



**MEMORANDUM**

**THE IMPERIAL IRRIGATION DISTRICT AIR QUALITY MITIGATION PROGRAM  
SUMMARY AND ENVIRONMENTAL PROCESS**

PREPARED FOR: Bruce Wilcox, IID

PREPARED BY: Ken MacDonald, NewFields  
Andrea Schmid, NewFields

COPIES: John Dickey, NewFields  
Brian Schmid, NewFields  
Mike Urkov, NewFields

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The Imperial Irrigation District (IID) Water Transfer Project includes transfer of up to 300,000 acre-feet of water annually from IID to the San Diego County Water Authority, Coachella Valley Water District, and Metropolitan Water District of Southern California. The water transfer was evaluated in the Final Environmental Impact Report and Environmental Impact Statement (Water Transfer EIR/EIS) for the IID Water Conservation and Transfer Project and Habitat Conservation Plan (HCP). The Water Transfer EIR/EIS was certified by IID, as the lead agency under the California Environmental Quality Act (CEQA), in June 2002.

The water transfer, along with other factors affecting Salton Sea inflows and water balance, will result in gradual exposure of large expanses of the Salton Sea floor. The Water Transfer EIR/EIS requires IID to develop and implement an air quality mitigation plan to address dust emissions from the exposed dry lakebed (playa). IID has developed an Air Quality Mitigation Program (AQ Program) to fulfill this requirement. The AQ Program focuses on the potential for and mitigation of particulate matter with a diameter of 10 micrometers or less (PM10, also referred to herein as “dust”). These dust particles (approximately 1/7th the thickness of a human hair) are small enough to be inhaled, and represent a potential human health risk.

The purpose of this memo is to summarize the AQ Program and the process to evaluate potential environmental impacts associated with its implementation. In general, the process includes evaluating the AQ Program with an Initial Study checklist using the significance criteria used in the Water Transfer EIR/EIS. The purpose of the evaluation(s) is to determine whether there are any new significant impacts or a substantial increase in the severity of a previously identified significant impact; and accordingly, whether additional CEQA documentation is required for the Water Transfer Project.

The currently known components of the AQ Program (i.e., pilot projects) are evaluated in an Initial Study checklist that is attached to this memo. Other components of the AQ Program (i.e., playa traffic management) will be evaluated when the complete project descriptions are available. It is understood that the elements of the AQ Program will evolve over time and it is anticipated that

environmental review may be needed periodically. A table of potential permits required for the AQ Program is included in Attachment 1.

## **1 SUMMARY OF AIR QUALITY MITIGATION PROGRAM**

The purpose of the AQ Program is to understand and control playa emissions associated with the Water Transfer Project. The AQ Program generally includes three elements: first, mapping and monitoring to inform the “where, when, why, and how much” of emissions from the playa and areas surrounding the playa; second, dust control pilot projects to inform control efforts to limit emissions from the playa; and third, coordination with regulatory agencies to evaluate emission and dust control data and to inform decisions about long-term dust control mitigation.

The following sections summarize each AQ Program element in more detail:

- Section 1.1 Mapping and Monitoring
- Section 1.2 Pilot Dust Control Projects
- Section 1.3 Coordination and Decision Making

### **1.1 MAPPING AND MONITORING**

The purpose of the mapping and monitoring element is to understand the “where, when, why, and how much” of emissions from the playa. The following sections outline the general methodology for answering these questions. Extensive surface mapping and source monitoring methodology have been developed for dust control at Owens Lake and for other arid lands. These existing methodologies will be adapted for local use and modified as needed to meet the changing needs of the AQ Program over time. Currently, the methodology includes the following elements:

#### **1.1.1 MAPPING AND MONITORING ON THE PLAYA**

##### **MAP PLAYA EXTENT**

This element includes mapping the extent of exposed playa. Playa extent has been mapped for seven dates since 2000. Playa extent will continue to be mapped periodically using remote sensing technology.

##### **PLAYA AND CLIMATIC TRIGGER CHARACTERIZATION**

This element includes characterizing how different crust types respond to climatic triggers. It includes comparing meteorological data (i.e., wind, temperature, relative humidity) and source monitoring data (i.e., field data from monitoring stations). This is a key to understanding the timing of periods when the playa is most vulnerable to accelerated wind erosion. For example, it is generally understood that playas dominated by sulfate and carbonate salts tend to soften when subjected to low temperature and high relative humidity. These conditions occur infrequently at the Salton Sea, but it is possible that widespread, elevated emissions during such periods could result in exceedance of PM10 standards.

##### **PLAYA SURFACE MAPPING**

As the Salton Sea recedes, the surface of the playa will be exposed. Various salt crust types, having various hardness, relief, and PM10 emissions rates will develop. This element includes mapping playa surfaces to understand the spatial distribution of emission sources. Playa surfaces will be mapped based on remote sensing data validated by field observations.

## **PLAYA SOURCE MONITORING**

Source monitoring includes aerometric monitoring to determine the location and degree of emissions from different areas on the playa. This monitoring site is done with meteorological towers, sand catchers, and Sensits. Actual instrumentation may vary, but measurement of meteorological conditions and sand motion will in any case be measured. Once emissive areas are identified, the impact of these emissions can be evaluated decide whether additional temporary and/or permanent dust control is needed.

### **1.1.2 MAPPING AND MONITORING OFF THE PLAYA**

To accurately manage playa emissions associated with the Water Transfer, it is important to understand conditions influencing ambient air quality at the Salton Sea. The following elements influence background ambient air quality conditions at the Salton Sea:

#### **BACKGROUND SURFACE MAPPING**

Background surface mapping is similar to playa surface mapping, but it includes mapping background surfaces (i.e., close to, *but not on the playa*) to understand the location of potentially emissive surfaces adjacent to the Salton Sea. Background surface mapping will feed into PM10 emissions modeling that may be done to determine the importance of various sources and needs for additional emissions control.

#### **BACKGROUND SOURCE MONITORING**

Background source monitoring is similar to playa source monitoring, but it includes air quality monitoring of background sources (i.e., close to, *but not on the playa*) to understand potential emission sources adjacent to the Salton Sea. Background source monitoring will feed into PM10 emissions modeling.

#### **AMBIENT AIR QUALITY MONITORING NETWORK**

The objective of the ambient air quality monitoring network is to characterize ambient air quality conditions at the Salton Sea. Environmental compliance for installation of the monitoring network is complete and the network is currently under construction. It is comprised of six air quality monitoring stations located around the Salton Sea. Data collected from the network also be employed in modeling to characterize ambient air quality relationships in greater detail.

## **1.2 PILOT PROJECTS**

Another element of the AQ Program is research and development of practical, water-efficient, dust control measures (DCMs). DCMs like these will help meet requirements of the Clean Air Act and form part of the control strategy in the eventual state implementation plans (SIPs) for PM10 in the Salton Sea Basin. Pilot field testing will allow IID to gain experience and understanding of novel, locally-adapted methods of dust control and the site-specific factors that could affect their feasibility and cost.

IID plans to proceed with up to five DCM pilot studies. The sites of these studies will represent future playa conditions. They will be screened according to factors influencing their suitability, including, but not limited to: land ownership, evident permitting challenges, compatibility with anticipated operations, and potential future uses of the land. The selection of these DCMs is based on previous experience and existing literature on large-scale playa dust control. Some of the guiding principles for DCM selection include:

- *Effective dust control is achieved by a combination of factors.* These factors include the following:
  - Physical stabilization of the playa surface (i.e., particles cohere more strongly when the soil is wetted or cemented together into a stable crust).
  - Reduction in wind velocity at the playa surface (i.e., obstructing wind with plant or gravel cover, or with intermittent, larger obstructions, such as windbreaks or sand fences, reduces sand flux and resulting erosion rates).
  - Enhanced net-sand capture rates (i.e., sand settles more readily under reduced wind velocities and/or if it coheres to a wetted surface).
  
- *DCMs should enable constant dust control.* Control methods are strongly affected by the nature of the Clean Air Act, which requires that local air quality management agencies develop SIPs to attain national ambient air quality standards (NAAQS) with extremely rare (normally a maximum of twice-per-year) exceptions due to natural events. Climatic conditions causing dust storms, though relatively rare, have the potential to occur over relatively long periods (months) and over large expanses. This results in a much more extensive and constant need for control than might be required if only a fixed proportion of baseline emissions were required to be abated.
  
- *Dust control should be based on achieving target levels of emission control on a preventive, macro scale, not a reactive, micro scale.* Limiting dust control to confronting imminent threats to air quality is ineffective and expensive. By the time a threat is identified, a geographically-small emission problem may have already spread over a larger area (i.e., caused previously stable areas to begin emitting), thus increasing the footprint of the required control area (likely in perpetuity). Also, locating areas that require immediate control in the midst of a vast playa entails substantial monitoring, analysis, and cost. Lastly, if control is installed early, then simpler, less costly approaches may serve well to prevent the spread of emissive areas; where control is installed after the fact, it often must be more intensive and costly to halt erosion from chronic (i.e., fragile) source areas.
  
