
Initial Study / Mitigated Negative Declaration

for:

**EL CENTRO GENERATING STATION WASTEWATER
MITIGATION PROJECT**

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August 2023



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SECTION 1

I. INTRODUCTION

A. PURPOSE

This document is a policy-level, project level Initial Study for evaluation of potential environmental impacts resulting from the proposed improvements to the ECGS Wastewater facility to fulfill the discharge requirements necessary to comply with National Pollution Discharge Elimination System permit from the Regional Water Quality Control Board that contains new and more stringent limitations for the concentration of specific pollutants that are discharged in its waste stream.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REQUIREMENTS

As defined by Section 15063 of the State of California Environmental Quality Act (CEQA) Guidelines, an **Initial Study** is prepared primarily to provide the Lead Agency with information to use as the basis for determining whether an Environmental Impact Report (EIR), Negative Declaration, or Mitigated Negative Declaration would be appropriate for providing the necessary environmental documentation and clearance for any proposed project.

According to Section 15065, an **EIR** is deemed appropriate for a particular proposal if the following conditions occur:

- The proposal has the potential to substantially degrade quality of the environment.
- The proposal has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.
- The proposal has possible environmental effects that are individually limited but cumulatively considerable.
- The proposal could cause direct or indirect adverse effects on human beings.

According to Section 15070(a), a **Negative Declaration** is deemed appropriate if the proposal would not result in any significant effect on the environment.

According to Section 15070(b), a **Mitigated Negative Declaration** is deemed appropriate if it is determined that though a proposal could result in a significant effect, mitigation measures are available to reduce these significant effects to insignificant levels.

This Initial Study is prepared in conformance with the California Environmental Quality Act of 1970, as amended (Public Resources Code, Section 21000 et. seq.); Section 15070 of the State & County of Imperial's Guidelines for Implementation of the California Environmental Quality Act of 1970, as amended (California Code of Regulations, Title 14, Chapter 3, Section 15000, et. seq.); applicable requirements of the Imperial Irrigation District (IID); and the regulations, requirements, and procedures of any other responsible public agency or an agency with jurisdiction by law.

The IID is designated the Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the principal responsibility for approving the necessary environmental clearances and analyses for the project.

C. INTENDED USES OF INITIAL STUDY

This Initial Study is an informational document which is intended to inform the IID decision makers, other responsible or interested agencies, and the general public of potential environmental effects of the proposed applications. The environmental review process has been established to enable public agencies to evaluate environmental consequences and to examine and implement methods of eliminating or reducing any potentially adverse impacts. While CEQA requires that consideration be

given to avoiding environmental damage, the Lead Agency and other responsible public agencies must balance adverse environmental effects against other public objectives, including economic and social goals.

The Initial Study prepared for the project will be circulated for a period of 35 days for public and agency review and comments. At the conclusion, if comments are received, the IID will prepare a document entitled "Responses to Comments" which will be forwarded to any commenting entity and be made part of the record within 10-days of any project consideration.

D. CONTENTS OF INITIAL STUDY

This Initial Study is organized to facilitate a basic understanding of the existing setting and environmental implications of the proposed application.

SECTION 1

I. INTRODUCTION presents an introduction to the entire report. This section discusses the environmental process, scope of environmental review, and incorporation by reference documents.

SECTION 2

II. ENVIRONMENTAL CHECKLIST FORM contains the Environmental Checklist Form. The checklist form presents results of the environmental evaluation for the proposed applications and those issue areas that would have either a significant impact, potentially significant impact, or no impact.

PROJECT SUMMARY, LOCATION AND ENVIRONMENTAL SETTINGS describes the proposed project entitlements and required applications. A description of discretionary approvals and permits required for project implementation is also included. It also identifies the location of the project and a general description of the surrounding environmental settings.

ENVIRONMENTAL ANALYSIS evaluates each response provided in the environmental checklist form. Each response checked in the checklist form is discussed and supported with sufficient data and analysis as necessary. As appropriate, each response discussion describes and identifies specific impacts anticipated with project implementation.

SECTION 3

III. MANDATORY FINDINGS presents Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

IV. PERSONS AND ORGANIZATIONS CONSULTED identifies those persons consulted and involved in preparation of this Initial Study and Negative Declaration.

V. REFERENCES lists bibliographical materials used in preparation of this document.

VI. FINDINGS

SECTION 4

VII. RESPONSE TO COMMENTS (IF ANY)

VIII. MITIGATION MONITORING & REPORTING PROGRAM (MMRP) (IF ANY)

E. SCOPE OF ENVIRONMENTAL ANALYSIS

For evaluation of environmental impacts, each question from the Environmental Checklist Form is summarized and responses are provided according to the analysis undertaken as part of the Initial Study. Impacts and effects will be evaluated and quantified, when appropriate. To each question, there are four possible responses, including:

-
1. **No Impact:** A “No Impact” response is adequately supported if the impact simply does not apply to the proposed applications.
 2. **Less Than Significant Impact:** The proposed applications will have the potential to impact the environment. These impacts, however, will be less than significant; no additional analysis is required.
 3. **Less Than Significant with Mitigation Incorporated:** This applies where incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact”.
 4. **Potentially Significant Impact:** The proposed applications could have impacts that are considered significant. Additional analyses and possibly an EIR could be required to identify mitigation measures that could reduce these impacts to less than significant levels.

