Imperial Irrigation District
Equitable Distribution Plan
NEGATIVE DECLARATION

1. Introduction

This Negative Declaration is being prepared pursuant to the requirements of the California Environmental Quality Act (CEQA). It incorporates an Initial Study evaluating the potential for environmental impacts associated with the adoption and implementation of the proposed Equitable Distribution Plan in the Imperial Irrigation District (IID or District). Based upon the information contained in the Initial Study, this Negative Declaration concludes that the Equitable Distribution Plan will not have a significant effect on the environment. The Equitable Distribution Plan is not the assignment or conveyance of a water right but rather a process intended to provide a predictable method to apportion the available supply of water in years when IID determines that the demand exceeds supply.

In October 2003, IID signed the Quantification Settlement Agreement and related agreements (collectively referred to herein as the "QSA"). Pursuant to the QSA, IID agreed to limit its annual Priority 3 diversions of Colorado River water to 3.1 million acre-feet (MAF) per year. IID’s obligations under the QSA have been assessed in the Final EIR/EIS for the IID Water Conservation and Transfer Project (Transfer Project), certified by the IID Board of Directors in June 2002, as supplemented by an Addendum thereto approved by the IID Board in October 2003. As a result of this cap on diversions, the demand for water by users within the District may exceed the supply available to the District, referred to herein as a “supply/demand imbalance” (SDI). IID has determined that a plan must be adopted to equitably distribute the available water supplies amongst the users in the event that IID determines that an SDI is likely to occur in any individual year. The equitable distribution of water is required pursuant to California Water Code Section 22252 which states:

> 22252. When any charges for the use of water are fixed by a district the water for the use of which the charges have been fixed shall be distributed equitably as determined by the board among those offering to make the required payment.

The Equitable Distribution Plan evaluated herein provides an approach for apportioning or allocating water in any individual year where the District anticipates that the demand for water by users within the District is likely to exceed the supply available to the District. This scenario, referred to as a “supply/demand imbalance” (SDI), will occur with or without an Equitable Distribution Plan.

This analysis does not consider the effects of the SDI itself, since the occurrence of an imbalance is outside the control of IID. Rather, this analysis considers the effects of implementing the Equitable Distribution Plan, in the event of an SDI. Recent
analyses of water demand in the District indicate that an SDI could occur in up to 52% of the years during the term of the Transfer Project. The Equitable Distribution Plan implements State law and also eases the burden on water users by providing agricultural users with more certainty regarding the method of water allocation in the event of an SDI, so they can plan appropriately and minimize economic effects of a reduction of their water supply.

An SDI situation could occur because either supply is low or demand is high. Demand could be high because of weather conditions (e.g., unusually high temperatures lead to higher rates of water application) or because of cropping and other management decisions by growers (e.g., unusually favorable market conditions lead to a larger acreage of higher water-using crops). If an SDI is anticipated to occur, for any reason, available supplies would be allocated in accordance with the procedures described in the proposed Equitable Distribution Plan as summarized below in the Project Description.

This Initial Study provides an analysis of the potential for environmental impacts resulting from the implementation of the Equitable Distribution Plan pursuant to the requirements of the CEQA Guidelines, Title 14, Articles 5 and 6.

2. Project Description

2.1 Project Location

Through its extensive system of more than 3,000 miles of canals and drains, IID currently provides up to 3.1 MAF of Colorado River water annually to nearly one-half million irrigated acres and several municipal areas within the IID water service area shown on Figure 1. Of the water IID delivers, approximately 97 percent is used for agricultural purposes. The remaining three percent of its water deliveries supplies seven municipalities, one private water company and two community water systems as well as a variety of industrial uses and rural homes or businesses (www.iid.com).

2.2 Need for Equitable Distribution

During the period 1994-2002, the District diverted an average of about 3.2 MAF annually from the Colorado River, including the amount of water transferred to the Metropolitan Water District (MWD) under the 1988 IID/MWD Water Transfer Agreement. Under the QSA, approved in October 2003, the District's total annual diversions of Colorado River water under Priority 3 are now capped at 3.1 MAF including the amount of water transferred pursuant to the 1988 IID/MWD Water Transfer Agreement and the amount of water transferred to San Diego County Water Authority, Coachella Valley Water District, and/or MWD under the QSA.
Figure 1
IID Water Service Area
Equitable Distribution Plan

Source:
University of Redlands 1999; DOI 1999; and Reclamation 1999

IID WATER SERVICE AREA
\- AQUIEDUCT/CANAL
\- COUNTY LINE
\- INTERSTATE HIGHWAY
\- REGIONAL HIGHWAY
\- INTERNATIONAL BORDER
\- RIVER
\- CITIES

SCALE IS APPROXIMATE

5  0  5 Miles

US MEXICO

Salton City
Niland
Calipatria
Brawley
Holtville
Ocotillo
Oxnard
Mexicali

5

RIVERSIDE CO
IMPERIAL CO
Agricultural water use in Imperial Valley is inherently variable because of unpredictable variation in environmental factors such as rainfall, the salinity of Colorado River water at Imperial Dam, the incidence of pests, and economic factors such as commodity prices, production costs and changes in cropping patterns. In the past, there have been year-to-year swings in total agricultural water use on the order of 25,000-50,000 AF, and sometimes as much as 100,000 AF or more.