- *Water-based DCMs are effective, but are generally inefficient from a cost, water supply, and water-use standpoint.* Water-based controls are dependent on sufficient water supply to maintain widespread surface wetness throughout potentially-emissive periods. DCM water use competes with other uses of inflows to the Sea (i.e., maintaining Sea elevation, supporting Sea restoration, or supporting vegetation-based dust control). Water-efficient or waterless DCMs are favored.
  
- *DCMs that are designed to interrupt wind fetch and saltation protect downwind surfaces and capture sand.* This approach indirectly controls land surfaces between control strips (i.e., vegetation, ditches, or berms) and no water, construction, or operations effort is required for areas that are incidentally protected. This can result in greater cost and water efficiency. The layout of control strips should be designed so that the most frequent and intense winds are obstructed at a spacing that results in the whole area achieving target levels of dust control. Spacing and orientation will vary depending on local playa conditions and other constraints.
  
- *DCMs with salt- and drought-tolerant vegetation can be challenging to establish and sustain, but are generally water efficient and provide effective dust control.* Although water is required for establishment and maintenance of vegetation, dust control persists beyond

irrigation events and irrigation seasons, because control is effected by vegetation and not water.

Based on these guidelines, five DCMs were identified for near-term pilot testing, and are described in more detail in the following sections. These DCMs include: habitat swales, moat and row, water-efficient vegetation, native plant community enhancement, and tillage.

### 1.2.1 HABITAT SWALES

Habitat swales are vegetated, earthen channels constructed by raising pairs of parallel berms approximately 60 feet apart, with adjacent pairs of berms spaced three to nine times that distance from one another. Figure 1 illustrates a conceptual habitat swale. Habitat swales operate on the principle of interrupting fetch (distance of uninterrupted wind travel distance) across the playa, leading to reduced wind velocity at the playa surface and reduced sand flux. After vegetation is established, swales also function as a sink for mobile sand, capturing sand that blows into a swale and immobilizing it beneath the plant community's canopy. Swales thus control dust emissions from the swale and inter-swale surfaces.

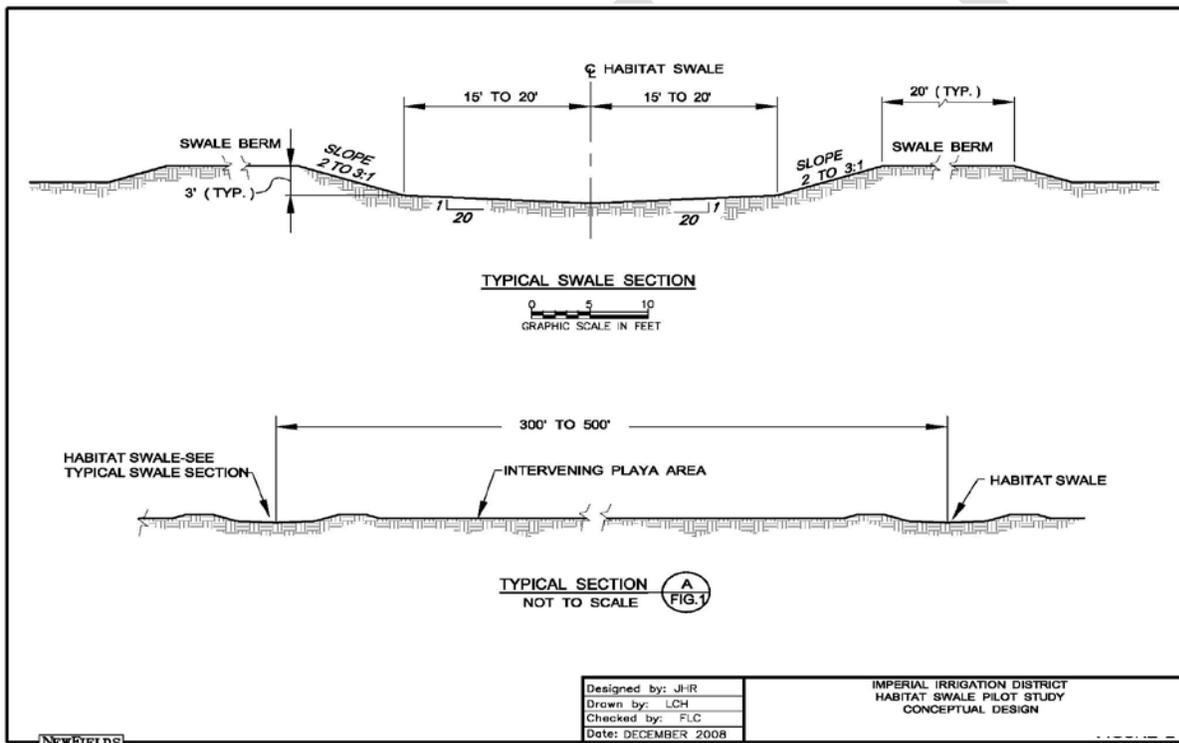


Figure 1.  
*Habitat Swale Cross-Section Conceptual Design*

#### CONFIGURATION

As described above, swales will consist of parallel berms approximately 60 feet apart. The swales will be designed with a 30- to 40-ft bottom width and four feet total depth. The top width of each earthen side berm will be approximately 20 feet and the top of the berm, standing approximately two feet above existing grade. The configuration of the swales will be refined during design based on site-specific investigations (i.e., topography, surface erosion potential, primary wind direction) and desired dust control efficiency. The swales and berms will be constructed from local, on-site materials and import/borrow soil or disposal of excess fill will be minimized.

Channel lengths and profile gradients will depend on site topography, but in general will be designed so that pulsed irrigation flows can be sustained along the full length of the swale without requiring excessively large and erosive flows at the head end. Given the relatively level topography of the sea floor (and therefore exposed Playa in the future), longitudinal profile gradients are expected to be low. The swale cross-section will be sloped toward the center, where there will be a low-flow channel to provide drainage. Swale tailwater will be recycled for other uses or will flow to the Sea. Analysis of soil wind and water erosion potential will be conducted during the design phase and will help to determine adequate design criteria.

To achieve regional reductions in sand motion, and thus dust emissions, a network of swales (as described above) will be constructed at intervals of 200 to 500 feet, with traffic being avoided to the maximum extent feasible on the intervening playa. A combination of natural crusting, regional reduction in sand motion, and reduced surface wind velocities due to sheltering of areas downwind of the swales result in dust control over the entire swale and inter-swale area. Final swale spacing will be determined during the design phase as a function of topography, surface erosion potential, primary wind direction, and desired dust control efficiency targets.

### **VEGETATION**

Swale cross-sections would mimic natural channels, in which pulsed flow would spread laterally from the cross-section's low point. This favors development of a broad swath of vegetation, ranging from hydrophytic near the centerline to xeric and halophytic along the margins. Plant species will be selected based on suitability for range of the hydrologic regime and saline soil conditions of the site and location along the length of the swale (i.e., wetter conditions on the swale bottom and upstream; drier, more saline conditions on the swale margins and downstream). In general, species will include sedges, rushes, and similar wetland vegetation located in the bottom and head end of the swale; grasses and other herbaceous species on both sides and downstream reaches of the swale; and shrub species up to the boundaries of anticipated swale seepage. Rhizomatous species should predominate in the swale because they increase the likelihood of re-establishment during long-term maintenance/management without the need for extensive re-planting. Vegetative cover within the swale will be established quickly, with gradual succession to more diverse native species. Stands of vegetation will provide ecological benefits (i.e., microhabitats) similar in character to desert wetlands and xeric native desert vegetation. This vegetation approach tends to discourage (but does not eliminate) establishment of invasive species, such as Tamarisk.

### **OPERATION**

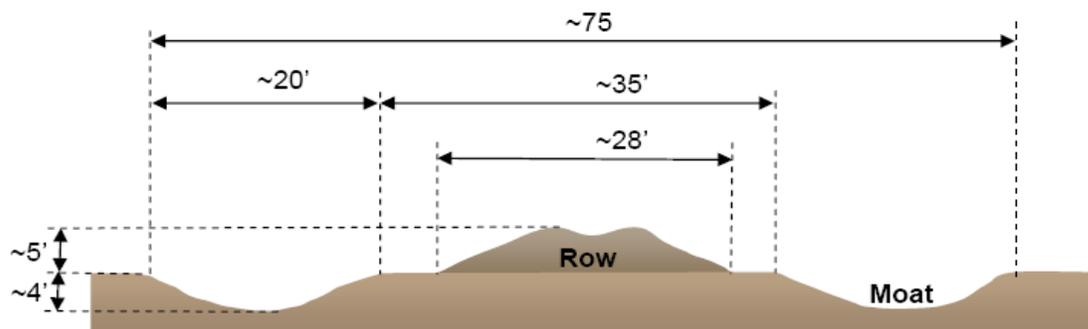
The swales will be irrigated by pulse irrigation to shorten water's residence/travel time and therefore minimize stagnant water in the swales. During establishment, drain water (inflows to the Sea) would be pulsed through each swale bi-weekly. As vegetation is established, inflows will likely be reduced to a frequency of every few weeks, or longer, as needed to maintain vegetative growth. After establishment, water would be pulsed through each swale five to 12 times annually. The timing and duration of the pulses will be a function of inflow availability, soil conditions, and plant irrigation needs. Irrigation frequency and duration will be evaluated during design and the pilot study. Water flow into each swale will be controlled with slide gates. Open-channel flow will be measured near each gate structure to measure flows entering each swale. The number of swales that can be irrigated simultaneously will be determined by balancing the required flow rate with the available inflow supply. Details regarding flows into the swales such as amount of flow, cycle times, cutoff time, and other parameters will be developed during the final design phase.