F. POLICY-LEVEL or PROJECT LEVEL ENVIRONMENTAL ANALYSIS

This Initial Study will be conducted under a policy-level, project level analysis. Regarding mitigation measures, it is not the intent of this document to “overlap” or restate conditions of approval that are commonly established for future known projects or the proposed applications. Additionally, those other standard requirements and regulations that any development must comply with, that are outside the IID’s jurisdiction, are also not considered mitigation measures and therefore, will not be identified in this document.

G. TIERED DOCUMENTS AND INCORPORATION BY REFERENCE

Information, findings, and conclusions contained in this document are based on incorporation by reference of tiered documentation, which are discussed in the following section.

1. Tiered Documents

As permitted in Section 15152(a) of the CEQA Guidelines, information and discussions from other documents can be included in this document. Tiering is defined as follows:

“Tiering refers to using the analysis of general matters contained in a broader EIR (such as the one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.”

Tiering also allows this document to comply with Section 15152(b) of the CEQA Guidelines, which discourages redundant analyses, as follows:

“Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including the general plans, zoning changes, and development projects. This approach can eliminate repetitive discussion of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy, or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration.”

Further, Section 15152(d) of the CEQA Guidelines states:

“Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to effects which:

-
- (1) Were not examined as significant effects on the environment in the prior EIR; or
 - (2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means.”

2. Incorporation by Reference

Incorporation by reference is a procedure for reducing the size of EIRs/MND and is most appropriate for including long, descriptive, or technical materials that provide general background information, but do not contribute directly to the specific analysis of the project itself. This procedure is particularly useful when an EIR or Negative Declaration relies on a broadly-drafted EIR for its evaluation of cumulative impacts of related projects (*Las Virgenes Homeowners Federation v. County of Los Angeles* [1986, 177 Ca.3d 300]). If an EIR or Negative Declaration relies on information from a supporting study that is available to the public, the EIR or Negative Declaration cannot be deemed unsupported by evidence or analysis (*San Francisco Ecology Center v. City and County of San Francisco* [1975, 48 Ca.3d 584, 595]).

When an EIR or Negative Declaration incorporates a document by reference, the incorporation must comply with Section 15150 of the CEQA Guidelines as follows:

- The incorporated document must be available to the public or be a matter of public record (CEQA Guidelines Section 15150[a]). This document must be available for inspection by the public at an office of the lead agency (CEQA Guidelines Section 15150[b]).
- These documents must summarize the portion of the document being incorporated by reference or briefly describe information that cannot be summarized. Furthermore, these documents must describe the relationship between the incorporated information and the analysis in the tiered documents (CEQA Guidelines Section 15150[c]). As discussed above, the tiered EIRs address the entire project site and provide background and inventory information and data which apply to the project site. Incorporated information and/or data will be cited in the appropriate sections.
- These documents must include the State identification number of the incorporated documents (CEQA Guidelines Section 15150[d]).

The material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]). This has been previously discussed in this document.

SECTION 2

II. ENVIRONMENTAL CHECKLIST

- 1. Project Title:** El Centro Generating Station (ECGS) Wastewater Mitigation Project
- 2. Lead Agency:** Imperial Irrigation District
- 3. Contact person and phone number:** Donald Vargas, Compliance Administrator II
- 4. Address:** 333 E. Barioni Blvd., Imperial, CA
- 5. E-mail:** dvargas@iid.com
- 6. Project location:** Northwest corner of Dogwood Road and Villa Avenue (Figure 1)
- 7. Project sponsor's name and address:** Imperial Irrigation District
- 8. General Plan designation:** Urban Area
- 9. Zoning:** A2U - General Agriculture Zone, Urban Areas (upon permit/development applicable Urban area regulations will be followed).
- 10. Description of project:** The proposed project involves achieving zero discharge from the ECGS Wastewater facility through reducing liquid waste volumes and the use of proven treatment technologies. The ECGS will minimize the cooling tower blowdown by increasing the cycles of concentration (COC). Cooling tower circulating water blown down to maintain TDS below the Imperial County Air Pollution Control District air permit limits, the blowdown will be sent to a water softening reactor with the output of the reactor feeding the repurposed pond (Pond 3). This will allow the hardness to precipitate out of solution. The softened water will then be fed to an ultrafiltration (UF) and a reverse osmosis (RO) system. Following full treatment, the RO permeate will be recirculated for makeup use in the facility's cooling towers, while the small volume reject streams will be sent to evaporation ponds. The end goal of the project is to reach compliance with the updated waste discharge requirements of the National Pollution Elimination System (NPDES) permit issued to the facility by the Regional Water Quality Control Board (RWQCB).

Figure 2 shows the overall scope of the Project and includes the area just east of Pond 3 at the ECGS Wastewater facility (APN 044-430-008). All treatment equipment will be in this area including the motor control center power supply, pumping skids, control equipment, pipeline infrastructure, lime, and soda ash silos, two softening reactor tanks, an ultrafiltration system, and a RO system.

Reject streams generated from the treatment system will be sent via a low-pressure pipeline to new evaporation ponds to be constructed on the Bonanza site and the parcel to the north (APN 044-450-084 & APN 044-450-090).

The Bonanza Building and surrounding structures located at the northwest corner of Dogwood Road and Villa Avenue will be demolished to accommodate construction of the evaporation ponds. Based on the construction date of the Bonanza Building in 1987, no asbestos or lead were used. Testing for the presence of these materials was conducted in February of 2022 confirming that hazardous materials were nondetectable in the samples. As part of the demolition of the Bonanza Building, the underground septic systems will be cleaned and removed.

