited to existing roads. During operations and maintenance, vehicles and equipment will be limited to maintenance access roads and the minimal area necessary to perform the work. • Staging and storage areas for spoils, equipment, materials, fuels, lubricants, and solvents will be located outside the state-jurisdictional channels and within the designated impact area. Stationary equipment, such as motors, pumps, generators, compressors, and welders, located within or adjacent to state-jurisdictional waters shall be positioned over drip-pans or other containment. Prior to refueling and lubrication, vehicles and other equipment shall be moved away from the state-jurisdictional channels. <p>Other Restrictions on Activities and Personnel</p> <ul style="list-style-type: none"> • No pets, such as cats or dogs, should be permitted on the Proposed Project site during construction or operations and maintenance. • Any contractor, employee, or agency personnel who is responsible for inadvertently killing, injuring, or trapping a listed species shall immediately report the incident to the project biologist during construction and the operations manager during operations and maintenance. The project biologist or operations manager shall contact the USFWS (for federal Endangered Species Act species) and California Department of Fish and Wildlife (CDFW) (for California Endangered Species Act species) immediately in the case of a dead, injured, or entrapped listed species. The Sacramento USFWS Office and CDFW shall be notified in writing within 3 working days of the accidental death or injury to a listed species during 	

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Environmental Topic	Mitigation Measures and Project Design Features	Level of Significance After Mitigation
	<p>project-related activities. Notification must include the date, time, and location of the incident or of the finding of a dead or injured animal and any other pertinent information. The USFWS office that covers Imperial County is located at 2177 Salk Avenue, Suite 250, Carlsbad, California 92008, 760.431.9440. The CDFW Inland Desert Region office is located at 3602 Inland Empire Boulevard, Suite C-220, Ontario, California 91764, 909.484.0167.</p> <ul style="list-style-type: none"> • To prevent inadvertent entrapment of special-status wildlife during construction, all excavated, wells, steep-walled holes or trenches more than 2 feet deep shall be covered with plywood or similar materials at the close of each working day, or be provided with one or more escape ramps constructed of earth fill or wooden planks. Before such holes or trenches are filled, they shall be thoroughly inspected for trapped wildlife. If trapped animals are observed, escape ramps or structures shall be installed immediately to allow escape. • All pipes, culverts, or similar structures with a diameter of 4 inches or more that are stored at a construction site for one or more overnight periods shall be covered at all times or shall be thoroughly inspected for special-status wildlife or nesting birds before the pipe is subsequently buried, capped, or otherwise used or moved in any way. If an animal is discovered inside a pipe, that section of pipe shall not be moved until the project biologist has been consulted and the animal has either moved from the structure on its own accord or until the animal has been captured and relocated by the project biologist. If a federally or state-listed species is discovered, that section of pipe shall not be moved until the USFWS and/or CDFW has been consulted. If necessary, under the direct supervision of the project biologist, the pipe may be moved once to remove it from the path of construction activity until the species has escaped. <p>MM-BIO-2: Environmental Awareness Training, Biological Monitoring, and Compliance Worker Environmental Awareness Program and Ongoing Training Prior to the initiation of any on-site grading, all construction/contractor personnel working on site must complete training through a Worker Environmental Awareness Program (WEAP). New construction workers engaged in construction</p>	

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	<p>activities (e.g., grading, utility installation, etc.) shall complete WEAP training within the first week of deployment on the site. Additionally, operational staff shall complete WEAP training prior to deployment on the site.</p> <p>The training shall include the following:</p> <ul style="list-style-type: none"> • Provide the training materials for WEAP training. These materials shall include the measures and mitigation requirements for protected plant and wildlife species (e.g., avoidance and buffer requirements, night-time construction limitations, etc.); and the location and mitigation requirements for waters of the state. WEAP training will also include driver training to avoid and minimize collision risks with protected species, and reporting protocols in the event that any dead or injured wildlife are discovered. • Copies of mitigation measures and permits from resource agencies, such as the CDFW and Regional Water Quality Control Board (RWQCB), will be made available. <p>Biological Monitoring and Compliance Documentation</p> <p>The project biologist shall perform the biological monitoring and compliance documentation for the project during construction, including the following:</p> <ul style="list-style-type: none"> • Prior to the initiation of any on-site grading, the project biologist will document that required pre-construction surveys and/or relocation efforts have been implemented. • The project biologist will periodically monitor activities during initial grading. • The project biologist will note any evidence of trash or microtrash and, if present, communicate the presence and requirement to remove the trash to the construction manager. <p>MM-BIO-3: Focused Surveys and Avoidance and Minimization Measures for Special-Status Plants</p> <p>Focused Surveys</p> <p>Focused surveys shall be conducted for spring-blooming special-status plant species the season prior to construction (e.g., April 2020). Focused surveys for</p>	