Tractor and backhoe/excavation (mainly tracked) equipment will be used during construction and operation of the swales and irrigation systems; lighter, wheeled equipment may be employed for planting/maintenance of vegetation. Intermittent tractor and/or backhoe access will be required

during the maintenance activities including, but not limited to cultivation and weed control. Intermediate access between periods of maintenance will likely be by small utility four-track vehicles.

### 1.2.2 MOAT AND ROW

Moat and row (MR) consists of an array of earthen berms (rows) about five feet high with sloping sides, flanked on either side by ditches (moats) about four feet deep (Figure 2). Moats control dust by capturing moving sand, and rows physically shelter the downwind playa by lifting wind streams and reducing wind velocity at the playa surface. Moats and rows are constructed in a serpentine layout across the playa surface, curving to run perpendicular to primary wind vectors. Dust control effectiveness can be enhanced by reducing distance between rows or combining MR with vegetation, water, gravel, sand fences, or similar methods to enhance sand capture and/or sheltering of downwind areas.



**Figure 2.**  
*Conceptual Cross-Section of a Moat and Row Dust Control Measure*

#### CONFIGURATION

Moats and rows are generally parallel to one another and spaced at variable intervals so that fetch between rows is not conducive to unacceptable levels of dust emission. Spacing can vary depending on the surface type, the control effectiveness required, or exposure to and capture of sand coming from offsite. Previous experience indicates that MR spacing will generally vary from 250 to 1,000 feet. Spacing of MR elements is interdependent with cross-section design criteria (e.g., taller elements that shelter longer downwind fetches can be more widely spaced).

#### OPERATION

During operation the MR array may need to be altered, improved, or maintained to achieve the required level of dust control. The extent, nature, and timing of these operational activities will be determined by monitoring results. Operational activities may include the following:

1. Construction of additional, intermediate moats and rows;
2. Repair of existing moats and rows, mainly through excavation of adjacent playa to form new moats, and burial of sand-filled MR margins with spoil, effectively fattening the original row in the repaired section;
3. Addition of sand fences to increase row height or to enclose the site along an unprotected margin;
4. Watering of moats or area between MR elements;

5. Irrigation and planting of vegetation on rows or area between MR elements; and
6. Gravel armoring along the tops of rows to prevent erosion of the row.

### **1.2.3 WATER EFFICIENT VEGETATION**

This DCM includes vegetating playa surfaces with salt- and drought-tolerant species that stabilize and suppress soil and sand movement below their canopies, thus providing dust control. Water-efficient vegetation pilot tests will be conducted to assess the effect of different levels of infrastructure, vegetation density and uniformity on dust control efficiency, as well as water use and cost efficiency.

A version of this measure was employed in the Ecosystem Restoration Plan (Appendix H) as the “placeholder” technical approach to dust mitigation. That description, and the associated costs, assumed a high level of infrastructure that had proven necessary to achieve high levels of saltgrass cover initially required by regulators at Owens Lake. The species mix, cover levels, and infrastructure tested, and ultimately used, on the Salton Sea playa could be far lower, corresponding to site-specific dust control, soil, drainage, and plant ecological conditions.

#### **CONFIGURATION AND VEGETATION**

Vegetation will be seeded or planted on raised beds one to three feet high and spaced five to 15 feet apart (center-to-center). Previous work on dry, saline playas suggests that the most desirable species for dust control are salt- and drought-tolerant, rhizomatous, and provide adequate cover even during dormant periods. Saltgrass (*Distichlis spicata*) is one suitable species. Native shrubs, such as salt bushes (*Atriplex* spp.), greasewood (*Sarcobatus vermiculatus*), and seepweed (*Sueada moquinii*) may also be used alone or in combination with saltgrass. A mix of native species will provide the needed diversity to maintain adequate cover levels, reduce water demand, and suppress invasive species. Species diversity will also allow better cover within the vegetated areas because different species can occupy different microhabitats. This vegetation approach tends to exclude (but does not eliminate) invasive species, such as Tamarisk.

#### **OPERATION**

Flood, pulse, or drip irrigation will be used to meet plant water demand needs. When needed, fertilizer will be added to irrigation water to stimulate and support adequate vegetative growth and cover levels needed for dust control. The applied nutrients may include, but are not limited to: nitrogen, phosphorus, and potassium fertilizers, as well as small amounts of micronutrients. Soil and plant tissue will be monitored to determine fertilizer application rates based on plant nutrient needs, and to avoid excess application that might induce off-site migration of applied nutrients.

Where soil or groundwater conditions so dictate, drainage improvements will be made to reduce the influence of saline shallow groundwater on the plant root zone. Drainage improvements may include: augmentation of natural drainage by increasing the size (height and width) of the raised beds; excavation of drainage interceptor canals; and/or installation of a subsurface drainage network to maintain an adequate depth of leached and unsaturated soil for plant rooting. Drains will consist of perforated plastic pipes, installed in covered trenches, placed between four and 10 feet below ground surface. The drains will be enveloped by coarse material (fine gravel or sand), and wrapped in a fabric liner to prevent sediment movement into the perforated pipe, while still allowing for water collection. Final site conditions, design needs, operational inputs, vegetative cover levels, and control efficiency requirements will determine the ultimate mix of infrastructure to achieve dust control.

Tractor and backhoe/excavation (tracked and/or wheeled) equipment will be used during construction and operation of the DCM and irrigation systems, and for planting/maintenance of vegetation. Intermittent tractor and/or backhoe access will be required during the maintenance activities including, but not limited to cultivation and weed control. Intermediate access between periods of maintenance will likely be with personal and small utility four-track vehicles.

#### 1.2.4 PLANT COMMUNITY ENHANCEMENT

As the Sea recedes, plant communities along the shoreline may naturally expand into some areas. This has been observed especially where freshwater inflows create fresher, shallow groundwater and/or leach salts from newly exposed playa and create more favorable growing conditions. These plant communities, whose expansion can be encouraged by land and water management, can achieve densities that provide adequate playa protection and reduce or eliminate the need more intensive DCMs. Figure 3 shows native plant communities along the playa.



**Figure 3.**  
*Existing Playa Vegetation would be Expanded and Enhanced under the Plant Community Enhancement Dust Control Measure.*

This approach may be attractive due to the relatively low level of investment required to achieve some control. It may prove to require more water than other approaches and therefore warrant later replacement, but has great promise for near-term control, and for control along the shoreline strand as the Sea recedes.

#### CONFIGURATION/VEGETATION

The central concept of the vegetation enhancement DCM is enhancement of existing vegetation that can spread onto new playa as the Salton Sea recedes. Configuration of the DCM, selection of vegetative species, and irrigation design will be determined by the existing vegetation and site-specific (landscape position, hydrologic, and salinity) conditions. Species would likely be a mix of sedges, rushes, and similar wetland vegetation located near the wet shoreline; grasses and other herbaceous species near the middle of the landscape; and shrub species in drier areas near and above the historic shoreline. Hydrophytic vegetation would likely line watercourses as they cross the playa. As the Sea continues to recede, it is anticipated that the species mix (with the right management) will migrate down the Playa with the shoreline. Over time, needed vegetation densities may no longer be sustainable in some areas without additional inputs, such as irrigation and/or artificial drainage. At this point, based on monitoring data, sensitive areas would likely be transitioned to another DCM as needed to sustain dust mitigation performance.

#### OPERATION

Any combination of flood, pulse, or drip irrigation may be used to meet plant water demand. When needed, fertilizer will be added to irrigation water to stimulate and support vegetative cover levels needed to meet the dust control efficiency requirements. The applied nutrients may include, but

are not limited to: nitrogen, phosphorus, and potassium fertilizers, as well as small amounts of micronutrients. Soil and plant tissue will be monitored to determine fertilizer application rates based on plant nutrient needs, and to avoid excess application that might induce off-site migration of applied nutrients.

Tractor and tillage (tracked and/or wheeled) equipment may be used during construction and operation of the DCM, and for planting/maintenance of vegetation. Intermittent tractor and/or backhoe access will be required during the maintenance activities including, but not limited to cultivation and weed control. Intermediate access between periods of maintenance will likely be with personal and small utility four-track vehicles.