Figure 2 shows the general design of the three 3-acre, double lined evaporation ponds with intermediate monitoring. As shown, the area just east of Pond 3 at the ECGS Wastewater Facility (APN 044-430-008) will be impacted by new treatment equipment including motor control center (MCC) power supply, pumping skids, control equipment, pipeline infrastructure, lime, and soda ash silos, two softening reactor tanks, an ultrafiltration system, and the RO system.

The entire project site area of disturbance is 37.5 Acres (which includes 16.5 acres of evaporation ponds, 11 acres for Pond 3, a 2-acre treatment system, and 8 acres of linear facilities). Construction is anticipated to take between 180 and 230 days.

11. Surrounding land uses and setting:

12. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.): Imperial Irrigation District (IID), Imperial County Air Pollution Control District (ICAPCD), City of Imperial Planning Commission (PC).

13. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1?

If so, has consultation begun? Yes. Letters were sent to the following tribes and or agencies on July 14, 2023.

- Augustine Band of Cahuilla Mission Indians
- Fort Yuma Quechen Indian Tribe
- Historic Preservation Office
- Ipay Nation of Santa Ysabel
- Inayu – Cosmet Band of Indians
- International Tribal Cultural Resources Protection Council
- Januel Indian Village A Kumeyaay Nation
- Kumeyaay Cultural Repatriation Committee
- Kwaaymi Laguan Band of Mission Indians
- La Jolla Band of Luisena Indians
- La Posta Band of Mission Indians
- Los Coyotes Band of Cahuilla & Cupeno Indians
- Manzanita Band of Kumeyaay Nation
- Mesa Grande Band of Mission Indians
- Morongo Band of Mission Indians
- Pala Band of Mission Indians
- Pauma Band of Luiseño Indians
- Rincon Band of Luiseño Indians
- San Manuel Band of Mission Indians
- San Pasqual Band of Mission Indians
- Santa Rosa Band of Cahuilla Indians
- Soboba Band of Luiseño Indians
- Viejo Band of Mission Indians

The comment period closed on August 14, 2023. During this time, comments were received from:

-
- Jill McCormick M.A. Ft. Yuma Quechan Indian Tribe (Did not request consultation)
 - Lorrie Gregory, the Cultural Resource Coordinator for the Band of Cahuilla Indians (No comment, deferred to more local tribes)
 - Geramy Martin, Tribal Secretary Augustine Band of Cahuilla Indians (requested to be contacted if any resources were discovered)

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code, Section 21083.3.2). Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code, Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code, Section 21082.3 (c) contains provisions specific to confidentiality.



Photo 1: View southeast from internal roadway. Pipeline alignment would extend from building at right of photo.



Photo 2: View west from entry at Dogwood Road of internal road to the ECGS Wastewater Facility. Pipeline will be installed in the unpaved area at left of photo.



Photo 3: View west from Dogwood Road towards location of proposed treatment equipment.



Photo 4: View north along internal access road/pipeline alignment.



Photo 5: View north from Villa Avenue towards Bonanza Building and surrounding structures located at the northwest corner of Dogwood Road and Villa Avenue to be demolished to accommodate construction of the 9-acre, three cell evaporation pond.



Photo 6: View north from Villa Avenue towards Bonanza Building View and surrounding structures, located at the northwest corner of Dogwood Road and Villa Avenue to be demolished to accommodate construction of the 9-acre, three cell evaporation pond.



Photo 7: View north from Villa Avenue towards 9-acre, three cell evaporation pond area. Building at right will be demolished.



Photo 8: View north from Villa Avenue toward existing fish ponds.



Photo 9: View north from Villa Avenue towards location of 9-acre, three cell evaporation area. Bonanza Building and associated structures to be demolished are to the east.



Photo 10: View northeast from Villa Avenue towards Bonanza Building and surrounding structures located at the northwest corner of Dogwood Road and Villa Avenue be demolished to accommodate construction of the 9-acre, three cell evaporation pond.



Photo 11: View of concrete lined canal along west side of Dogwood Road (looking west).



Photo 12: View west from Dogwood Road of existing Bonanza Building and surrounding structures located at the northwest corner of Dogwood Road and Villa Avenue to be demolished to accommodate construction of the 9-acre, three cell evaporation pond.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture/Forestry Resources | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Greenhouse Gas | <input type="checkbox"/> Hazards and Hazardous Materials |
| <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

LEAD AGENCY'S ENVIRONMENTAL DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENT IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects, (1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE DE MINIMIS IMPACT FINDING: Yes No