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	<p>special-status plant species shall be conducted by a qualified biologist according to: the CNPS Botanical Survey Guidelines (CNPS 2001); Protocols for Surveying and Evaluating Impacts to Special Status Native Populations and Natural Communities (CDFG 2009); and USFWS General Rare Plant Survey Guidelines (Cypher 2002). The focused survey shall be conducted during a period when the target species would be observable and identifiable (e.g., blooming period for annuals). The target species list will include Wiggins' croton, slender cottonheads, and sand food that have a moderate potential to occur in the Proposed Project study area. If special-status plants are not observed during focused surveys, no additional mitigation is required.</p> <p>Avoidance, Minimization, and Mitigation Measures</p> <p>If a special-status plant species is detected, the full extent of the occurrence within the study area shall be recorded. The location of each special-status plant occurrence shall be mapped and number of individuals for each occurrence documented. If impacts to special-status plants cannot be avoided, the following measures will be implemented:</p> <ol style="list-style-type: none"> 1. Special-status plants in the vicinity of the disturbance will be temporarily fenced or prominently flagged and a 50-foot buffer established around the populations to prevent inadvertent encroachment by vehicles and equipment during the activity; 2. Seeds will be collected and stored in appropriate storage conditions (e.g., cool and dry), and dispersed/transplanted following the construction activity and reapplication of salvaged topsoil; and 3. The top 6 inches of topsoil will be salvaged, stockpiled, and replaced as soon as practicable after project completion. The salvaged topsoil shall be redistributed at the same depth and contoured to blend with surrounding grades. <p>Additionally, while it is not expected that a federally or state-listed plant would be observed during these surveys, the applicant shall consult with the applicable agency (i.e., CDFW and/or USFWS) and written concurrence for measures required for federally or state-listed plant species, if observed.</p>	

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	<p>MM-BIO-4: Restoration of Temporary Impacts to Riparian and Uplands with Non-invasive Species</p> <p>Site construction areas subjected to temporary ground disturbance grading and excavations, storage and staging areas, and temporary roads, shall be recontoured to natural grade (if the grade was modified during the temporary disturbance activity), and revegetated with an application of a native riparian or upland seed mix, if necessary, prior to or during seasonal rains to promote passive restoration of the area to pre-project conditions (except that no invasive plants will be restored). An area subjected to “temporary” disturbance means any area that is disturbed but will not be subjected to further disturbance as part of the project. This measure does not apply to situations that are urban/developed that are temporarily impacted and will be returned to an urban/developed land use. Prior to seeding temporary ground disturbance areas, the project biologist will review the seeding palette to ensure that no seeding of invasive plant species, as identified in the most recent version of the California Invasive Plant Inventory for the region, will occur.</p> <p>A revegetation plan shall be prepared and outline the specific revegetation, monitoring, and success criteria for these areas.</p> <p>MM-BIO-5: Dust Control Plan</p> <p>Prior to grading or construction activities, the project proponent shall submit the dust control plan to Imperial County Air Pollution Control District (ICAPCD) for review and approval, and shall provide the plan to Imperial County, to demonstrate compliance with ICAPCD Regulation VIII (Fugitive Dust Rules), Rules 800 through 806. The plan shall address construction-related dust as required by ICAPCD.</p> <p>MM-BIO-6: Flat-Tailed Horned Lizard (FTHL) Survey and Avoidance and Minimization Measures</p>	