### **1.2.5 TILLAGE**

This DCM entails roughening the land surface, either with conventional tillage implements or by other means. The means of tillage depends on the target roughness and on soil conditions. To maintain control over time, tillage may need to be repeated periodically as the land surface is smoothed by erosion, sedimentation, and settling. All or part of the land surface may be tilled, depending on the degree of control required and on other factors. The roughened surface is less susceptible to erosion due to the lifting of the boundary layer of moving air further above the land surface, and due to the capture of mobile sand within the eddies created by the roughened surface.

#### **CONFIGURATION**

Where less than 100 percent of the land surface can be tilled to achieve target levels of control, tillage can be done in blocks or strips that facilitate tillage by minimizing turning, and that avoid traffic on untilled areas to the maximum extent practicable. The long axis of tilled blocks should be oriented perpendicular to the principal wind vectors. Long, uninterrupted fetches across untilled areas should be avoided. Tillage configurations are currently being installed and monitored at Owens Lake. Results should serve as a useful guide when designing pilot studies for the Salton Sea.

For heavier (more clayey) soils, relatively deep cuts will require substantial draft power and have a relatively narrow working width (per pass), whether soil is turned with a dozer blade or plow. However, resulting roughness is substantial and should not require as frequent re-tillage as lighter soils.

On lighter (sandier) soils (which are rare on the Playa), tillage may be more superficial and be done with lighter, wider equipment (e.g., a sandfighter). It should therefore proceed more rapidly, but will likely have to be maintained at a more frequent interval.

#### **OPERATION**

Tillage has some significant cost and operational advantages over other dust control approaches. Relative to other control measures, it can be designed and installed at fairly low cost with unspecialized equipment. However, maintenance costs may be significant, depending on the average return time for tillage and the types of implements used. One of the great strengths of tillage, where applicable, is its potential for flexible, rapid, and relatively low-cost deployment.

The main challenges of tillage are the need to adapt the approach to soil conditions and required level of control, and the potentially frequent and maintenance activity. It could also be that, as soils dry on the playa, the effectiveness of tillage may decline, and the cost of adequate control increase. Over time, tillage could also become a significant dust source, both due to the substantial dust emissions during the tillage operation, and if the tilled surfaces are no longer sufficiently moist and stable to provide to confer control. On the other end of the spectrum, when soils are too moist, it is

very difficult to achieve the draft power needed to pull or push equipment, and workability of the soil, functioning of equipment, and resulting tilled surface conditions can all be compromised.

### **1.2.6 DUST CONTROL MEASURE MONITORING**

Monitoring and testing is expected to continue for three to five years after pilot study construction. During this time, DCM performance, impacts, and maintenance requirements will be monitored to determine how full-scale facilities could be efficiently and effectively configured and managed, how dust control is sustained over time, and to better understand other impacts on the environment.

1. Although monitoring will vary according to specific questions about each DCM, the following will generally be assessed:
  - Meteorological and aerometric (i.e., sand motion, dust concentrations in ambient air) measurements will be made to determine the level of achieved dust control.
  - Land surfaces will be observed for evidence of wind erosion to identify dust source areas and erosion intensity within the site footprint.
  - Habitat and species of interest will be monitored. Species' use of and demographic response to DCM design will be assessed.
  - Plant establishment, cover development, water flow, irrigation, erosion and deposition will be monitored to define relationships between water management, cover development, and dust control effectiveness.
2. Monitoring (in addition to above) is anticipated in the habitat swale pilot test:
  - Water, sediments, and biota will be sampled periodically to establish levels of eco-risk associated with irrigation with Sea inflows.

At some point during their operation, the facilities will be integrated into a full-scale dust control facility; transitioned to another, more suitable dust control approach that is not yet known; or developed into other facilities associated with geothermal, agricultural, or Salton Sea restoration land uses.

## **1.3 COORDINATION AND DECISION MAKING**

This AQ Program element addresses communication and coordination with responsible air quality regulatory authorities, including the Imperial County Air Pollution Control District (ICAPCD), the South Coast Air Quality Management District (SCAQMD), the California Air Resources Board (ARB), and the U.S. Environmental Protection Agency (EPA). In the long term, the principal enforcement responsibility lies with the local districts (ICAPCD and SCAQMD) and specific mitigation requirements will in many cases be developed and implemented by and/or with these agencies. IID intends to regularly review and update the AQ Program with the regulatory agencies. This review will ensure that IID's mitigation requirements are satisfied as conditions change and that there is a growing and shared understanding of the playa.

### **1.3.1 PLAYA TRAFFIC MANAGEMENT**

The extensive desert areas around the Salton Sea attract recreationalists and off-road vehicle traffic. Off-road vehicle traffic disturbs the natural stability of crust and soil surfaces. Prevention of crust and soil disturbance is viewed as the most important and cost-effective measure available to avoid emissions. Playa traffic management will include limiting public access, especially off-highway vehicle access, to the extent legally and practicably feasible.

Private landowners and public agencies currently manage traffic by various, uncoordinated means. Practical challenges with policing large areas have encouraged other approaches, such as public outreach and education, posting, fencing, installing gates, and selectively closing or maintaining roads and trails. The focus of playa traffic management will be fostering coordination among various agencies and landowners to efficiently achieve the desired level of protection.

### **1.3.2 CREATE OR PURCHASE OFFSETTING EMISSION REDUCTION CREDITS**

This AQ Program element is deferred until the potential for emissions credit generation and offsets is assessed with air quality regulatory agencies. This requirement will be pursued if determined to be feasible and advantageous during these discussions.

### **1.3.3 LONG TERM IMPLEMENTATION**

*This section will be developed in a subsequent draft.*

## **2 PROCESS FOR EVALUATING POTENTIAL ENVIRONMENTAL IMPACTS**

The section describes the process to evaluate potential environmental impacts associated with implementation of the AQ Program. The environmental approach is to evaluate the AQ Program using the significance criteria used in the Water Transfer EIR/EIS. The purpose is to determine whether there are any new significant impacts or a substantial increase in the severity of a previously identified significant impact; and accordingly, whether additional CEQA documentation is required for the Water Transfer Project. If there are no new significant impacts or a substantial increase in the severity of a previously identified significant impact, then the process will document consistency with the Water Transfer EIR/EIS and demonstrate that no additional CEQA analysis is required. It is understood that the elements of the AQ Program will evolve over time and it is anticipated that environmental review may be needed periodically.

### **2.1 CEQA GUIDELINES**

Section 15162 of the *State CEQA Guidelines* provides that, for a project covered by a certified EIR, no subsequent or supplemental EIR shall be prepared for that project unless one or more of the following conditions occur:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of the previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
  - a. The project will have one or more significant effects not discussed in the previous EIR.
  - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR.

- c. Mitigation measures or alternatives previously found not to be feasible would in the project, but the project proponents decline to adopt the mitigation measures or alternatives.
- d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measures or alternatives.

## 2.2 EVALUATION FOR KNOWN AIR QUALITY PROGRAM ELEMENTS

As described in Section 1, the AQ Program includes three main elements: mapping and monitoring, pilot projects, and coordination and decision-making. When the project descriptions are developed, each component will be evaluated with an Initial Study checklist. If an Initial Study reveals that none of the conditions in Section 15162 are met; then the Initial Study would be filed in the administrative record as documentation of the evaluation. If an Initial Study reveals that one or more of the conditions in Section 15162 are met; then a subsequent or supplemental EIR (or other appropriate CEQA document) would be prepared.

Two elements of the AQ Program have project descriptions: mapping and monitoring and pilot projects. The CEQA compliance for mapping and monitoring and the Initial Study checklist for the pilot projects are included in Attachments 2 and 3, respectively. The Initial Study considers the potential effects within a closely defined geographical area, specifically the playa between the water's edge and the existing vegetation. The rationale for this boundary is that: 1) the Salton Sea has been ruled to be a water of the United States and U.S. Army Corps of Engineers permits would likely be required for work below the ordinary high water mark; 2) similarly, certain habitat may meet Corps' criteria as wetlands and also require permitting, and; 3) the playa between the shore and vegetation is remarkably monotypic and potential impacts are generally similar, if not identical, regardless of location. The Initial Study for the pilot projects concludes that none of the conditions in Section 15162 have been met at this time.

Coordination and Decision Making is not typically considered a "project" because it does not have physical effects on the environment. However, *implementation* of the decisions may be considered a "project" and could have physical effects on the environment. The process for determining future environmental review is described in the following section.

## 2.3 EVALUATION FOR FUTURE AIR QUALITY PROGRAM ELEMENTS

This section describes the process by which a new component or project of the AQ Program will be evaluated for potential environmental effects. Future projects may include additional monitoring stations, additional or new pilot projects, or full-scale implementation of dust control measures. This process allows for an explicit screening of future projects to determine the appropriate level of CEQA documentation (i.e., memorandum to file documenting consistency with the Water Transfer EIR/EIS, or a subsequent or supplemental EIR or other appropriate CEQA document). The intent of the future-project process is to enhance process efficiency. The benefits of this approach are that it contributes to consistent application of CEQA, streamlined CEQA compliance, and increased planning certainty.

The process for determining the level of documentation for CEQA compliance on future AQ Program projects is as follows (*note: the maps discussed below will be developed in a subsequent draft*):

1. **Prepare project description and location map**

Prepare detailed project descriptions including a brief statement of project need and objectives and the basic technical and environmental characteristics. Prepare a detailed location map showing the precise location and boundaries of the proposed project.