Signature

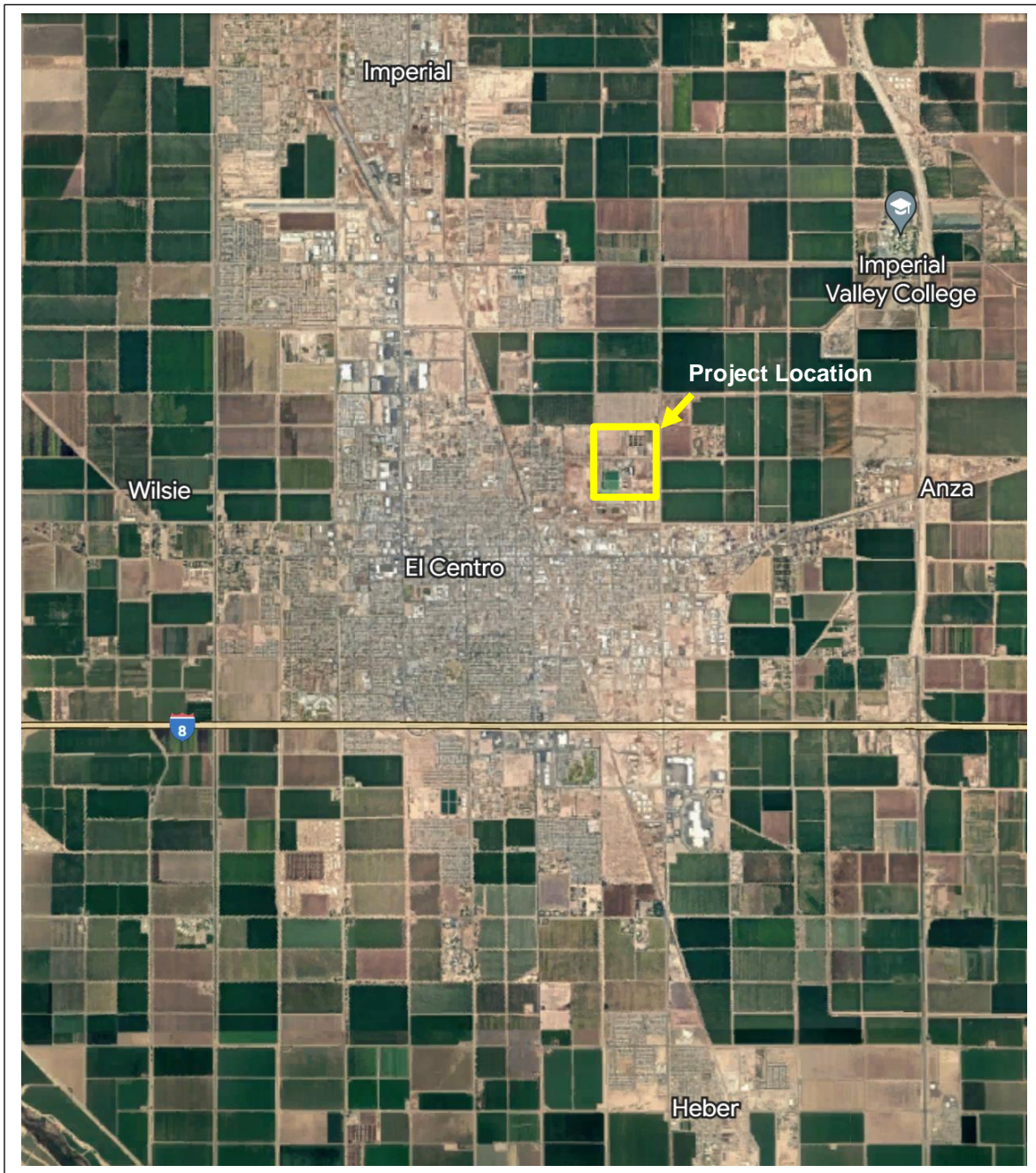
Date

Printed Name, Title

Lead Agency

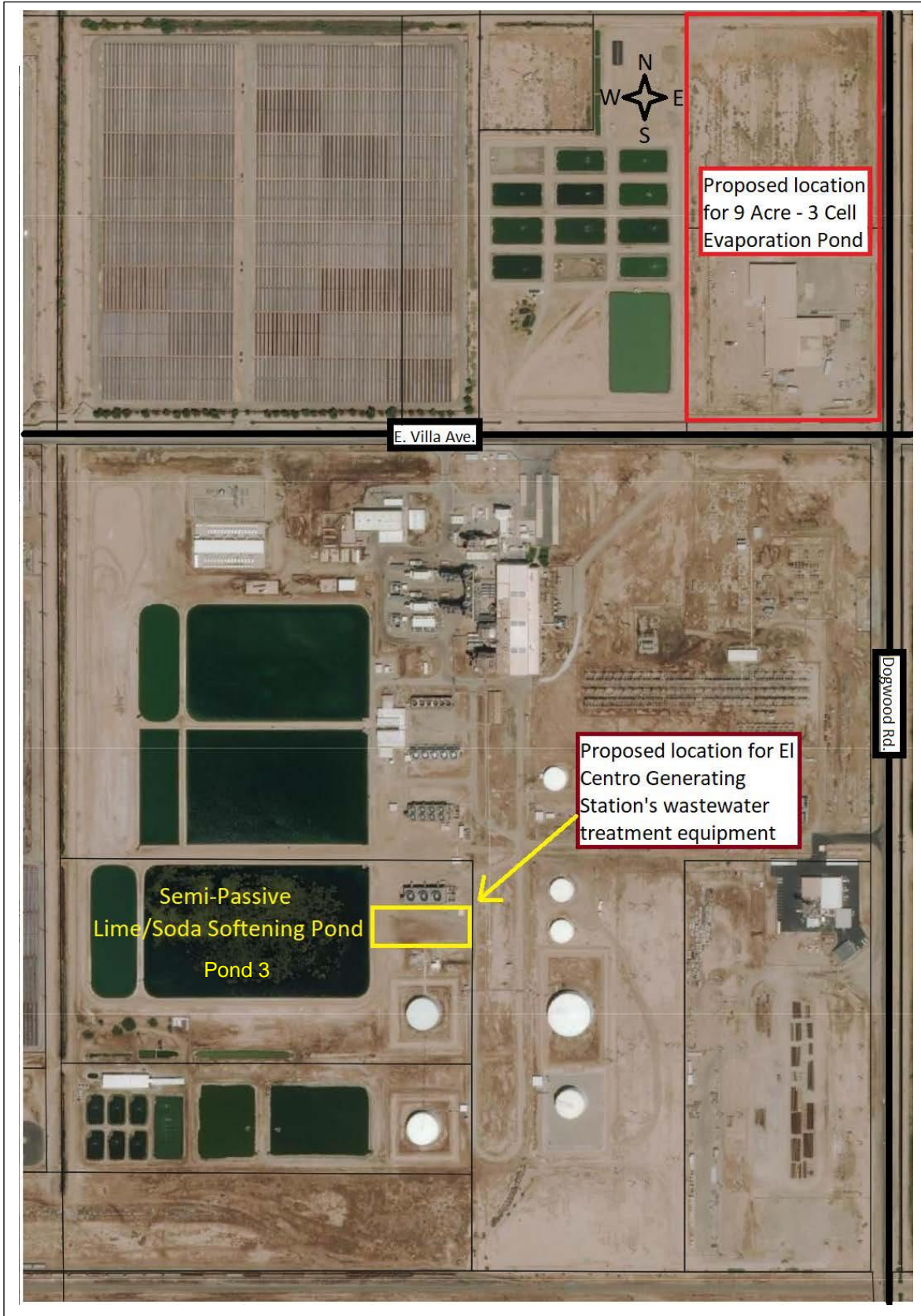
PROJECT SUMMARY

- A. Project Location:** The project is located at the Imperial Irrigation District's (IID) Bonanza Building site at the northwest and southwest corners of Dogwood Road and Villa Avenue in unincorporated Imperial County. The site is to the northeast of the City of El Centro (Figure 1).
- B. Project Summary:** The project consists of improvements to the IID El Centro Generating Station (ECGS) wastewater facilities to achieve new and more stringent limitations for the concentration of specific pollutants that are discharged in its waste stream to receive a renewed NPDES permit from the RWQCB. The project includes equipment to minimize the cooling tower blowdown by increasing the cycles of concentration (COC), a water softening reactor, a repurposed evaporation pond (Pond 3), an ultrafiltration (UF) and a reverse osmosis (RO) system (Figure 2). Three new evaporation ponds are proposed on the site of the existing Bonanza Building. These ponds will cover 9 acres and will have an interior slope of 6:1 and an exterior berm slope of 4:1. An 18-inch overflow pipe will connect the ponds (Figure 3).