Municipal and industrial (M&I) water uses account for a very small proportion of total water use within the District (less than 3%), however there has been an increase in the rate of residential development in the last couple of years. Between 2004 and 2005, the Imperial Valley population grew by 3%, making it the sixth fastest growing county in the state during that period. The conversion of agricultural lands to urban uses could ultimately lead to a reduction in total water use depending on the types of developments and the implementation of urban water conservation best management practices. However, the increase in urbanized areas within the IID water service area could increase annual water demand within the District if the lands being developed have been idle and not actively farmed in the years prior to development.

If a very severe drought were to occur in the Colorado River Basin, existing statutes and anticipated shortage criteria would require a reduction in diversion of Colorado River water by permit holders with junior water rights and implementation of contractual shortage-sharing provisions of the QSA triggered by a reduced supply of Colorado River water. While IID’s senior water rights minimize the likelihood of its entitlement being immediately affected, it is not unreasonable to assume that a shortage-sharing scenario could be proposed for California water users (including IID) under extreme or extended shortage conditions where diverters with junior water rights have already been reduced.

In addition, steady climate warming, earlier occurrences and shorter periods of snowmelt, and shrinking snow pack have contributed to reduced water runoff from the mountains in the Colorado River Basin. Coupled with a fully-allocated Colorado River system, increased water user demands, and historically low reservoir storage elevations, it is possible that a drought sufficient to trigger some reduction in the District’s supply of Colorado River water could occur in the future.

A recent simulation analysis conducted for the District takes the actual levels of water use observed in the District over the period 1987-1998 and translates them to the 75-year period 1925-99 based on the weather conditions in those years compared to those in 1987-1998, assuming current cropping patterns and market conditions. Over the 75-year simulation period, in 52% of the years, demand is projected to exceed the 3.1 MAF cap. The overruns range from 44,000 to 212,800 AF, with an average of 114,000 AF. This could increase if market conditions favor crops with more intensive water needs. (Hanemann 2006)

Given all these factors, simulations predict that IID could face an SDI situation 4 or 5 times in the next 10 years. Moreover, it is also likely that SDI situations could occur back-to-back, resulting in a need to implement an Equitable Distribution Plan for two or more years in a row.
2.3 Equitable Distribution Plan

The four key objectives of the Equitable Distribution Plan proposed by IID are as follows:

- Ensure equity
- Provide certainty for water users
- Provide flexibility for water users
- Preserve the vitality of the local economy.

Under the proposed Equitable Distribution Plan, during, or not later than, October of each year, IID staff will forecast water demand and available supply for the following year and make a recommendation regarding the risk of water user demands exceeding available supply for the following calendar year. If the staff analysis concludes that forecasted water user demands will exceed the annual supply, then a Supply Demand Imbalance (SDI) will be recommended. Declaration of an SDI situation requires implementation of allocation of water pursuant to the Equitable Distribution Plan for the following year. If demand is not predicted to exceed supply, then Equitable Distribution is not needed for the following year. The SDI determination can be revisited at any time during the year to determine if Equitable Distribution should continue or be suspended for the remaining months of the year.

2.3.1 Apportionment by Water User Type

In the IID water service area, agricultural lands cultivating vegetables and field crops currently account for about 90% of the water use. Permanent crops account for an additional 6%. The remaining 4% is divided between municipal, industrial and miscellaneous uses. The Equitable Distribution Plan acknowledges that some groups may warrant lesser cutbacks than others. For some users, such as industrial users, permanent crops and dairies, a cutback in water deliveries has the potential to result in greater economic harm compared to other users. In addition, cutbacks to some user types such as municipal users, which account for only 3% of the total current water demand, may be costly to implement, but provide only a very minor contribution to reducing the overall water demand. In the event of an SDI, the proposed Equitable Distribution Plan would allocate the available water supply to water user accounts based on the following water use categories:

- System Losses – Annual Estimated Loss in AF
- Supply of Last Resort – Set Amount or percentage of total supply in AF
- Municipal Users – AF per Capita
- Industrial Users – Contracted Amount in AF
- Feed Lots – AF per animal
- Permanent Crops – Acre Feet based on Crop Needs
- Agricultural Lands per Acre – Straight Line Apportionment: Remaining Supply divided by authorized total acres
The amount or unit amounts for each of these water use categories will be set by the Board of Directors each year an SDI is declared.

Prior to allocating water to water users, under the Equitable Distribution Plan, water would be set aside from the total available supply to account for water attributed to system losses and the Supply of Last Resort as described below.

**System Losses**: Each year a quantity of water (on the order of 179,000 – 445,000 AF/year) is "lost" throughout the IID water delivery system and unavailable for use by water consumers in the District. System losses occur due to seepage, evaporation, and operational losses.

**Supply of Last Resort**: Under the Equitable Distribution Plan, if an SDI is declared, IID would set aside a specified volume of its annual entitlement as a Supply of Last Resort. The set aside amount would be determined each year based on the supply and demand conditions. If any water user is in desperate need of water, an application to an IID water user committee can be made and if determined to be a critical need, an allocation from the Supply of Last Resort will be approved by an IID water user committee. If approved, the amount of the approved request would be credited to the proper water account in the Water Order Entry System.

The various water user types and proposed method of allocation under the Equitable Distribution Plan are described below.