2. **Determine whether the project is located entirely on the playa**

Compare the proposed project location with the boundary maps included in the AQ Program Initial Study for that element. For example, the Initial Study for the Pilot Projects will include a map of all potential pilot project locations. If the project is located entirely within the boundaries already evaluated, then proceed with the next step in the process. If the project is not located within the boundaries, then relocate the project or initiate a new Initial Study checklist to determine if any of the requirements of Section 15162 are met.

3. **Determine whether the project is located entirely on IID-owned lands**

Compare the proposed project location with the boundary maps included in the AQ Program Initial Study for that element. If the project is located entirely within IID boundaries, then proceed with the next step in the process. If the project is not located within the boundaries, then relocate the project or initiate a new Initial Study to determine if any of the requirements of Section 15162 are met.

4. **Determine whether the project affects drainages with known sensitive aquatic species**

Compare the proposed project location with the sensitive drainages map in the AQ Program Initial Study for that element. If the project avoids these mapped drainages, then proceed with the next step in the process. If the project may affect one or more drainages with sensitive aquatic species, then relocate the project, review the HCP for consistency with take provisions, and/or initiate a new Initial Study to determine if any of the requirements of Section 15162 are met.

5. **Determine whether any discretionary permits are required**

Evaluate the project description to determine whether it would require any new discretionary approval for an action not covered in the AQ Program Initial Study for that element or the Water Transfer EIR/EIS. If a discretionary permit is required for an action not covered in the Water Transfer EIR/EIS, then relocate the project or initiate a new Initial Study to determine if any of the requirements of Section 15162 are met.

If a future-project meets all of these criteria (i.e., its located entirely on the playa, its located entirely on IID-owned land, it does not affect sensitive drainages, and no discretionary permits are required), then a memorandum would be filed in the administrative record as documentation of the evaluation.

If any of the criteria are not met, then a new Initial Study checklist would be completed to determine if any of the conditions of Section 15162 are met. If an Initial Study reveals that none of the conditions in Section 15162 are met; then the Initial Study would be filed in the administrative record as documentation of the evaluation. If an Initial Study reveals that one or more of the conditions in Section 15162 are met; then a subsequent or supplemental EIR or other appropriate CEQA document would be prepared. The following flow chart depicts the process for evaluating future AQ Program projects (*note: flow chart to be developed in subsequent draft*).

## **2.4 CUMULATIVE EFFECTS**

*This discussion would demonstrate consistency with the cumulative analysis in the Water Transfer EIR/EIS and underscore the overall beneficial effect of the AQ Program on dust emissions at the Salton Sea. The cumulative effect analysis will be developed in a subsequent draft.*

DRAFT

**ATTACHMENT 1**  
**POTENTIAL ENVIRONMENTAL PERMITS**

DRAFT

**Attachment 1**

**Anticipated Permits/Approvals for the Air Quality Program**

Agency and Permit/Approval	Applicability
<b>Federal</b>	
U.S. Army Corps of Engineers (Corps), Clean Water Act (CWA) Section 404	Section 404 of the CWA regulates the placement of dredged or fill material into all waters of the U.S. and adjacent wetlands. The project may require a nationwide permit for fill activities associated with construction of intake structures to support irrigation of pilot projects. If it is determined that an individual permit would be required, then the timeframe to obtain the permit would increase and NEPA compliance would be required.  Timeline: Nationwide: 30 to 60 days / Individual: 6 to 12 months
US Fish & Wildlife Service (USFWS), Endangered Species Act (ESA) Consultation	Intake facilities may be constructed on the New or Alamo Rivers. Federally listed species (i.e., desert pupfish and razorback suckers) are typically not present in the New or Alamo River due to poor water quality, high sediment loads, excessive velocities, and predators. Furthermore, implementation of pilot projects would be consistent with IID's HCP, therefore separate ESA consultation is not anticipated.
<b>State</b>	
State Historic Preservation Officer (SHPO), Section 106 Consultation	Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to consider the effects of their actions on properties that are listed in or eligible for listing in the National Register of Historic Places (NRHP). As a part of the IID Water Conservation and Transfer Project EIR/EIS, cultural resources information was obtained for the IID water service area from the California Historical Resources Information System (CHRIS) and Indian tribes with traditional and historic ties to the Salton Sea, the IID water service area, and the LCR geographic subregion. No historic resources were identified on the playa. Section 106 compliance would likely not be required; however, if a Corps permit is required, then consultation would be necessary.  Timeline: 60 to 90 days
Regional Water Quality Control Board (RWQCB), CWA Section 401 Water Quality Certification	Section 401 requires states to certify that any activity that potentially discharges into navigable waters meets state water quality standards. This gives states the authority to deny or impose conditions on any activity that would adversely impact water quality. Section 401 compliance may be required for fill activities associated with construction of an intake structure.  Timeline: 90 days
California Department of Fish & Game (CDFG), Lake or Streambed Alteration Agreement	Section 1600 of the Fish and Game Code regulates alteration (i.e., diversion, obstruction, or change) to the bed, bank, or channel of streams, rivers, or lakes, including dry washes. The proposed project may require a Streambed Alteration Agreement for construction of the intake structure on the New or Alamo River.  Timeline: 90 days
CDFG, California Endangered Species Act Consultation (CESA 2081)	Intake facilities may be constructed on the New or Alamo Rivers. State listed species (i.e., desert pupfish and razorback suckers) are typically not present in the New or Alamo River due to poor water quality, high sediment loads, excessive velocities, and predators. Furthermore, implementation of pilot projects would be consistent with IID's HCP, therefore separate ESA consultation is not anticipated.

Colorado River Basin Regional Water Quality Control Board, NPDES Permit	As currently envisioned, water used for irrigation of pilot projects would be “pulsed” through test areas to achieve vegetative and soil-stabilization objectives. It is estimated that 80-90 percent of pulse flows would reach the Salton Sea. Water, sediments, and biota will be sampled periodically to establish levels of eco-risk associated with irrigation with Sea inflows. A discharge permit may be required from the RWQCB.  Timeline: 180 days
Central Valley Flood Protection Board (formerly State Reclamation Board), Encroachment Permit	An Encroachment Permit may required for construction of an intake structure if it is determined that the berms of the New or Alamo River are under the jurisdiction of the Reclamation Board.  Timeline: 60 days
State Lands Commission, Land Lease	A Land Lease is required before construction in the bed of a “Navigable River” under SLC jurisdiction. A Land Lease may be required for construction of an intake structure if it is determined that the New or Alamo River is under the jurisdiction of the State Lands Commission.  Timeline: 90 to 120 days
<b>Local</b>	
Imperial County Grading Ordinance, Earthmoving and Grading	The proposed project will include earthmoving and grading activities. A grading permit would likely be required for these activities, in accordance with the requirements outlined in the ordinance.
Imperial County Air Pollution Control District, Fugitive Dust Rule.	The proposed project will include earthmoving and grading activities. The appropriate control measures (e.g., watering unpaved roads or covering piles) would be outlined in a dust control plan to reduce fugitive dust emissions, as required by Rules 800 through 806.

**ATTACHMENT 2**  
**CEQA COMPLIANCE FOR MAPPING AND MONITORING**

DRAFT

### **CEQA Compliance - Mapping and Monitoring Associated with Air Quality Program**

The CEQA Guidelines (PRC Section 21065 and CEQA Guidelines Section 15378) define a "project" as the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is ...an activity directly undertaken by any public agency including ... public works construction and related activities. Thus, under CEQA, "projects" must be discretionary, public agency actions which have the potential of affecting the environment.

Monitoring of the Air Quality Pilot Project will involve periodic trips to the monitoring sites, placement of small-scale, low-profile monitoring equipment, and collection of data from the monitoring equipment. Implementation of the Monitoring Program would be consistent with existing agricultural activities, would not affect the visual character of the project area, and would not affect roadway levels of service. Therefore, this endeavor is not considered a CEQA activity and as such does not require analysis of impacts or the CEQA checklist found in other sections of this document.

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**ATTACHMENT 3**  
**INITIAL STUDY FOR PILOT PROJECTS**

DRAFT

Note: This checklist will be updated in a subsequent draft to include maps of pilot project locations, property ownership, and sensitive drainages.

## I. AESTHETICS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Environmental Setting

All of the pilot projects would be located on the playa. The playa is the exposed, dry bed of the Salton Sea. It is characterized by substantial barren shoreline where few to no plants or animals currently exist. The main visual resource in the area is the Salton Sea. Surrounding mountains provide a backdrop.

### Discussion

Would the project:

**a) *Have a substantial adverse effect on a scenic vista?***

Scenic vistas consist of Salton Sea views seen from Highways 86 and 111. Visual character of pilot projects would not be different in kind from "drain habitat," so the existing character of the region surrounding the Salton Sea would not be changed. A less than significant impact would occur.

**b) *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?***

No scenic resources or scenic highways are located at or near proposed project sites. Therefore, no impact would occur.