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	<p>Focused surveys shall be conducted within the Proposed Project study area prior to start of ground-disturbing activities between April and September to determine the status of FTHL on site. The surveys shall be conducted in accordance to the FTHL Interim Survey Protocol in order to provide an assessment of FTHL presence or absence at a specific site. Surveys should be conducted between April and September when surface temperatures are between 95° F and 122° F (FTHL Working Group of Interagency Coordinating Committee 2003).</p> <p>If the FTHL is found during the 2020 survey, pre-construction surveys shall be conducted prior to ground-disturbing construction activities. Surveys and relocation (if needed) shall be conducted in accordance with the Fencing and Removal Survey Protocols (Appendix 7 of the FTHL Interagency Coordinating Committee 2003).</p> <p>To the extent feasible, methods to find FTHLs will be designed to achieve a maximal capture rate and will include, but not be limited to, using strip transects, tracking, and raking around shrubs. During construction, the minimum survey effort will be 30 minutes per 0.40 hectare (1 acre). Persons that handle flat-tailed horned lizards will first obtain all necessary permits and authorization from the CDFW. FTHL removal surveys also will include:</p> <ol style="list-style-type: none"> 1. Accurate records maintained by the biological monitor(s) for each relocated flat-tailed horned lizard including sex, snout-vent length, weight, air temperature, location, date, time of capture and release, a close-up photo of the lizard, and a photo of the habitat where it was first encountered. To the extent feasible, a sample of the lizard scat will be collected. A Horned Lizard Observation Data Sheet and a Project Reporting Form, from Appendix 8 of the FTHL Rangewide Management Strategy (FTHL Interagency Coordinating Committee 2003) will be completed. During construction, quarterly reports describing FTHL removal activity will be submitted to the IID and CDFW. 2. The removal of FTHLs out of harm's way, including those found on access or maintenance roads, will include their relocation to nearby suitable burrowing habitat away from Proposed Project components and roads. Relocated FTHLs will be placed in the shade of a large shrub in undisturbed 	

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	<p>habitat. The Project Biologist or biological monitor will be allowed some judgment and discretion when relocating lizards to maximize survival of FTHL found on the Proposed Project site.</p> <p>MM-BIO-7: Burrowing Owl Surveys and Avoidance/Relocation.</p> <p>No less than 14 days prior to ground-disturbing activities (vegetation clearance, grading), a qualified wildlife biologist (i.e., a wildlife biologist with previous burrowing owl survey experience) shall conduct pre-construction take avoidance surveys on and within 200 meters (656 feet) of the construction zone to identify occupied breeding or wintering burrowing owl burrows. The take avoidance burrowing owl surveys shall be conducted in accordance with the Staff Report on Burrowing Owl Mitigation (2012 Staff Report: CDFG 2012) and shall consist of walking parallel transects 7 to 20 meters apart, adjusting for vegetation height and density as needed, and noting any burrows with fresh burrowing owl sign or presence of burrowing owls. As each burrow is investigated, biologists shall also look for signs of American badger and desert kit fox. Copies of the burrowing owl survey results shall be submitted to the CDFW.</p> <p>If burrowing owls are detected on site, no ground-disturbing activities shall be permitted within 200 meters (656 feet) of an occupied burrow during the breeding season (February 1 to August 31), unless otherwise authorized by CDFW. During the nonbreeding season (September 1 to January 31), ground-disturbing work can proceed near active burrows as long as the work occurs no closer than 50 meters (165 feet) from the burrow. Depending on the level of disturbance, a smaller buffer may be established in consultation with CDFW.</p>	

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Summary of Environmental Impacts of the Proposed Project**

Environmental Topic	Mitigation Measures and Project Design Features	Level of Significance After Mitigation
	<p>If avoidance of active burrows is infeasible during the nonbreeding season, then, before breeding behavior is exhibited and after the burrow is confirmed empty by site surveillance and/or scoping, a qualified biologist shall implement a passive relocation program in accordance with Appendix E (i.e., Example Components for Burrowing Owl Artificial Burrow and Exclusion Plans) of the 2012 CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012). Passive relocation consists of excluding burrowing owls from occupied burrows and providing suitable artificial burrows nearby for the excluded burrowing owls. A burrowing owl monitoring and mitigation plan will be prepared that outlines how passive relocation would occur and where the replacement burrows would be constructed. It would also outline the monitoring and maintenance requirements for the artificial burrows.</p> <p>MM-BIO-8: Nesting Bird Pre-construction Surveys and Avoidance Plan.</p> <p>This measure would protect these nesting special-status species and more common species protected under the Migratory Bird Treaty Act (MBTA), which prohibits the “take” of any migratory bird or any part, nest, or eggs of any such bird. The MBTA applies to over 800 species of birds, including rare and common species. Burrowing owl is addressed separately in a species-specific biological resource protection measure (MM-BIO-7).</p> <p>The project biologist shall conduct pre-construction surveys no earlier than 7 days prior to any on-site grading and construction activities within each construction area and a 500-foot buffer that occurs during the nesting/breeding season of special-status bird species potentially nesting on the site, with the exception of burrowing owl, which is addressed in MM-BIO-7. The pre-construction surveys shall be conducted between March and September, or as determined by the project biologist.</p> <p>The purpose of the pre-construction surveys will be to determine whether occupied nests are present in the construction zone or within 500 feet of the construction zone boundary.</p>	