**Municipal Users**: Imperial Valley contains a large and growing urban population, most of which is served by retail water agencies who obtain their raw water supply from the District. The water agencies treat the water and distribute it to the population within their service areas for residential, commercial, industrial and public uses. For urban water agencies, the Equitable Distribution Plan assumes that the unit for apportionment is the number of people served by the agencies. The allotted per capita water use factor, in gallons per capita per day (gpcd), would be applied to the current service population based on the historic per capita amount. Currently, water use varies significantly among different urban agencies reflecting (1) differences in the balance of residential, commercial, industrial and public uses in each town and (2) differences in the residential density, lot size, building vintage and landscaping. For this reason, the same per capita water use factor will not currently be applied to each urban water agency. However, in order to be equitable, and to provide a level playing field for the location of future new urban developments in the Valley, it is important that new urban developments be held to equivalent water use standards that require implementation of urban water conservation best management practices by the appropriate entities. Therefore, when an SDI is declared, under the Equitable Distribution Plan, cities will receive a base amount that is calculated based on existing per capita use plus a per capita amount for new development that is based on a valley-wide average.

**Industrial Users**: Industrial users within the IID water service area include geothermal facilities, food processing facilities, manufacturing plants, etc. These users hold existing contracts within IID to receive a specified amount of water that is based on the requirements..
specific to their industry and are based on reasonable use. In the event of an SDI, to avoid significant economic harm to these industries, the Equitable Distribution Plan includes continuing to provide these users with the contracted amount in acre feet.

**Feed Lots:** Within the IID water service area, there are approximately 35 feed lots with approximately 600,000 head of cattle and sheep combined. In the event that an SDI is declared, feed lots would be apportioned an amount of water based on the specific requirements of the animals on an acre feet per animal basis to avoid any economic harm.

**Agricultural Lands.** Total agricultural water use accounts for about 96% of all water use in the Imperial Valley. The District divides agricultural uses into three broad categories: field crops, vegetables, and permanent crops. Permanent crops account for about 6% of the water use in the District. Field crops and vegetables together account for about 90% of total water use. In 2005 there were 366,963 acres devoted to field crops, 94,751 acres devoted to vegetables.

- **Permanent Crops:** Because of the potential for economic harm if a permanent crop does not receive adequate water, under an SDI situation this water use type would be allocated water on a crop water need basis. This approach allocates water to a field based on the reasonable water requirements for the specific crops and field conditions.

- **Other Agricultural Lands:** All other agricultural lands (90% of total water use) that have been paying the water availability fee would be allocated water based on Straight Line Method (SLM) of apportionment. Under SLM, the remaining water supply after all other users (above) have been allocated their allotment would be divided among these agricultural lands in an equal per-acre amount. In addition, these agricultural users would be eligible to participate in an internal water exchange program as described below. State and federal refuges within the IID water service area that currently receive water from IID are included in this water use category and would receive water in an SDI based on the SLM. In addition, any areas within the IID water service area that receive water to support resources required under environmental permits issued to IID are also included in this category.

2.3.2 **Internal Exchange Program for Agricultural Water Users**

Most water districts in California allow users to exchange water within the district subject to the district’s approval. This strategy is referred to as an internal water exchange. Districts that allow internal water exchanges do so for two reasons: it provides flexibility for their water users, and it simplifies the administration of water allocation for the district. Further, internal water exchanges are more common among water districts, such as IID, which have little or no storage for banking water. Under the Equitable Distribution Plan, internal exchanges will be permitted for agricultural purposes within the District with the same reasonable and beneficial use restrictions currently in effect.
The proposed Equitable Distribution Plan for IID includes an internal water exchange program with the following general requirements:

- Parties wanting to exchange water must submit an application to IID for approval.
- Based on exchange criteria (maximum, minimum and beneficial use) IID approves or denies application.
- If application is approved, the volume of the approved exchange is credited and/or debited to the proper water accounts in IID’s accounting system.
- There will be a limit on the maximum amount of water per acre that can be transferred off a field.
- There will be a limit on the maximum amount of water per acre that can be acquired.
- There may be restrictions on the timing and frequency of transfers.
- Urban and industrial users will not be participants in the water exchange program but are eligible to acquire water from the Supply of Last Resort.

2.3.4 Flexibility of the Equitable Distribution Plan

The Equitable Distribution Plan is designed to be flexible in order to meet the changing circumstances in supply and demand. In years when an SDI is declared, the Equitable Distribution Plan will be defined by applying the methodology described above based on the extent to which demand exceeds supply in each particular year. Each year that an SDI is declared, allotments will be reviewed and revised if necessary and the following set points will be determined:

1) Amount of total supply to be set aside for the Supply of Last Resort
2) Maximum amount that can be transferred from an account under the exchange program and restrictions on the timing and frequency of transfers
3) Minimum amount that must be retained by an account under the exchange program
4) Maximum amount that can be acquired by an account for beneficial use
5) System Loss Amount

The methodology described in the sections above is what is currently recommended based on existing knowledge of the District. However, as implementation proceeds, the Equitable Distribution Plan could be revisited and adjusted as needed.
2.3.5 Development of Equitable Distribution Plan

The proposed approach to the equitable distribution of water within the IID water service area was developed over the course of nearly one year of public meetings and facilitated discussions with local stakeholders. This stakeholder group referred to as the ED Work Group, was comprised of local agricultural, business and government leaders. The process also included a rigorous analysis of District records by the ED consultant in consultation with the ED Work Group and targeted stakeholder meetings with representatives from local public water systems, labor representatives, and agricultural advocacy organizations. Eight public workshops were held – two at the project outset, three to summarize draft findings, and three to present draft recommendations. More than 90 people attended the workshops, which were held in Brawley, El Centro and Calexico. Finally, the ED consultant has also presented his findings from Phases I and II of the ED project to the IID Board of Directors at regularly scheduled Board meetings, which are open to the public.