**c) *Substantially degrade the existing visual character or quality of the site and its surroundings?***

The projects would not change the existing visual character of proposed sites or their surroundings. Implementation of the proposed pilot projects will add variability to the landscape, generally consistent with existing drain habitat.

**d) *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?***

Pilot projects do not include lighting features; therefore, no impact would occur.

## Mitigation Measures

No significant impacts have been identified; no mitigation is required.

## II. AGRICULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping & Monitoring Program of the California Resources Agency, to non-agricultural uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Setting

The project site is not located within an area currently designated as Prime Farmland and Farmland of Statewide Importance by the Department of Conservation's Farmland Mapping and Monitoring Program. It is adjacent to the shoreline of the Salton Sea on mud flats and adjacent barren land.

## Impacts

Would the project:

- a) *Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*  
The pilot projects would be located on the Salton Sea playa. No impacts to agricultural lands would occur.
- b) *Conflict with existing zoning for agricultural use, or a Williamson Act contract?*  
Proposed project areas are not within agricultural lands; therefore, no impacts to such lands would occur.
- 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?*  
Proposed project areas would not involve other changes to the environment that could result in the conversion of additional farmland to non-agricultural uses; therefore, no impact would occur.

## Mitigation Measures

No mitigation measures are necessary because no agricultural lands would be affected.

### III. AIR QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### Environmental Setting

The U.S Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have designated each county within California as either attainment or non-attainment for the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS). Pursuant to the federal Clean Air Act, EPA has designated Imperial County as a federal transitional nonattainment area for ozone, and the IID water service area portion of the county is designated as a federal moderate nonattainment area for PM<sub>10</sub>. All areas of the County are designated as attainment for NAAQS for CO, NO<sub>2</sub>, and SO<sub>2</sub>. The proposed pilot projects are intended to provide data that will lead to improvements in air quality in the region.

#### Impacts

Would the project:

**a) *Conflict with or obstruct implementation of the applicable air quality plan?***

The proposed project is designed to reduce PM<sub>10</sub> (dust). There would be a beneficial impact if the proposed project was constructed.

**b) *Violate any air quality standard or contribute substantially to an existing or projected air quality violation?***

**Construction Impacts.** Construction would result in a temporary increase in PM<sub>10</sub> (dust) emissions, soil erosion potential, and traffic and transportation impacts. These impacts would be temporary and could be reduced substantially with implementation of BMPs during construction. Further, these impacts would be offset by the long-term benefit to air quality by implementing dust control measures on the playa. Therefore, short-term, less than significant impacts would be offset with mitigation and long-term beneficial impacts would occur.

**Operational Impacts.** Operation of the dust control features will not result in emissions. Periodic monitoring would occur, which would require regular vehicle trips to the

project site. Emissions from these vehicles would be minimal. Therefore, no impact would occur.

**c) *Expose sensitive receptors to substantial pollutant concentrations?***

Locations where the very young, elderly, and those suffering from certain illnesses or disabilities reside are considered “sensitive receptors” to air quality impacts. Sensitive receptors are schools, day care centers, parks, recreational areas, medical facilities, rest homes, convalescent care facilities, and residences. Proposed projects would not be located near sensitive receptors; therefore, no impacts would occur.

**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 which exceed quantitative thresholds for ozone precursors)?***

Air emissions during construction will be less than significant with mitigation incorporated. During operation, there would be a beneficial impact to air quality; therefore, there would be no net increase of any criteria pollutant during construction or operation; no impacts would occur.

**e) *Create objectionable odors affecting a substantial number of people?***

The proposed project is not anticipated to generate any objectionable odors, so it would not affect a substantial number of people. Therefore, no impact would occur.

### **Mitigation Measures**

Although impacts are less than significant, implementation of BMPs during construction and operation would help to minimize PM<sub>10</sub> emissions. BMPs could include, but are not limited to, the following:

- Equip diesel powered construction equipment with particulate matter emission control systems, where feasible.
- Use paved roads to access the construction sites when possible.
- Limit vehicular access to disturbed areas, and minimize vehicle speeds.
- Reduce ground disturbing activities as wind speeds increase. Suspend grading and excavation activities during windy periods (i.e., surface winds in excess of 20 miles per hour).
- Limit vehicle speeds to 10 mph on unpaved roads.
- Cover trucks that haul soils or fine aggregate materials.
- Enclose, cover, or water excavated soil twice daily.
- Cover stockpiles of excavated soil at all times when the stockpile is not in use. Secure the covers.
- Designate personnel to monitor dust control measures to ensure effectiveness in minimizing fugitive dust emissions.

## IV. BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Environmental Setting

Areas surrounding the Salton Sea are mainly agricultural fields used by many bird species. Birds subsisting primarily on fish are also attracted to the Salton Sea. These habitats attract and support wildlife that historically would have been absent or present in low numbers in the native desert habitat. Today, small areas of native desert habitat persist in the area, but the area mainly supports habitats created and maintained by water imported to Imperial Valley for agricultural production. The barren mud flats and shoreline proposed for the air quality mitigation project are not prime habitat for either nesting or feeding waterfowl.

### Impacts

Would the project:

- a) *Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

Proposed project sites would be located in currently barren mud flats and shoreline of the Salton Sea. Currently these areas are low-value habitat. Where pilot projects include vegetation or more complex habitat, benefits to biological resources may occur. Selection of proposed project locations would be coordinated with the ongoing efforts of the IID's

HCP/NCCP and would therefore be consistent with ongoing conservation of special status species and state and federal protection of special status species.

- 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 California Department of Fish and Game or U.S. Fish and Wildlife Service?*

Project locations would be selected to be consistent with IID's HCP/NCCP; therefore, no impact would occur.

- c) *Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

Pilot projects would be constructed on open playa, where no open waters, wetlands, marsh, or vernal pools currently exist; therefore, no impact would occur.

- d) *Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

Project disturbance areas would not impede the use of native wildlife nursery sites. In some cases, construction of pilot projects would provide additional habitat for nesting wildlife; therefore, no impact would occur.

- e) *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

Proposed project sites are currently in barren mud flats and shoreline. The project would not conflict with any local policies or ordinances protecting biological resources. Therefore, no impact would occur.

- 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?*

Project proponents are currently finalizing the HCP/NCCP which will establish comprehensive methods for protecting sensitive species in the region. Proposed projects will be consistent with the HCP/NCCP.

### Mitigation Measures

No significant impacts have been identified, so no mitigation is required.

## V. CULTURAL RESOURCES

Would the project:	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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Environmental Setting

As a part of the IID Water Conservation and Transfer Project EIR/EIS cultural resources information was obtained for the IID water service area from the California Historical Resources Information System (CHRIS). Reclamation and others have also contacted Indian tribes with traditional and historic ties to the Salton Sea, the IID water service area, and the LCR geographic subregion to solicit information about cultural resources of concern to those tribes. Known/recorded archaeological resources within the IID water service area include 979 prehistoric sites, 111 historic sites, and several other elements of the historic built environment.

## Impacts

Would the project:

a) *Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?*

No historic resources were identified in the project vicinity. Therefore, no impact would occur. However, there is the potential for construction activities to encounter buried historical resources. If currently unknown historic resources are disturbed during construction, the impact could be significant. The impact could be reduced to a less-than-significant level with mitigation.

b) *Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

No archaeological resources were identified in the project vicinity. Therefore, no impact would occur. However, there is the potential for construction activities to encounter buried archaeological resources. If currently unknown archaeological resources are disturbed during construction, the impact could be significant. The impact could be reduced to a less-than-significant level with mitigation.

c) *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

No paleontologic resources were identified in the project vicinity. Therefore, no impact would occur. However, there is the potential for construction activities to encounter unknown paleontologic resources. If unknown paleontologic resources are disturbed during construction, the impact could be significant. The impact would be reduced to a less-than-significant level with mitigation.

d) *Disturb any human remains, including those interred outside of formal cemeteries?*

No human remains are known to be present in the project vicinity. Therefore, no impact would occur. However, there is the potential for construction activities to encounter buried human remains. If currently unknown human remains are disturbed during construction, the impact could be significant. The impact could be reduced to a less-

than-significant level with mitigation.

### Mitigation Measures

The following mitigation measures have been designed to provide assurances in the event that if cultural resources are encountered during project construction or operation, they will be handled appropriately.

### Archaeological Resources

- In the event of an unanticipated cultural resource discovery during construction, all ground disturbances within 200 feet of the discovery will be halted or re-directed to other areas until the discovery has been documented by a qualified archaeologist and its potential significance evaluated in terms of applicable criteria. Resources considered significant will be avoided or subject to a data recovery program as described above.
- Coordinate with SHPO and local Native American groups, if required, in compliance with applicable state laws.

### Paleontologic Resources

- 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 paleontologic resources recovered will be appropriately described, processed, and curated in a scientific institution such as a museum or university.