**Table ES-2
Summary of Environmental Impacts of the Proposed Project**

Environmental Topic	Mitigation Measures and Project Design Features	Level of Significance After Mitigation
	<p>If occupied nests are found, then limits of construction to avoid occupied nests shall be established by the project biologist in the field with flagging, fencing, or other appropriate barriers (e.g., 250 feet around active passerine nests to 500 feet around active non-listed raptor nests), and construction personnel shall be instructed on the sensitivity of nest areas. The project biologist shall serve as a construction monitor during those periods when construction activities are to occur near active nest areas to avoid inadvertent impacts to these nests. The project biologist may adjust the 250-foot or 500-foot setback at his or her discretion depending on the species and the location of the nest (e.g., if the nest is well protected in an area buffered by dense vegetation). Once a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival, construction may proceed in the setback areas.</p>	
<p>Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.</p>	<p>MM-BIO-1, MM-BIO-2, MM-BIO-4 (see above).</p> <p>MM-BIO-9: To comply with the state regulations for impacts to “waters of the State,” the following agency permits are required, or verification that they are not required shall be obtained. The following permit and agreement shall be obtained, or provide evidence from the respective resource agency satisfactory to the director of Planning and Land Use that such an agreement or permit is not required:</p> <ol style="list-style-type: none"> 1. A Clean Water Act, Section 402 permit issued by the California RWQCB for all project-related disturbances of waters of the state and/or associated wetlands. 2. A Section 1602 Streambed Alteration Agreement issued by the CDFW for all project-related disturbances of any streambed. <p>MM-BIO-10: The IID will restore and enhance sensitive, riparian and wetland communities to mitigate for permanent impacts to 0.40 acres of arrow weed thickets and 0.08 acres of cattail marshes at a 1:1 mitigation ratio.</p>	<p>Less than significant</p>

**Table ES-2
Summary of Environmental Impacts of the Proposed Project**

Environmental Topic	Mitigation Measures and Project Design Features	Level of Significance After Mitigation
	<p>A site-specific wetlands mitigation plan shall be prepared prior to disturbance activities. The wetlands mitigation plan shall include detailed information on installation, monitoring, success criteria, and monitoring of groundwater elevation within the mitigation area.</p>	
<i>Cultural Resources</i>		
<p>Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?</p>	<p>MM-CR-1: Cultural and Paleontological Resources Monitoring and Treatment Plan (CPRMTP)</p> <p>I. Prior to Start of Construction</p> <p>A. Preparation of CPRMTP</p> <p>1. Prior to the start of construction, the Principal Investigator (PI) archaeologist shall prepare a CPRMTP that specifies and describes:</p> <ul style="list-style-type: none"> • the cultural resources Area of Potential Effect (APE) • roles and responsibilities • construction monitoring methods • Monitoring locations • reporting protocol • avoidance and protective measures for cultural resources • procedures for evaluating resource significance and/or data recovery for significant unanticipated discoveries that cannot be avoided • curation protocol • post construction requirements <p>MM-CR-2: Avoidance</p> <p>The following shall be implemented to protect known archaeological resources that have not been evaluated for significance or that have been evaluated as significant under Section 106 and CEQA:</p> <p>I. Prior to Start of Construction</p> <p>A. Identified cultural resources that have not been evaluated for significance or that have been evaluated as significant under Section 106 of the Natural Historic Preservation Act (NHPA) and CEQA, will be avoided through project design.</p>	<p>Less than significant</p>

**Table ES-2
Summary of Environmental Impacts of the Proposed Project**

Environmental Topic	Mitigation Measures and Project Design Features	Level of Significance After Mitigation
	<ol style="list-style-type: none"> 1. Prior to the start of construction, the Principal Investigator (PI) archaeologist shall ensure that resource-specific avoidance measures are implemented to prevent unanticipated impacts. These measures may include exclusionary fencing, ESA signage, or other measures deemed appropriate and as specified in the Cultural and Paleontological Resources Monitoring and Treatment Plan. <p>MM-CR-3: Construction Monitoring</p> <p>The following shall be implemented to protect unknown archaeological resources and/or grave sites that may be identified during project construction phases.</p> <ol style="list-style-type: none"> I. During Construction <ol style="list-style-type: none"> A. Monitoring of Grading/Excavation/Trenching <ol style="list-style-type: none"> 1. The Archaeological Monitor shall be present full time during all soil disturbing and grading/excavation/trenching activities within 200 feet of previously identified and unevaluated cultural resources. 2. If cultural resources are encountered during the absence of an Archaeological Monitor, work shall stop within 200 feet of discovery until the PI can determine the significance of the discovery. 3. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities in consultation with the PI. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop until the PI can consult with the Native American monitor and determine the significance of the discovery. 4. The PI may suggest a modification to the monitoring program to IID when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present. 5. The Archaeological Monitor shall document field activity via the Daily Log. B. Discovery Notification Process <ol style="list-style-type: none"> 1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but 	