- C. Environmental Setting:** Areas impacted by project implementation include the area just east of Pond 3 at the ECGS Wastewater facility (APN 044-430-008). The area is completely disturbed and has been developed with existing structures (i.e., the Bonanza Building, pavement, driveways, treatments ponds, etc.). (Figure 2) See photos 1 – 10.
- D. Analysis:** The project is the demolition of the existing Bonanza Building and surrounding structures located at the northwest corner of Dogwood Road and Villa Avenue and construction of a motor control center (MCC) power supply, pumping skids, control equipment, pipeline infrastructure, lime, and soda ash silos, two softening reactor tanks, an ultrafiltration system, and an RO system at the southwest corner of Dogwood Road and Villa Avenue. The block flow and process flow are graphically depicted in Figures 4a and 4b.
- E. General Plan Consistency:** The project is located within the existing boundaries of the IID ECGS Wastewater Treatment facility which is within Imperial County. A portion of the pipeline will extend through City of El Centro right-of-way.



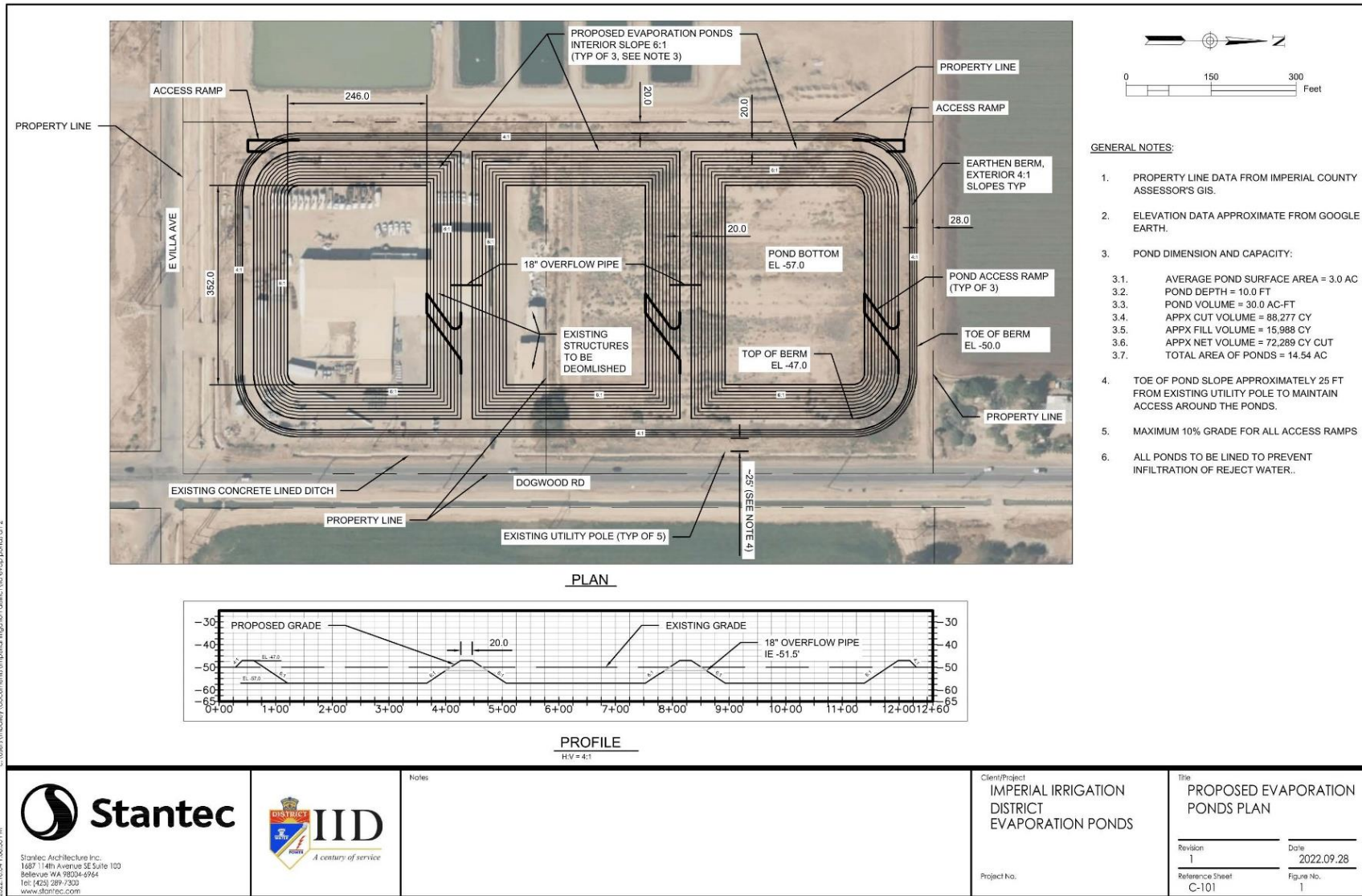
Base Map Source: Google Earth 2023.