## V. GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Rupture of a known earthquake fault, as delineated in the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines & Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Geological Setting

The Salton Trough is a broad, flat alleviated valley with an area of about 6,000 square miles. The entire valley lies below 500 feet above sea level, and more than 3,000 of its 6,000 square miles are below sea level. The Salton Trough is filled with approximately 2,000 feet of Cenozoic sediments derived predominantly from the Colorado River, which emptied into the Gulf of California during the Cenozoic period. The sediments formed a delta that spread and eventually separated the Salton basin from the Gulf of California. Wind blown sand deposits form a 40-mile long by 5-mile wide belt of sand dunes extending along the east side of the Coachella Canal from the International Boundary. Within Coachella and Imperial Valleys lacustrine deposits document old lake shorelines. During the Pleistocene, Lake Coachella covered an area approximately 117 miles long and 30 miles wide. These lake deposits comprise the Imperial Formation, which underlies sedimentary layers of the Salton Basin.

The lacustrine basin soils left behind by Pleistocene Lake Coachella and Lake Cahuila consist of silty clays, silty clay loams and clay loams. These soils are deep and highly calcareous, usually containing gypsum and soluble salts. Much of the Salton Trough drains poorly resulting in a build up of salts in the soil (see Table V-1).

TABLE V-1  
Permeability of Soils Mapped by NRCS (2004) at the EHP1 Site

Soil Series	Permeability Rating	Acres (% parcel total)
Imperial	Very slow	455 (33%)
Meloland	Slow	539 (39%)
Vint	Moderately rapid	58 (4%)
Niland/Rositas	Rapid	329 (24%)
	<b>Total</b>	<b>1,382 (100%)</b>

The Salton Trough is one of the most tectonically active regions in the United States. The San Jacinto-Coyote Creek and Elsinore-Laguna Salada fault zones form the western boundary of the Salton Trough. Branches of the San Andreas fault zone form the eastern boundary. The Salton Trough is characterized by northwest-southeast trending transform fault zones with several crustal rift areas between them. The Salton Trough is the northern

extension of the Gulf of California rift zone. Consequently, the project area is subject to potentially destructive earthquakes.

## Discussion

Would the project:

a) *Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:*

i) *Rupture of a known earthquake fault, as delineated in the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines & Geology Special Publication 42.*

ii) *Strong seismic ground shaking?*

iii) *Seismic-related ground failure, including liquefaction?*

iv) *Landslides?*

Pilot projects would not include construction of structures that would expose people or structures to earthquakes, ground shaking, ground failure or landslides.

b) *Result in substantial soil erosion or the loss of topsoil?*

The primary purpose of pilot projects would be to accumulate soil and control emissive conditions.

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?*

Pilot projects may be located on unstable soil; however, the purpose of pilot projects would be to increase stability of soils to avoid emissive conditions.

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?*

Pilot projects do not include structures or buildings that would result in risks to life or property.

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?*

Wastewater disposal systems are not included as part of the pilot projects.

## Mitigation Measures

Construction of pilot projects are intended to improve the air quality in the Salton Sea region and help to stabilize windblown soils and control erosion along the shores of the Salton Sea. Pilot projects will not result in negative effects to soils or geology nor will they expose people or property to increased risks associated with geologic events; therefore, no mitigation is necessary.

## V. HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

Operation of pilot projects would not include use of hazardous materials; however, construction of pilot projects could involve use of equipment that uses standard construction materials such as diesel fuel and oils that can be considered hazardous.

### Would the project:

- a) *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Pilot projects would not include operations that transport, use, or dispose of hazardous materials. Construction of pilot projects would include use of standard construction equipment such as backhoes and scrapers. Use of common construction equipment would be subject to standard practices that would reduce or eliminate the potential for significant impacts.

- 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?*

Pilot projects would not create hazardous conditions to the public through any foreseeable accident conditions. Construction of pilot projects would include use of standard construction equipment such as backhoes and scrapers. Use of common construction equipment would be subject to standard practices that would reduce or eliminate the potential for significant impacts.

- c) *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?*

Pilot projects would not create hazardous emissions or handle hazardous materials near schools.

- 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?*

Pilot projects would not be located on hazardous sites.

- 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?*

Pilot projects would not be located near airports.

- 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?*

Pilot projects would not be located near private airstrips.

- g) *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Pilot projects would not impair or interfere with emergency response or evacuation plans.

- 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?*

Pilot projects would not expose people or structures to wildland fires.

### **Mitigation Measures**

No impacts have been identified; therefore no mitigation is required.

## VI. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) 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 result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional source of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impeded or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding including flooding as a result of failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Result in inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

The Salton Sea reached its present form in 1905 when Colorado River floodwaters breached a temporary diversion that had been designed to bypass a silted-up section of the Imperial Canal. When the dike failed, nearly the entire flow of the Colorado River ran uncontrolled into the Salton Sea Basin for the next 18 months. The Sea has existed continuously from the 1905 event to the present.

Essentially all flow into the Salton Sea is a result of irrigation runoff. Approximately ten percent of the total discharge is from drains that flow directly into the Sea, while fifty-eight percent of the water drains from the Alamo River, and the remainder from the New River. The New River enters the project area from Mexico and serves as an open conduit for

untreated municipal sewage, heavy metals, and agricultural drainage waters high in pesticide residues. A small percentage of Salton Sea water derives from precipitation and groundwater.

In some cases, pilot projects would divert flows from the New River, Alamo River, and irrigation drainages before they flow into the Salton Sea. The intent of these periodic diversions would be to establish vegetative and soil characteristics that impair emissive properties of exposed playa that would occur without such diversions. Diversions would be designed to be consistent with applicable federal and state law, including the Clean Water Act and the California Water Code.

Would the project:

**a) *Violate any water quality standards or waste discharge requirements?***

Pilot projects would be designed to be consistent with IID water rights and comply with applicable basin standards. As currently envisioned, water used for irrigation of pilot projects would be “pulsed” through test areas to achieve vegetative and soil-stabilization objectives. It is estimated that 80-90 percent of pulse flows would reach the Salton Sea. The changes to flow timing and amounts is considered less-than-significant.

**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)?***

Pilot projects would not use ground water or interfere with ground water recharge.

**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 result in substantial erosion or siltation on- or off-site?***

Pilot projects would not substantially alter drainage patterns in the playa.

**d) *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 result in flooding on- or off-site?***

Pilot projects would not substantially alter drainage patterns in the playa.

**e) *Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional source of polluted runoff?***

Pilot projects would not alter stormwater systems or produce polluted runoff.

**f) *Otherwise substantially degrade water quality?***

Pilot projects would not substantially degrade water quality.

**g) *Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?***

Pilot projects do not include housing.

**h) *Place within a 100-year flood hazard area structures which would impeded or redirect flood flows?***

Pilot projects do not include structures.

i) **Expose people or structures to a significant risk of loss, injury or death involving flooding including flooding as a result of failure of a levee or dam?**

Pilot projects would not subject people or structures to flooding.

j) **Result in inundation by seiche, tsunami, or mudflow?**

Pilot projects would not be located in areas known to be subjected to seiche, tsunami, or mudflow.

### Mitigation Measures

Construction of pilot projects along the barren shoreline of the Salton Sea would have no effect on drainage patterns and would not degrade water quality; therefore, no mitigation measures are necessary.

## IX. LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

Federal, state, and local land use plans are in place to define land use goals for public, state, county and private lands. Most of the southern shore of the Salton Sea is zoned "Open Space/Preservation (S-1)." According to Imperial County's Title 9 Land Use Ordinance (County of Imperial 1998), "the purpose of the S-1 Zone is to designate areas that recognize the unique Open Space and Recreational character of Imperial County, including the deserts, mountain, and water front areas. Primarily, the S-1 Zone is characterized by low-intensity human utilization and small-scale recreation related uses." Construction of pilot projects is not in conflict with such uses.

Would the project:

a) **Physically divide an established community?**

Pilot projects would not be located in locations that include housing.

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?**

Pilot projects are compatible with the current designation of open space.

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

Pilot projects would be designed to be consistent with IID’s HCP and NCCP.

**Mitigation Measures**

Construction and operation of pilot projects along the open space playa of the Salton Sea would have no effect on housing and would be consistent with land use designations and ongoing HCP and NCCP efforts; therefore, no mitigation measures are necessary.

**X. MINERAL RESOURCES**

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion**

Mineral resources in the project area include: mineral resources such as rock and stone, sand, gravel, clay, and gypsum, metals such as gold, silver, nickel, and lead, radioactive elements, and geothermal areas. Geothermal resource areas and sources of sand and gravel are concentrated along the southern border of the Salton Sea.

**Would the project:**

**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?**

Pilot projects would not affect known mineral resources.

**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?**

Pilot projects would not affect locally-important mineral resource recovery sites.

**Mitigation Measures**

The proposed pilot projects would have no effect on mineral or geothermal resources. Therefore, no mitigation measures are necessary.

**XI. NOISE**

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

The primary documents establishing noise standards in Imperial County are the Imperial County General Plan Noise Element and the Imperial County Noise Abatement and Control Ordinance. The General Plan limits sound levels from construction activities during specific hours of the day and night through a set of construction noise standards (Table XI-1).