**Table ES-2
Summary of Environmental Impacts of the Proposed Project**

Environmental Topic	Mitigation Measures and Project Design Features	Level of Significance After Mitigation
	<p>not limited to digging, trenching, excavating or grading activities within 200 feet of the discovery and immediately notify the PI.</p> <ol style="list-style-type: none"> 2. If the PI determines that the resource is significant or requires further evaluation, the PI shall immediately notify IID by phone of the discovery, and shall also submit written documentation to IID within 24 hours by fax or email with photos of the resource in context, if possible. 3. If the resource is determined significant or requires further evaluation, the IID will notify Reclamation. 4. No soil shall be exported off site until a determination can be made regarding the significance of the resource. <p>C. Determination of Significance</p> <ol style="list-style-type: none"> 1. The PI and Native American consultant, where Native American resources are discovered, shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section II below. <ol style="list-style-type: none"> a. The PI shall immediately notify IID by phone to discuss significance determination and whether additional mitigation is required. b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) to IID and Reclamation. The ADRP and any mitigation must be approved by IID and Reclamation before ground-disturbing activities in the area of discovery will be allowed to resume. c. If the resource is not significant, the PI shall submit a letter or email to IID indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required. II. Discovery of Human Remains If human remains are discovered, work shall halt in that area and no soil shall be exported off site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken: 	

**Table ES-2
Summary of Environmental Impacts of the Proposed Project**

Environmental Topic	Mitigation Measures and Project Design Features	Level of Significance After Mitigation
	<ul style="list-style-type: none"> A. Notification <ul style="list-style-type: none"> 1. The Archaeological Monitor shall notify the PI immediately. 2. The PI will notify IID and Reclamation immediately by phone. 3. The PI shall notify the Medical Examiner after consultation with the IID. B. Isolate discovery site <ul style="list-style-type: none"> 1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenience of the remains. 2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenience. 3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin. C. If Human Remains ARE determined to be Native American <ul style="list-style-type: none"> 1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call. 2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendant (MLD) and provide contact information. 3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes. 4. The MLD will have 48 hours to make recommendations to IID and Reclamation, for the treatment or disposition with proper dignity, of the human remains and associated grave goods. 5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if: <ul style="list-style-type: none"> a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being notified by the Commission, OR; 	

**Table ES-2
Summary of Environmental Impacts of the Proposed Project**

Environmental Topic	Mitigation Measures and Project Design Features	Level of Significance After Mitigation
	<ul style="list-style-type: none"> b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, THEN c. To protect these sites, the landowner shall do one or more of the following: <ul style="list-style-type: none"> (1) Record the site with the NAHC; (2) Record an open space or conservation easement; or (3) Record a document with the County. d. Upon the discovery of multiple Native American human remains during a ground-disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and items associated and buried with Native American human remains shall be reinterred with appropriate dignity. <p>D. If Human Remains are NOT Native American</p> <ul style="list-style-type: none"> 1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial. 2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98). 3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Archaeological Center for analysis. The decision for internment of the human remains shall be made in consultation with IID, Reclamation, any known descendant group, and the San Diego Archaeological Center. <p>III. Post Construction</p> <p>A. Submittal of Draft Monitoring Report</p> <ul style="list-style-type: none"> 1. The PI shall submit a Draft Monitoring Report which describes the results, analysis, and conclusions of all phases of the Archaeological 	

**Table ES-2
Summary of Environmental Impacts of the Proposed Project**

Environmental Topic	Mitigation Measures and Project Design Features	Level of Significance After Mitigation
	<p>Monitoring Program to IID and Reclamation for review and approval following the completion of monitoring.</p> <p>a. Recording Sites with State of California Department of Parks and Recreation</p> <p>The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.</p> <p>B. Final Monitoring Report(s)</p> <p>1. The PI shall submit the approved Final Monitoring Report to IID and Reclamation.</p>	
<p>Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</p>	<p>MM-CR-4: A literature review and paleontological field survey (as needed) will be conducted as part of site-specific CEQA review to identify potential impacts to rock units that may contain significant fossil remains (this report).</p> <ul style="list-style-type: none"> • Modify construction design, when feasible, to avoid impacts to all significant paleontological resources. • Construction monitoring by a qualified paleontologist may be recommended for locations within paleontologically sensitive sediments. If so, a Paleontological Monitoring Plan shall be prepared prior to ground disturbance in sensitive areas. • In the event of an unanticipated discovery during construction, all ground disturbance within 200 feet of the discovery will be halted or re-directed to other areas until the discovery has been recovered by a qualified paleontologist. • All paleontological resources recovered will be appropriately described, processed, and curated in a scientific institution such as a museum or university. 	<p>Less Than Significant</p>
<p>Would the project disturb any human remains, including those interred outside of dedicated cemeteries?</p>	<p>MM-CUL-3 (see above)</p>	<p>Less Than Significant</p>
<p>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code</p>	<p>MM-CUL-3 (see above)</p>	<p>Less Than Significant</p>