Figure 1
Project Location Map



Source: IID 2023.

Figure 2
Project Site Plan



c:\users\jthibault\documents\imperial\fig0101\evap\evap ponds.dwg 10/13/22 10:08:30 PM



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Notes

Client/Project
IMPERIAL IRRIGATION DISTRICT
EVAPORATION PONDS

Project No.

Title
PROPOSED EVAPORATION PONDS PLAN

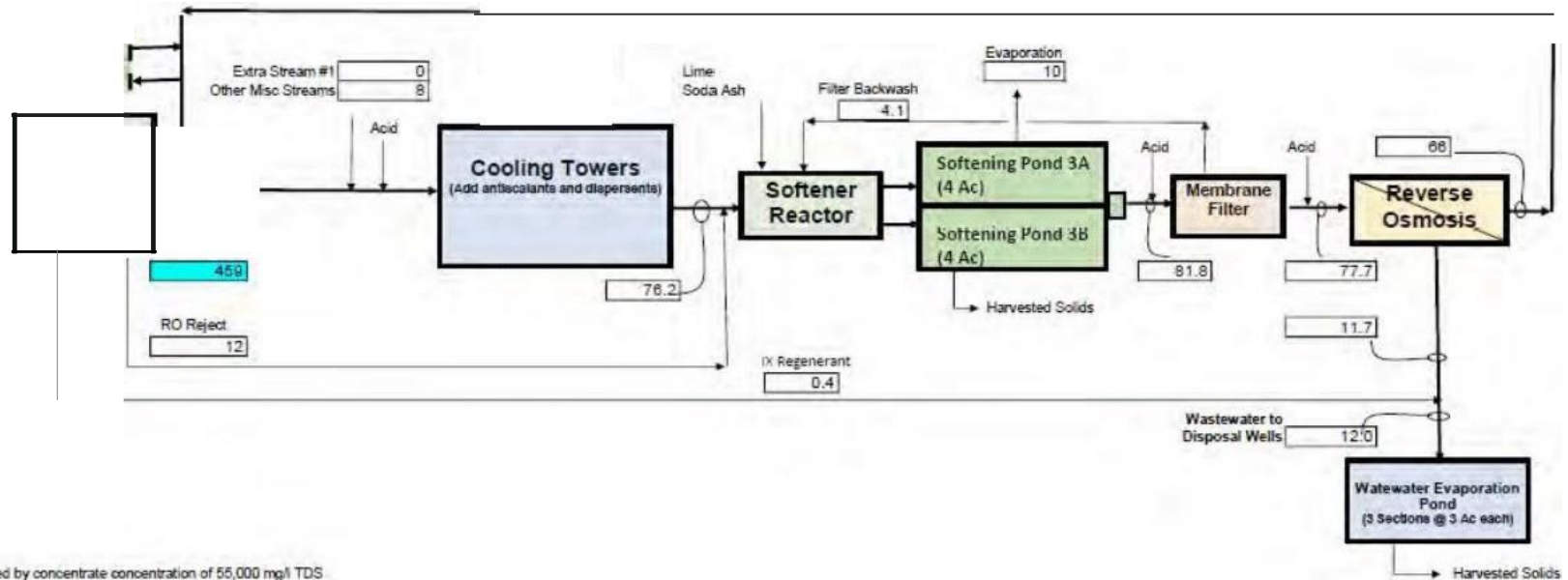
Revision 1	Date 2022.09.28
Reference Sheet C-101	Figure No. 1

Source: Stantec 2022.

Figure 3
Proposed Evaporation Ponds Plan

Water Balance Check

Cooling Tower In =	533 gpm
Cooling Tower Out =	532 gpm
Cooling Tower Cycles	7.0
Cooling Tower TDS	5156 mg/l
Total Water In =	480 gpm
Total Water Out =	478 gpm



Key Assumptions:

- 1. RO Recovery limited by concentrate concentration of 55,000 mg/l TDS

Source: IID 2023.