Duration Of Construction	Noise Source	Sound Level (Db L <sub>eq</sub> ) <sup>1</sup>	Period Of Averaging (Hours)	Restricted Hours Of Operation
Short-term (days or weeks)	Single piece of construction equipment	75	8	7 am to 7 pm Monday-Friday 9 am to 5 pm Saturday No commercial construction is permitted on Sunday and holidays.
Short-term (days or weeks)	Combination of pieces of construction equipment	75	8	7 am to 7 pm Monday-Friday 9 am to 5 pm Saturday No commercial construction is permitted on Sunday and holidays.
Extended-term <sup>2</sup>	Single piece of construction equipment	75	1	7 am to 7 pm Monday-Friday 9 am to 5 pm Saturday No commercial construction is permitted on Sunday and holidays
Extended-term <sup>2</sup>	Combination of pieces of construction equipment	75	1	7 am to 7 pm Monday-Friday 9 am to 5 pm Saturday No commercial construction operation is permitted on Sundays and holidays.

<sup>1</sup> As measured at the nearest sensitive receptor.

<sup>2</sup> The standards assume a construction period, relative to an individual sensitive receptor, of days or weeks. The standard can

be made more restrictive in cases of extended-length construction times.

$L_{EQ}$  = unit for measuring environmental sounds; dB = decibel

Temporary and short-term impacts during construction are anticipated to occur, including impacts from vehicles and equipment required to construct and monitor the proposed facilities. As long as the requirements described in the General Plan are followed, impacts would be less than significant. Operation of pilot projects would not generate appreciable increases in noise.

**Would the project:**

**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?***

Construction of pilot projects would be conducted in compliance with local noise ordinances as described in Table XI-1.

**b) *Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?***

Construction of the pilot projects would use standard construction equipment typical to small-scale grading and agricultural projects in the region, which are not known to generate excessive groundborne vibration or noise. Operation of the pilot projects would not generate excessive vibration or noise.

**c) *A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?***

Operation of the pilot projects would not result in a substantial increase in ambient noise levels.

**d) *A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?***

Operation of the pilot projects would not result in a substantial temporary or periodic increase in ambient noise levels. Construction of the pilot projects would increase noise levels, however, these increases would be within typical limits prescribed by the county, and are not considered substantial.

**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?***

Pilot projects would not be located within two miles of public airports or public-use airports.

**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?***

Pilot projects would not be located within two miles of private airstrips.

### **Mitigation Measures**

The proposed pilot projects would have a less-than-significant impact on noise in the region. The primary area of concern would be during construction, which would be conducted in accordance with county noise ordinances; therefore, no mitigation measures are necessary. Pilot projects would not generate any appreciable noise during operations.

## XII. POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

Imperial County's three largest population centers are Ell Centro, Calexico, and Brawley. Most of the county's inhabitants live in unincorporated areas. The primary employment sectors are services, agriculture, and government. The proposed air quality mitigation features would have no effect on housing, and would not displace individuals from existing habitations.

### Would the project:

- 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)?*  
Pilot projects would not affect population growth because they would be located on playa not slated for housing.
- b) *Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?*  
Pilot projects would not affect housing because they do not include housing elements.
- c) *Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?*  
Pilot projects would not displace people because they would be located on playa not slated for housing.

### Mitigation Measures

Pilot projects would not affect housing or population; therefore, no mitigation is required.

## XIII. PUBLIC SERVICES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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:				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

Public services and utilities are provided and maintained by various public and private agencies and districts. The Imperial County Fire Department and Office of Emergency Services provide fire protection in unincorporated areas of Imperial County, whereas IID, a community-owned utility, provides electric power and water.

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:

**a) Fire Protection?**

Pilot projects would not affect fire protection resources in the Imperial Valley because they are neither located near such resources, nor would they include structures requiring fire protection.

**b) Police Protection?**

Pilot projects would not affect police protection resources in the Imperial Valley because they are neither located near such resources, nor would they include structures or elements requiring police protection.

**c) Schools?**

Pilot projects would not affect schools in the Imperial Valley because they are neither located near schools, nor would they require school resources.

**d) Parks?**

Pilot projects would not affect parks in the Imperial Valley because operation of plot projects would not preclude use of nearby parks, nor would they negatively affect use of parks.

**e) Other public facilities?**

Pilot projects would not affect other public facilities in the Imperial Valley.

### Mitigation Measures

Public services would not be affected by construction of the proposed pilot projects; therefore, no mitigation measures are necessary.

## XIV. RECREATION

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

Public recreational opportunities in the Salton Sea region include a state recreation area focused on water-based activities, and wildlife refuges where wildlife observation and photography are popular. Private recreational opportunities include rental housing and duck preserves for hunting. Fluctuating water levels have caused the closure and/or decline of many private resorts and restaurants. Swimming and water skiing were once popular activities on the Sea, but declining water quality has resulted in a shift to activities such as sport fishing and boating. As additional playa has been exposed, some areas have experienced increases on ATV traffic, which has increased emissive properties of the exposed playa.

Pilot projects would be designed to reduce windblown dust particles. Improved air quality would have a beneficial affect on recreational use of the Salton Sea.

#### Would the project:

- 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?***  
Pilot projects would not increase the use of existing parks or other recreational facilities.
- b) ***Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?***  
The pilot projects do not include recreational facilities.

### Mitigation Measures

Pilot projects would not affect recreational resources in the region; therefore no mitigation is required.

## XV. TRANSPORTATION/TRAFFIC

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate parking capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Exceed, either individually or cumulatively, a level-of-service standard established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with adopted policies supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

State highways 86 and 111 are the main routes used to access the Salton Sea. They parallel the east (Highway 111) and west (Highway 86) sides of the Salton Sea and continue north and south to intersect Interstate Highways. These routes travel through mainly rural areas and include a mix of passenger vehicles, recreational vehicles, and slow-moving farm equipment.

#### 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)?**

Pilot projects would not substantially increase traffic.

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

Pilot projects would not affect traffic features in the region, not do they represent incompatible uses.

**c) Result in inadequate emergency access?**

Pilot projects would not affect emergency access.

**d) Result in inadequate parking capacity?**

Pilot projects would not affect parking capacity in the region.

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

Pilot projects would not measurably affect level-of-service established by the traffic management agencies.

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

Pilot projects would not conflict with adopted policies addressing methods of transportation.

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?*

Pilot projects would not affect air traffic patterns.

### Mitigation Measures

The proposed pilot projects would not impact transportation; therefore no mitigation is necessary.

## XVI. UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient Permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

Public utilities, including electric power, sewage treatment and potable water, are supplied by various public and private agencies and districts. Most power in the Imperial Valley is generated by hydroelectric facilities at dams along the Colorado River. Each of the cities and

unincorporated communities has its own facilities for treating and distributing water. In towns and unincorporated communities sewage treatment services are in place. In rural areas, residences are served by septic tanks and leach line systems. Water is provided to nine cities and nearly 500,000 acres of agricultural land by the IID.

Some pilot projects would require small amounts of irrigation water, especially during initial stages; however, the majority of the water used on the pilot projects (80 to 90 percent) would continue to reach the sea. Additionally, the amount of water use by these projects would be very low and represent only a very small proportion of the water running off irrigated fields into the Salton Sea, and would serve to offset continuing reductions in flows to the Salton Sea.

**Would the project:**

**a) *Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?***

Pilot projects would not contribute to wastewater treatment.

**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?***

Pilot projects would not require wastewater treatment.

**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?***

Pilot projects would not require or result in construction of storm water drainage facilities.

**d) *Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?***

Pilot project water supplies would be derived from existing entitlement.

**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?***

Pilot projects would not require waste water treatment; therefore no determination is necessary.

**f) *Be served by a landfill with sufficient Permitted capacity to accommodate the project's solid waste disposal needs?***

Pilot projects would not require landfill service.

**g) *Comply with federal, state, and local statutes and regulations related to solid waste?***

Pilot projects would not require solid waste service.

### **Mitigation Measures**

The proposed pilot projects would not impact transportation; therefore no mitigation is necessary.

**XVII. MANDATORY FINDINGS OF SIGNIFICANCE.**

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion**

The proposed pilot projects would have less than significant impacts upon the environment of the Salton Sea. They are, in fact designed to improve the quality of the environment. They would have no impact on plants or wildlife because they would be constructed in barren shoreline environments. They would likely provide additional habitat for animals that does not currently exist along the shore of the Salton Sea. Also, there would be no cumulative impacts because these measures, along with others being developed by farmers and the IID, would result in an overall beneficial affect upon several resources that comprise the environment.

**Would the project:**

- 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?*  
Pilot projects are intended to increase the quality of the environment by improving air quality, and – in some instances – through the development of habitat.
- b) *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)*  
Pilot projects are intended to provide the basis for larger-scale implementation of air quality projects that improve the environment. These effects are considered beneficial.
- c) *Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?*

Pilot projects are intended to result in effects that are beneficial to human beings.

### **Mitigation Measures**

The proposed pilot projects would result in beneficial impacts to the environment; therefore no mitigation is required.

DRAFT