**Table ES-2
Summary of Environmental Impacts of the Proposed Project**

Environmental Topic	Mitigation Measures and Project Design Features	Level of Significance After Mitigation
<p>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:</p> <ul style="list-style-type: none"> a. 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 b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) 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? 		
<i>Hazards and Hazardous Materials</i>		
<p>Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</p>	<p>MM-HAZ-1: Due to past uses for agriculture, prior to grading activities, soil shall be sampled and analyzed for metals and residual pesticides. Sampling shall be conducted in accordance with California Department of Toxic Substances Control guidance documents. The soil testing will confirm the presence or absence of on-site contamination associated with past uses on the project site. Any soils qualifying as hazardous waste shall delineated, removed, and properly disposed of off site. Any soil that exceeds the California Human Health Screening Levels shall be either remediated on site to levels protective of human health or removed and properly disposed of off site. Should contaminants be identified, a qualified Reclamation Hazardous Materials Specialist for the project shall be retained to ensure appropriate remediation is conducted and completed in accordance to the regulations specific to the contaminants identified.</p>	<p>Less than significant</p>

Table ES-2
Summary of Environmental Impacts of the Proposed Project

Environmental Topic	Mitigation Measures and Project Design Features	Level of Significance After Mitigation
	<p>MM-HAZ-2: A hazardous materials contingency plan shall be followed during demolition, excavation, and construction activities for the project. The hazardous materials contingency plan shall include, at a minimum, the following:</p> <ul style="list-style-type: none"> • Identification of known areas with hazardous waste and hazardous materials of concern • Procedures for temporary cessation of construction activity and evaluation of the level of environmental concern • Procedures for restricting access to the contaminated area except for properly trained personnel • Procedures for notification and reporting, including internal management and local agencies (e.g., Imperial County Fire Department, Imperial County Public Health Department), as needed • Health and safety measures for removal and excavation of contaminated soil • Procedures for characterizing and managing excavated soils • Procedures for certification of completion of remediation <p>Site workers shall be familiar with the hazardous materials contingency plan and should be fully trained on how to identify suspected contaminated soil.</p> <p>MM-HAZ-3: During construction, if aggregate aboveground oil/fuel storage capacity is greater than 1,320 gallons (or completely buried 42,000 gallons) and there is a reasonable expectation of an oil discharge into or upon navigable waters of the United States or adjoining shorelines, a spill prevention, control, and countermeasures (SPCC) plan pursuant to 40 CFR 112 (or, for small quantities, a spill prevention and response plan) shall be prepared and implemented during construction and, if applicable, during site operations. The SPCC plan (or spill prevention and response plan) shall identify best management practices for spill and release prevention and provide procedures for cleaning up and disposing of any spills or releases.</p> <p>MM-AQ-2: (see above)</p>	

Table ES-2
Summary of Environmental Impacts of the Proposed Project

Environmental Topic	Mitigation Measures and Project Design Features	Level of Significance After Mitigation
<i>Hydrology and Water Quality</i>		
Would the project violate any water quality standards or waste discharge requirements?	N/A	Less than significant
Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	N/A	No impact
Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	N/A	No impact
Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	N/A	No impact
Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	N/A	No impact
Would the project otherwise substantially degrade water quality?	N/A	Less than significant
Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance	N/A	No impact

**Table ES-2
Summary of Environmental Impacts of the Proposed Project**

Environmental Topic	Mitigation Measures and Project Design Features	Level of Significance After Mitigation
Rate Map or other flood hazard delineation map?		
Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	N/A	No impact
Would the project result in inundation by seiche, tsunami, or mudflow?	N/A	No impact
<i>Land Use and Planning</i>		
Would the project physically divide an established community?	N/A	No impact
Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	N/A	Less than significant
Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?	N/A	Less than significant
<i>Noise</i>		
Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<p>Project Design Feature-NOI-1: Noise-generating activities at the construction site or in areas adjacent to the construction site associated with the project in any way shall be restricted to the hours of 8:00 a.m. to 6:00 p.m. In addition, all construction activity shall comply with the following requirements:</p> <ol style="list-style-type: none"> 1. Available noise suppression devices shall be used and loud construction equipment shall be properly maintained and muffled. 2. Unnecessary idling of equipment shall be avoided and construction equipment shall be staged as far as reasonable from residences. 3. Adjacent uses shall be notified of the construction schedule. 	Less than significant