3. Existing Setting

3.1 Existing Delivery System

Up to now, IID has operated a demand-based water delivery system; water users have been able to place orders for the delivery of water and have these orders honored without limit and within canal capacity limitations as long as they are in good standing with respect to their payments to the District and as long as use is limited to that being necessary for reasonable and beneficial purposes. The District is rather unique in California in not previously allocating water in the sense of imposing a specific quantitative limit on the total amount of water available to individual water users over the course of a season. Most other water districts in California and in Colorado River Basin states do allocate water in this sense – that is, they do not have a purely demand-based delivery system. The main reason for the District’s distinctive water supply is the unique nature of its water rights as holder of one of the oldest and largest rights to water from the Colorado River. This is a very important economic asset which benefits landowners and water users throughout the District.

Under the demand-based water delivery system, as described above, during the period 1994-2002, the District consumed an average of about 3.2 MAF from the Colorado River, including the amount of water transferred to MWD under the 1988 MWD Water Transfer Agreement. Under the QSA, approved in October 2003, the District’s total consumption of Colorado River water under Priority 3 is now capped at 3.1 MAF. Therefore, in years when the projected water demand exceeds the available supply capped at 3.1 MAF, under the existing condition, there is currently no Board-approved approach to equitably distribute the available water supply. Section 22250 of the California Water Code requires districts to use the assessed value of their land as a percentage of the total assessed valuation of all lands served by the district as an apportionment method if no other method of apportionment is used.
Since adoption of the QSA in 2003 and imposition of the 3.1 cap on Priority 3 diversions of Colorado River water, water demand has not exceeded supply; therefore, the method of equitable distribution of available supplies without an adopted Equitable Distribution Plan has not been tested. The Board wishes to adopt an Equitable Distribution Plan in order to replace the statutory allocation method based on assessed value and to avoid uncertainty among users regarding the method of allocation.

3.2 Agricultural Water Use

As an irrigation district authorized under state law, IID delivers water for irrigation and domestic purposes within a service area consisting of about 500,000 acres in Imperial County. Historic trends of agricultural use in the region from 1950 through 2005 are shown on Figure 2. This figure shows both Total Net Acres of crops and Total Acres of crops, which includes multiple-cropped acreage. Because many of the fields within IID are double- and triple-cropped due to the year-round growing season, the Total Acres of Crops figure is higher.

![Figure 2: TOTAL NET ACRES AND TOTAL ACRES OF CROPS](image)

Within IID, the number of acres fallowed/idled at any time fluctuates as shown on Figure 3 below. In 2003, IID implemented a rotational fallowing program to create conserved water to deliver to the Salton Sea, as mitigation water for the Transfer Project, and for other purposes related to the Transfer Project. Over the next 11 years, under the approved QSA Delivery Schedule, fallowing will increase incrementally to a maximum of about 25,000 acres to provide conserved water for Transfer Project purposes. After 2017 (or sooner), it is anticipated that the use of fallowing as a conservation method will terminate and be
replaced with efficiency conservation to implement the Transfer Project. The increment of fallowing for the Transfer Project is also shown on Figure 3. To protect ongoing agriculture in the IID service area, the existing fallowing program allows a field participating in the program to be fallowed for a maximum of only 2 of every 4 years. Under the existing condition if an SDI were to occur, it is anticipated that additional lands could be idled or fallowed but that the amount would be well within the existing fluctuation of idled and fallowed lands. With the Equitable Distribution Plan, if an SDI is declared, the water exchange program would allow a redistribution of water that could reduce the amount of fields that would be fallowed.

3.3 Other Water Use

3.3.1 Municipal and Industrial Water Use

Currently, municipal water use accounts for about 3 percent of the total water use in the District. Municipal water use has been about 60,000 AF per year. Seven municipalities, one private water company and two community water systems treat the water and distribute it to the population within their service areas for residential, commercial, industrial and public uses. Water use varies significantly among different urban agencies reflecting differences in the balance of residential, commercial, industrial and public uses in each town and differences in the residential density, lot size, building vintage and landscaping. For example, in 2005, total urban use averaged about 201 gallons per capita per day (gpcd) in El Centro, 202 gpcd in Imperial, and 463 gpcd in Brawley. Part, but not all, of the difference may be due to the larger component of industrial water use in Brawley. Per capita residential water use is higher in Brawley than in the other two cities; Brawley has more trees and more outdoor landscaping than the other two cities. Another factor may be that Brawley does not have residential metering, although this is now being introduced.