**Figure 4a
Block Flow Diagram**

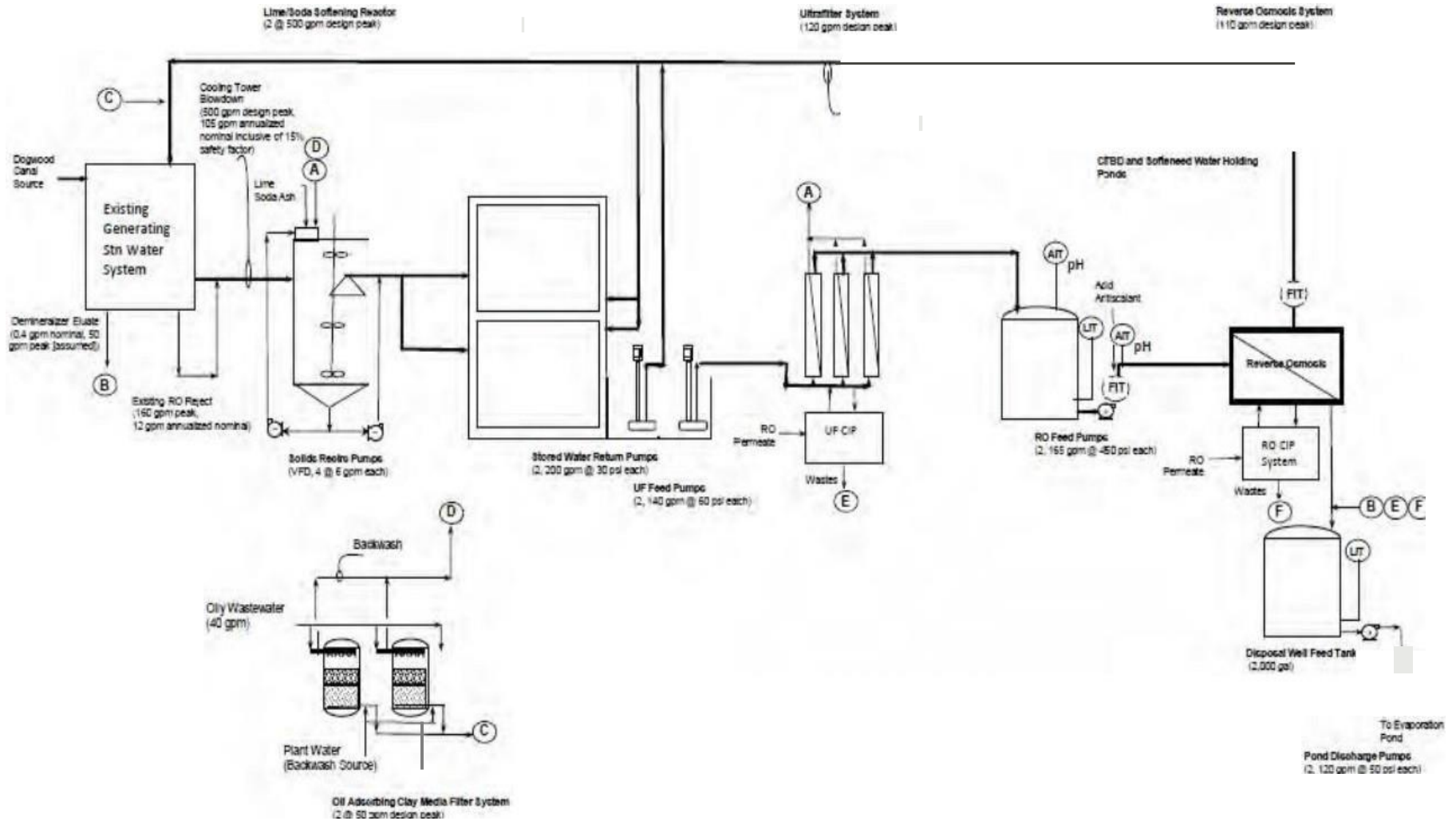


Figure 4b
Process Flow Diagram

Source: IID 2023.

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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I. AESTHETICS *Would the project:*

- a) Have a substantial adverse effect on a scenic vista or scenic highway?

No Impact. The proposed project is located within the existing boundaries of the EGCS Wastewater Facility and the Bonanza Building site at the northwest and southwest corners of Dogwood Road and Villa Avenue. The surrounding area is characterized by flat topography with agricultural fields to the north and east and the City of El Centro to the west and south. No scenic vistas are present, and no scenic highways align through the County of Imperial (Caltrans 2023). Therefore, the proposed project would have no impact on a scenic vista or scenic highway.

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

No Impact. The proposed project is located within the existing boundaries of the EGCS Wastewater Facility and the Bonanza Building site at the northwest and southwest corners of Dogwood Road and Villa Avenue. The facility does not contain any scenic resources including trees or rock outcroppings. The buildings on the site are not considered historic and have no unique aesthetic. Likewise, there are no scenic highways in the County of Imperial. Therefore, no impact would occur regarding damaging scenic resources within a state scenic highway.

- c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

No Impact. The proposed project borders the City of El Centro (an urbanized area) to the west and south, as well as agricultural land (a nonurbanized area) to the north and east. The proposed project would remove the existing Bonanza Building and other structures located at the northwest corner of Dogwood Road and Villa Avenue and replace these with a 9-acre, three cell evaporation pond. The change in features would not substantially degrade the existing industrial/agricultural visual character of the area nor would the project conflict with the A2U zoning or other regulations governing scenic quality. Therefore, no impact is identified for this issue area.