**Table ES-2
Summary of Environmental Impacts of the Proposed Project**

Environmental Topic	Mitigation Measures and Project Design Features	Level of Significance After Mitigation
	<p>4. A “noise disturbance coordinator” who would be responsible for responding to any local complaints about construction noise shall be designated. The disturbance coordinator would determine the cause of the noise complaints (e.g., starting too early, bad muffler) and would require that reasonable measures warranted to correct the problem be implemented. A telephone number for the disturbance coordinator shall be posted conspicuously at the construction site and included in the notice sent to neighbors regarding the construction schedule.</p> <p>5. All noise-producing project equipment and vehicles using internal combustion engines shall be equipped with mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features in good operating condition that meet or exceed original factory specification. Mobile or fixed “package” equipment (e.g., arc-welders, air compressors) shall be equipped with shrouds and noise control features that are readily available for that type of equipment.</p> <p>6. All mobile or fixed noise-producing equipment used on the project that are regulated for noise output by a local, state, or federal agency shall comply with such regulation while in the course of project activity.</p> <p>7. Construction site and access road speed limits shall be established and enforced during the construction period.</p> <p>8. The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only.</p> <p>9. Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent if necessary.</p>	
Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	N/A	Less than significant
Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	N/A	Less than significant

Notes: ICAPCD = Imperial County Air Pollution Control District; AVR = average vehicle ridership; N/A = not applicable.

ES.5 AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED

Section 15123(b) (2) of the CEQA Guidelines requires that areas of controversy known to the lead agency be stated in the EIR summary. To determine the number, scope, and extent of the environmental topics to be addressed in this EIR, IID prepared an NOP and Initial Study and circulated the NOP and Initial Study to interested public agencies, organizations, and individuals in order to receive input on the Proposed Project. During the NOP comment period, which commenced on January 30, 2019, and closed March 1, 2019, four comment letters were received by IID. Comments and potential issues included that the proposed single cell reservoir meets the criteria for a dam in accordance with Section 6002 and 6003 of the California Water Code; Native American tribal consultation recommendations; the project's land use and applicable permits; details for maintenance driveways; and aesthetics and biological resources.

ES.6 SUMMARY OF PROJECT ALTERNATIVES

Section 15126.6 of the CEQA Guidelines identifies the parameters within which consideration and discussion of alternatives to the Project should occur. Alternatives are to include those that are reasonably feasible and would attain most of the basic objectives of the project. Alternatives should be capable of avoiding or substantially lessening any significant effects of the project. The rationale for selecting the alternatives to be evaluated and a discussion of the No Project Alternative are also required.

A reasonable range of alternatives were considered during the preliminary planning stages but rejected based on screening criteria used to evaluate alternatives during the early planning stages. Alternatives considered and rejected include a Multiple Smaller Reservoirs Alternative and the Single Reservoir Alternative Site Locations Alternative. Section 3.4.1 of this Draft EIR provides the rationale for excluding them from moving forward with further analysis in this EIR.

The EIR identifies three project alternatives developed during the conceptual planning phase of the Proposed Project for analysis. All three Alternatives, except for the No Project Alternative, would be able to accommodate the split cell design option within the respective alternative project footprint.

- **No Project Alternative.** This alternative is required by CEQA, and it compares the present existing condition of the Proposed Project site against the significant impacts that would result from implementation of the Proposed Project. Under this alternative, the existing agricultural would continue to be farmed, and similar to the surrounding agricultural uses, the site would continue receiving water supplies by diverting water from the EHL Canal and the AAC.
- **Reduced Size Reservoir Alternative.** Under this alternative, a 2,700 acre-foot reservoir, approximately 290 acres of agricultural land would be constructed. Compared to the

proposed 370-acre reservoir, the Reduced Size Reservoir would be approximately 70 acres smaller, with 700 acre-feet less water capacity.

- Alternative Intake Route Alternative.** This alternative would entail the proposed reservoir in the same placement; however, the intake route to the AAC would be located farther east of where the proposed intake route is, through BLM land. This alternative would extend directly north from the AAC and roughly parallel the western boundary of the BLM lands, staying on the farmland, to the EHL Reservoir site as proposed at approximately the same connection location.