Under the existing condition, in the event of an SDI, it is expected that municipal water users would be reduced in some pro rata manner consistent with the assessed value method provided for under State law.
Figure 3
FALLOW and IDLE ACREAGE
1991-2006

- Area farmable but not farmed: FALLOW
- Area farmable but between crops: IDLE
- IID Fallow Programs

Sep 2006
70,710
Idle Ac


7 Crop Chart 10
4. Initial Study of Environmental Impacts

The environmental factors checked below could be potentially affected by this project. See the checklist on the following pages for more details.

☐ Land Use and Planning ☐ Transportation/Circulation ☐ Public Services
☐ Population and Housing ☐ Biological Resources ☐ Utilities and Service Systems
☐ Geological Problems /Soils ☐ Energy and Mineral Resources ☐ Aesthetics
☐ Hydrology/Water Quality ☐ Hazards ☐ Cultural Resources
☐ Air Quality ☐ Noise ☐ Recreation
☐ Agriculture Resources ☐ Mandatory Findings of Significance
1. GEOLOGY AND SOILS. Would the project:

<table>
<thead>
<tr>
<th>Issues (and Supporting Information Sources)</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:</td>
<td>□</td>
<td>□</td>
<td>□</td>
<td>X</td>
</tr>
<tr>
<td>i) Rupture of a known earthquake fault, as delineated in the most recent Alquist-Prisco Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines &amp; Geology Special Publication 42.</td>
<td>□</td>
<td>□</td>
<td>□</td>
<td>X</td>
</tr>
<tr>
<td>ii) Strong seismic ground shaking?</td>
<td>□</td>
<td>□</td>
<td>□</td>
<td>X</td>
</tr>
<tr>
<td>iii) Seismic-related ground failure, including liquefaction?</td>
<td>□</td>
<td>□</td>
<td>□</td>
<td>X</td>
</tr>
<tr>
<td>iv) Landslides?</td>
<td>□</td>
<td>□</td>
<td>□</td>
<td>X</td>
</tr>
<tr>
<td>b) Result in substantial soil erosion or the loss of topsoil?</td>
<td>□</td>
<td>□</td>
<td>□</td>
<td>X</td>
</tr>
<tr>
<td>c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?</td>
<td>□</td>
<td>□</td>
<td>□</td>
<td>X</td>
</tr>
<tr>
<td>d) Be located on expansive soils, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?</td>
<td>□</td>
<td>□</td>
<td>□</td>
<td>X</td>
</tr>
<tr>
<td>e) Have soils incapable of adequately supporting the use of septic tanks or alternate wastewater disposal systems where sewers are not available for the disposal of wastewater?</td>
<td>□</td>
<td>□</td>
<td>□</td>
<td>X</td>
</tr>
</tbody>
</table>

**Discussion**

The proposed Equitable Distribution Plan (EDP) would not result in any impacts associated with geology and soils.

In years when an SDI is declared, the EDP could result in a minor change in cropping patterns or the numbers of acres idled/fallowed compared to years when there is an SDI and no EDP is in place; however, any differences are expected to be negligible and well within the range of typical fluctuations within the District. With the EDP, some farmers may choose to fallow lands in years when an SDI has been declared or to minimize multiple croppings which, if not properly mitigated, could result in soil erosion or the loss of topsoil. However, without an adopted EDP including a water exchange program, the existing condition could result in greater numbers of acres idled or fallowed. Under the EDP, the amount of fallowed lands is expected to be within the current range of fallowed lands in the IID water service area.

**Mitigation Measures**

None required.
2. AIR QUALITY. Would the project:

<table>
<thead>
<tr>
<th>Issues (and Supporting Information Sources)</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Conflict with or obstruct implementation of the applicable air quality plan?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒ X</td>
</tr>
<tr>
<td>b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒ X</td>
</tr>
<tr>
<td>c) Expose sensitive receptors to substantial pollutant concentrations?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒ X</td>
</tr>
<tr>
<td>d) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒ X</td>
</tr>
<tr>
<td>e) Create objectionable odors affecting a substantial number of people?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒ X</td>
</tr>
</tbody>
</table>

Discussion
The proposed EDP would not result in any impacts associated with air quality.

Implementation of the EDP could result in minor changes in the amount of water applied to some lands and in the location and amount of idled lands as water is exchanged within the IID water service area. However, the amount of those lands irrigated less or idled is expected to be similar to or less than under the existing condition under an SDI situation without an EDP. In addition, existing Imperial Air Pollution Control District air quality regulations (Rule 806 Conservation Management Practices) require application of best management practices on idled lands which would prevent air quality impacts.

Mitigation Measures
None required.

3. HYDROLOGY AND WATER QUALITY. Would the project:

<table>
<thead>
<tr>
<th>Issues (and Supporting Information Sources)</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Violate any water quality standards or waste discharge requirements?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒ X</td>
</tr>
<tr>
<td>b) 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)?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒ X</td>
</tr>
<tr>
<td>Issues (and Supporting Information Sources)</td>
<td>Potentially Significant Impact</td>
<td>Less Than Significant With Mitigation Incorporated</td>
<td>Less Than Significant Impact</td>
<td>No Impact</td>
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</tr>
<tr>
<td>c) Substantially alter the existing drainage pattern of the site, including through alteration of the course of a stream or river, or substantially increase the rate or volume of surface runoff in a manner that would:</td>
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</tr>
<tr>
<td>i) result in flooding on- or off-site</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>X</td>
</tr>
<tr>
<td>ii) create or contribute runoff water that would exceed the capacity of existing or planned stormwater discharge</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>X</td>
</tr>
<tr>
<td>iii) provide substantial additional sources of polluted runoff</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>X</td>
</tr>
<tr>
<td>iv) result in substantial erosion or siltation on- or off-site?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>X</td>
</tr>
<tr>
<td>d) Otherwise substantially degrade water quality?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>X</td>
</tr>
<tr>
<td>e) Place housing or other structures which would impede or re-direct flood flows within a 100-yr. flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>X</td>
</tr>
<tr>
<td>f) Expose people or structures to a significant risk of loss, injury, or death involving flooding:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>i) as a result of the failure of a dam or levee?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>X</td>
</tr>
<tr>
<td>ii) from inundation by seiche, tsunami, or mudflow?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>X</td>
</tr>
<tr>
<td>g) Would the change in the water volume and/or the pattern of seasonal flows in the affected watercourse result in:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>i) a significant cumulative reduction in the water supply downstream of the diversion?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>X</td>
</tr>
<tr>
<td>ii) a significant reduction in water supply, either on an annual or seasonal basis, to senior water right holders downstream of the diversion?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>X</td>
</tr>
<tr>
<td>iii) a significant reduction in the available aquatic habitat or riparian habitat for native species of plants and animals?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>X</td>
</tr>
<tr>
<td>iv) a significant change in seasonal water temperatures due to changes in the patterns of water flow in the stream?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>X</td>
</tr>
<tr>
<td>v) a substantial increase or threat from invasive, non-native plants and wildlife</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>X</td>
</tr>
<tr>
<td>h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>X</td>
</tr>
<tr>
<td>i) 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?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>X</td>
</tr>
<tr>
<td>j) Inundation by seiche, tsunami, or mudflow?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>X</td>
</tr>
</tbody>
</table>
**Discussion**

The proposed EDP would not result in any impacts associated with hydrology and water quality.

Implementation of the EDP and the associated water exchange program will not affect the total amount of water use in the District. Nonetheless, water exchanges between farmers could result in short-term changes in the location of water use throughout the IID water service area, potentially causing changes in the volume of flows in drains throughout the District. However, due to restrictions imposed in the water exchange program on the amount of water that can be transferred or acquired, the magnitude of any potential change is anticipated to be minimal and, due to constant variation in cropping patterns and locations of idled lands, most likely to be undetectable when compared to the existing condition.

**Mitigation Measures**

None required.

4. **BIOLOGICAL RESOURCES.** Would the project:

<table>
<thead>
<tr>
<th>Issues (and Supporting Information Sources)</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the DFG or USFWS?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the DFG or USFWS?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>c) Have a substantial adverse effect on federally-protected wetlands as defined by Section 404 of the federal Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption or other means?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory corridors, or impede the use of native wildlife nursery sites?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>
Discussion

Implementation of the EDP would not have an effect on any biological resources within the IID water service area. The EDP could result in minor short-term changes in the location of water use and therefore the volume of flows in the drains. However, any changes in locations of flows are expected to be both short-term and negligible, and well within historic variations, and therefore not to result in any adverse effects on biological resources that rely on the drains for habitat.

State and federal refuges within the IID water service area and other environmental areas (i.e. managed marsh) dependent on water supplies will be allocated water on a per acre basis in the event of an SDI, using the SLM method. These areas typically grow vegetation that has low consumptive use and include lands that are fallowed on a rotational basis; therefore, it is expected that under an SDI they will have sufficient supplies to maintain current uses and operations and/or to fulfill obligations under environmental permits issued to IID. No impacts to these areas will occur under the EDP.

Mitigation Measures

None required.

5. AGRICULTURAL RESOURCES. In determining whether impacts to agricultural resources are significant environmental impacts, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:

<table>
<thead>
<tr>
<th>Issues (and Supporting Information Sources)</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
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<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping &amp; Monitoring Program of the California Resources Agency, to non-agricultural uses?</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
</tr>
<tr>
<td>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
</tr>
<tr>
<td>c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
</tr>
</tbody>
</table>

Discussion

The predominant land use in the IID water service area is agriculture. Implementation of the EDP is intended to support the persistence of agricultural practices in the area by providing a method of water distribution under shortage conditions that is predictable, equitable and more flexible for agricultural resources than the statutory allocation method based on assessed value. The EDP would not result in any alterations to the existing environment.
that could result in conversion of farmland to non-agricultural use, compared to a scenario where an SDI occurs without an EDP in place to allocate available supplies.

The EDP is expected to be beneficial to agriculture by providing farmers with predictability regarding the method of allocation of available water supplies in years when demand exceeds supplies.

**Mitigation Measures**

None required.

6. NOISE. Would the project result in:

<table>
<thead>
<tr>
<th>Issues (and Supporting Information Sources)</th>
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<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) 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?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>X</td>
</tr>
<tr>
<td>b) Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>X</td>
</tr>
<tr>
<td>c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>X</td>
</tr>
<tr>
<td>d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>X</td>
</tr>
<tr>
<td>e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing in or working in the project area to excessive noise levels?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>X</td>
</tr>
<tr>
<td>f) For a project within the vicinity of a private airstrip, would the project expose people residing in or working in the project area to excessive noise levels?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>X</td>
</tr>
</tbody>
</table>

**Discussion**

The EDP would not result in any generation of noise.