Table ES-3 provides a summary of the impacts of each alternative as it compares to the Proposed Project. The Reduced Size Reservoir Alternative would result in similar types of potentially significant impacts as the Proposed Project, although the impacts would be at a reduced severity due to the reduced size of this alternative. Additionally, the Reduced Size Reservoir Alternative would not fully meet the project objectives due, in part, to the reduced water capacity that would be provided under this alternative. The Alternative Intake Route Alternative would potentially increase the significance of impacts related to biological resources, cultural resources, land use and planning, and mineral resources.

The No Project Alternative, in comparison, would result in no potentially significant impacts. However, the No Project Alternative would not meet any of the project objectives. Of the other project alternatives, the Reduced Size Reservoir Alternative is the environmentally superior alternative because it would result in reduced impacts compared to the Proposed Project.

**Table ES-3
Alternatives Matrix – Impacts Comparison**

Environmental Issue	Proposed Project	No Project Alternative	Reduced Size Reservoir Alternative	Alternative Intake Route Alternative
Aesthetics	Less than significant	Less than Proposed Project, no impact	Less than Proposed Project, less-than-significant impact	Increased severity compared to the project, less-than-significant impact
Agricultural and Forestry Resources	Less than significant	Less than Proposed Project, no impact	Less than Proposed Project, less-than-significant impact	Similar impacts as Proposed Project, less-than-significant impact
Air Quality	Less than significant with incorporation of mitigation	Less than Proposed Project, no impact	Less than Proposed Project, less-than-significant impact	Less than Proposed Project, less-than-significant impact
Biological Resources	Less than significant with incorporation of mitigation	Less than Proposed Project, no impact	Less than Proposed Project, less-than-significant impact	Increased severity compared to the project, less-than-significant impact with mitigation incorporated
Cultural Resources	Less than significant with	Less than Proposed Project, no impact	Less than Proposed Project, less-than-significant impact	Increased severity compared to the project,

**Table ES-3
Alternatives Matrix – Impacts Comparison**

Environmental Issue	Proposed Project	No Project Alternative	Reduced Size Reservoir Alternative	Alternative Intake Route Alternative
	incorporation of mitigation			less-than-significant impact with mitigation incorporated
Energy	Less than significant	Less than Proposed Project, no impact	Less than Proposed Project, less-than-significant impact	Less than Proposed Project, less-than-significant impact
Geology and Soils	Less than significant	Less than Proposed Project, no impact	Less than Proposed Project, less-than-significant impact	Similar impacts as Proposed Project, less-than-significant impact
Greenhouse Gases	Less than significant	Less than Proposed Project, no impact	Less than Proposed Project, less-than-significant impact	Less than Proposed Project, less-than-significant impact
Hazards and Hazardous Materials	Less than significant with incorporation of mitigation	Less than Proposed Project, no impact	Less than Proposed Project, less-than-significant impact	Less than Proposed Project, less-than-significant impact with mitigation incorporated
Hydrology and Water Quality	Less than significant	Less than Proposed Project, no impact	Less than Proposed Project, less-than-significant impact	Similar impacts as Proposed Project, less-than-significant impact
Land Use and Planning	Less than significant	Less than Proposed Project, no impact	Similar impacts as Proposed Project, less-than-significant impact	Increased severity compared to the project, significant and unavoidable
Mineral Resources	Less than significant	Less than Proposed Project, no impact	Less than Proposed Project, less-than-significant impact	Similar impacts as Proposed Project, less-than-significant impact
Noise	Less than significant	Less than Proposed Project, no impact	Less than Proposed Project, less-than-significant impact	Similar impacts as Proposed Project, less-than-significant impact
Population and Housing	Less than significant	Less than Proposed Project, no impact	Similar impacts as Proposed Project, less-than-significant impact	Similar impacts as Proposed Project, less-than-significant impact
Public Services	Less than significant	Less than Proposed Project, no impact	Similar impacts as Proposed Project, less-than-significant impact	Similar impacts as Proposed Project, less-than-significant impact
Recreation	Less than significant	Less than Proposed Project, no impact	Similar impacts as Proposed Project, less-than-significant impact	Similar impacts as Proposed Project, less-than-significant impact
Transportation/ Circulation	Less than significant	Less than Proposed Project, no impact	Similar impacts as Proposed Project, less-than-significant impact	Similar impacts as Proposed Project, less-than-significant impact
Utilities and Service Systems	Less than significant	Less than Proposed Project, no impact	Similar impacts as Proposed Project, less-than-significant impact	Similar impacts as Proposed Project, less-than-significant impact
Meets Most of the Basic Project Objectives?	Yes	No	Yes	Yes

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