**Mitigation Measures**

None required.

7. LAND USE AND PLANNING. Would the project:

<table>
<thead>
<tr>
<th>Issues (and Supporting Information Sources)</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Physically divide an established community?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>X</td>
</tr>
</tbody>
</table>
b) 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?

[Blank]

Less Than Significant Impact [Blank]

Less Than Significant Impact [Blank]

No Impact X

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

[Blank]

Less Than Significant Impact [Blank]

Less Than Significant Impact [Blank]

No Impact X

**Discussion**

Implementation of the EDP would not result in any land use impacts. It would not physically divide an established community or conflict with any established land use plan or policy. Because there are no adverse biological effects of the EDP or changes to the natural environment resulting from the EDP, it would not conflict with the IID Water Conservation and Transfer Project HCP/NCCP.

**Mitigation Measures**

None required.

8. **MINERAL RESOURCES.** Would the project:

<table>
<thead>
<tr>
<th>Issues (and Supporting Information Sources)</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a)  Result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State?</td>
<td>[Blank]</td>
<td>[Blank]</td>
<td>[Blank]</td>
<td>X</td>
</tr>
<tr>
<td>b)  Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?</td>
<td>[Blank]</td>
<td>[Blank]</td>
<td>[Blank]</td>
<td>X</td>
</tr>
</tbody>
</table>

**Discussion**

Implementation of the EDP would have no effect on mineral resources.

**Mitigation Measures**

None required.

9. **HAZARDS AND HAZARDOUS MATERIALS.** Would the project:

<table>
<thead>
<tr>
<th>Issues (and Supporting Information Sources)</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a)  Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</td>
<td>[Blank]</td>
<td>[Blank]</td>
<td>[Blank]</td>
<td>X</td>
</tr>
</tbody>
</table>
### Issues (and Supporting Information Sources)

<table>
<thead>
<tr>
<th>Potential Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
</table>

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

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?  
[ ] ☐  ☐  ☐  X

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

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

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?  
[ ] ☐  ☐  ☐  X

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?  
[ ] ☐  ☐  ☐  X

h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?  
[ ] ☐  ☐  ☐  X

### Discussion

Implementation of the EDP would have no impacts associated with hazards and hazardous materials. There would be no activities associated with the EDP that would interfere with existing emergency plans or increase fire risk.

### Mitigation Measures

None required.

### 10. POPULATION AND HOUSING

Would the project:

<table>
<thead>
<tr>
<th>Potential Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
</table>

a) Induce substantial population growth in an area either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?  
[ ] ☐  ☐  ☐  X
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?  □ □ □ X

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?  □ □ □ X

Discussion
Implementation of the EDP will have no effect on population. In the event of an SDI, existing municipal water users will receive an allotment of water that is equivalent to their current per capita usage. Future development will receive an allotment based on the valley-wide average per capita usage that assumes implementation of urban water conservation best management practices as required by the Urban Water Management Act. These restrictions in water use in future developments in urban areas would likely occur in the absence of the EDP under an SDI; therefore, no impacts to population and housing are anticipated under the EDP.

Mitigation Measures
None required.

11. TRANSPORTATION/CIRCULATION. Would the project:

a) Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections)?  □ □ □ X

b) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?  □ □ □ X

c) Result in inadequate emergency access?  □ □ □ X

d) Result in inadequate parking capacity?  □ □ □ X

e) Exceed, either individually or cumulatively, a level-of-service standard established by the county congestion management agency for designated roads or highways?  □ □ □ X

f) Conflict with adopted policies supporting alternative transportation (e.g., bus turnouts, bicycle racks)?  □ □ □ X

g) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?  □ □ □ X
Discussion
Implementation of the EDP will have no effect on Transportation and Circulation. No additional trips will be generated, and no roads will be affected.

Mitigation Measures
None required.

12. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service rations, response times or other performance objectives for any of the public services:

<table>
<thead>
<tr>
<th>Issues (and Supporting Information Sources)</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Fire protection?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>b) Police protection?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>c) Schools?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>d) Parks?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>e) Other public facilities?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

Discussion
The potential for an SDI situation is the same with or without the EDP. Impacts to fire protection are not anticipated as existing municipal users will receive a per capita allotment of water under the EDP that is sufficient for public health and safety purposes. A valley-wide standard will be applied to new development; however, it is anticipated that this standard will be sufficient to maintain acceptable service rations. The project will not result in an increased need for public services; therefore, no impacts to public services are anticipated.

Mitigation Measures
None required.

13. UTILITIES AND SERVICE SYSTEMS. Would the project:

<table>
<thead>
<tr>
<th>Issues (and Supporting Information Sources)</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>Issues (and Supporting Information Sources)</td>
<td>Potentially Significant Impact</td>
<td>Less Than Significant With Mitigation Incorporated</td>
<td>Less Than Significant Impact</td>
<td>No Impact</td>
</tr>
<tr>
<td>--------------------------------------------</td>
<td>-------------------------------</td>
<td>-----------------------------------------------</td>
<td>-----------------------------</td>
<td>----------</td>
</tr>
<tr>
<td>b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>e) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>f) Be served by a landfill with sufficient Permitted capacity to accommodate the project’s solid waste disposal needs?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>g) Comply with federal, state, and local statutes and regulations related to solid waste?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

**Discussion**

Under the EDP, in the event of an SDI, existing municipal users would be unaffected as they would receive the same amount of water that they have used historically on a per capita basis. All future development, regardless of city supply, would be subject to the same valley-wide use allotment as determined annually by the Board of Directors, based on the use of water conservation best management practices. The EDP will not result in the need for any additional wastewater, water or solid waste facilities. Because the allotment provided to existing municipal users is based on historic use it will not result in impacts to public utilities or services to existing development. Future developments will be required to consider the valley-wide per capita use prior to construction and thus will incorporate best management practices to avoid impacts during an SDI.

**Mitigation Measures**

None required.

14. **AESTHETICS.** Would the project:

<table>
<thead>
<tr>
<th>Issues (and Supporting Information Sources)</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Have a substantial adverse effect on a scenic vista?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>
Issues (and Supporting Information Sources) | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact
---|---|---|---|---
c) Substantially degrade the existing visual character or quality of the site and its surroundings? | ☐ | ☐ | ☐ | ☒
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area? | ☐ | ☐ | ☐ | ☒

**Discussion**

Implementation of the EDP will have no effect on existing aesthetic resources in the IID water service area. Although there is the possibility that cropping patterns and/or locations of idled lands may change during an SDI under the EDP, any changes would be minor and fully within the existing fluctuation of cropping patterns in the District.

**Mitigation Measures**

None required.

15. **CULTURAL RESOURCES.** Would the project:

Issues (and Supporting Information Sources) | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact
---|---|---|---|---
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5? | ☐ | ☐ | ☐ | ☒
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5? | ☐ | ☐ | ☐ | ☒
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | ☐ | ☐ | ☐ | ☒
d) Disturb any human remains, including those interred outside of formal cemeteries? | ☐ | ☐ | ☐ | ☒

**Discussion**

No construction is anticipated to result from implementation of the EDP; therefore, no effects to cultural resources will occur.

**Mitigation Measures**

None required.

16. **RECREATION.** Would the project:
<table>
<thead>
<tr>
<th>Issues (and Supporting Information Sources)</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

**Discussion**

Implementation of the EDP will not result in the increase of use of recreational facilities or include the construction of recreational facilities; therefore there are no impacts to recreational resources.

**Mitigation Measures**

None required.

**17. MANDATORY FINDINGS OF SIGNIFICANCE.**

<table>
<thead>
<tr>
<th>Issues (and Supporting Information Sources)</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>b) Does the project have impacts that are individually limited, but cumulatively considerable? (&quot;Cumulatively considerable&quot; means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>
Within IID, the number of acres fallowed/idled at any time fluctuates as shown on Figure 3 below. In 2003, IID implemented a rotational fallowing program to create conserved water to deliver to the Salton Sea, as mitigation water for the Transfer Project, and for other purposes related to the Transfer Project. Over the next 11 years, under the approved QSA Delivery Schedule, fallowing will increase incrementally to a maximum of about 25,000 acres to provide conserved water for Transfer Project purposes. After 2017 (or sooner), it is anticipated that the use of fallowing as a conservation method will terminate and be replaced with efficiency conservation to implement the Transfer Project. The increment of fallowing for the Transfer Project is also shown on Figure 3. To protect ongoing agriculture in the IID service area, the existing fallowing program allows a field participating in the program to be fallowed for a maximum of only 2 of every 4 years. Under the existing condition if an SDI were to occur, it is anticipated that additional lands could be idled or fallowed but that the amount would be well within the existing fluctuation of idled and fallowed lands. With the Equitable Distribution Plan, if an SDI is declared, the water exchange program would allow a redistribution of water that could reduce the amount of fields that would be fallowed.

**Discussion**

**a) Fish and Wildlife Species:**

Because implementation of the EDP would not result in any changes in the existing environment, no construction is proposed and no changes in drain flows beyond the existing fluctuation in drain flows would occur, the project does not have the potential to substantially degrade the environment, reduce the habitat of a fish or wildlife species or cause a fish or wildlife population to drop below self-sustaining levels. In addition, for the same reasons, the project would not threaten to eliminate a plant or animal community or reduce the number or restrict the range of a rare or endangered plant or animal species. Similarly, the proposed project would not eliminate important examples of the major periods of California history or prehistory.

**b) Cumulative Impacts:** Because there are no environmental impacts associated with implementation of the EDP, there are no cumulative impacts to consider.

**c) Humans:** The proposed project would not have a substantial or adverse effect on human beings.

Based on the above, IID has determined that the adoption of the Equitable Distribution Plan will not have any significant adverse environmental effects.
5. Determination

On the basis of this initial evaluation,

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. ☒

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent (see Appendix A). A NEGATIVE DECLARATION will be prepared. ☐

I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. ☐

I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. ☐

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (2) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. ☐

Prepared By:

[Signature]
Ms. Laura Harnish/Project Manager/CH2M HILL

Date: 11/20/06

Reviewed By: Lead Agency Representative

[Signature]
John Eckhardt, PhD.

Date: 11/20/06

Authority: Public Resources Code Sections 21063, 21084, 21084.1, and 21087.


(Form updated 4/12/2005)
6. Information Sources


7. List of Preparers

CH2M HILL project personnel included the following:

- Laura Harnish, Project Manager
- Alan Highstreet, Senior Reviewer