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

Less than Significant Impact. The ECGS Wastewater facility currently includes lights for nighttime illumination and safety. The proposed features of the project including the equipment and evaporation pond would not create new sources of glare. Lighting for safety purposes is proposed but would be directed downward to avoid light spillage onto adjacent properties. Therefore, a less than significant impact regarding creating a new source of substantial light or glare which would adversely affect day or nighttime views is considered less than significant.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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II. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. 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?

No Impact. The proposed project is designated as Urban and Built-Up land on the Imperial County Important Farmland 2018 Map prepared by the California Department of Conservation (DOC), Division of Land Resource Protection, Farmland Mapping and Monitoring Program (FMMP). Thus, the project would have no impact on converting Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use.

- b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?

No Impact. The project includes buildings within the boundaries of IID property and the proposed pipeline alignment extends through IID property as well as City of El Centro right-of-way. None of the land impacted by the project is zoned for agricultural use or under a Williamson Act Contract. Therefore, the proposed project would not conflict with the existing Agricultural zoning or surrounding Williamson Act Contracts in non-renewal. The project would have not impact on agricultural zoning or a Williamson Act Contract.

- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No Impact. Based on the Imperial County General Plan, Conservation and Open Space Element, mixed chaparral, pinyon-juniper habitats, and the montane hardwood-conifer forest are in restricted areas of the County. Mixed chaparral and pinyon-juniper habitats are in the extreme southwestern corner of the County and montane hardwood-conifer forest is in the extreme northwestern corner of Imperial County. Thus, there are no existing forest lands, timberlands, or timberland zoned Timberland Production either on or near the project site that would conflict with existing zoning. No impact would occur.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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- d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. There are no existing forest lands either on-site or in the immediate vicinity of the project site. The proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact is identified for this issue area.

- e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. As previously noted, all features of the proposed project are located on land owned by the IID or within existing County right-of-way. The project would not convert any Farmland to a non-agricultural use or forest land to a non-forest use.

III. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to the following determinations. Would the Project:

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

Less than Significant Impact. The proposed project is the demolition of the existing Bonanza Building and construction of new equipment, ponds, and a pipeline as part of the ECGS wastewater facility. Short-term air quality emissions would be generated during demolition and construction. Once operational, the project would generate minimal emissions in association with the existing facilities at the treatment plant including pumps, ponds, etc. The project will comply with all applicable ICAPCD Rules and Regulations as well as with all applicable State and federal requirements for attainment of air quality objectives. Therefore, the project's impact regarding conflicting with or obstructing implementation of an applicable air quality plan is considered less than significant.

- b) 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?

Less than Significant Impact. The project site is in a nonattainment area for ozone and PM10. This means that the background levels of these pollutants are at times higher than the ambient air quality standards. The air quality standards were set to protect the health of sensitive individuals (i.e., elderly, children, and the sick). Therefore, when the concentration of those pollutants exceeds the standard, it is likely that some of the sensitive individuals of the population experience adverse health effects.

Once demolition and construction are complete, minor emissions would be generated in association with operation of the proposed treatment facility. Minor operational emissions would be produced by new treatment equipment including motor control center (MCC) power supply, pumping skids, and control equipment utilized to pump water through the pipeline infrastructure into soda ash silos, softening reactor tanks, an ultrafiltration system, and the RO system. Therefore, the project will not exceed the ICAPCD's Regional Operational Thresholds. No localized significance threshold would be exceeded during project operations. Therefore, the proposed project would not 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.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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- c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. The nearest sensitive receptors to the project site are homes located approximately one-half mile or more to the west along 3rd Street. The amount of demolition and construction emissions generated would be limited and for a short duration (i.e., three to four days a week for two to three weeks). Based on the scope and location of the project, no sensitive receptors would be exposed to prolonged or substantial pollutant concentrations. Therefore, the proposed project would result in less than significant impacts regarding exposing sensitive receptors to substantial pollutant concentrations.

- d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than Significant Impact. Potential odor impacts depend on multiple factors including the type of odor generated; the intensity of the source; the sensitivity of the receptor; the intensity of the source; and the direction and speed of the wind. Odors present a nuisance to the public and result in citizen complaints. During demolition construction, exhaust from equipment (trucks, earthmoving equipment) may produce odors typically resulting from dust and heavy equipment. Odors produced during construction generally consist of unburned hydrocarbons from tailpipes of construction equipment. Construction emission odors typically disperse rapidly and do not affect substantial numbers of people due to the localized area affected. Therefore, odors adversely affecting a substantial number of people is considered less than significant.

IV. BIOLOGICAL RESOURCES 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 Wildlife or U.S. Fish and Wildlife Service?

The following discussion is based on the *Biological Technical Report for the El Centro Generating Station Wastewater Mitigation Project* prepared for the Project Area prepared by ECORP Consulting, Inc. The "Project Area" refers to the areas proposed to be directly impacted by the project and the term Survey Area refers to the areas proposed to be directly impacted by the project, the 500-foot buffer, and areas potentially subject to temporary impacts (see Figure 5).

Prior to conducting the biological reconnaissance survey on June 6, 2023, ECORP biologists performed a literature review using the CDFW's California Natural Diversity Data Base (CNDDDB; CDFW 2023) and the California Native Plant Society's (CNPS') Electronic Inventory (CNPSEI; CNPS 2023) to determine the special-status plant and wildlife species that have been documented in the vicinity of the project (ECORP 2023a, p. 8).

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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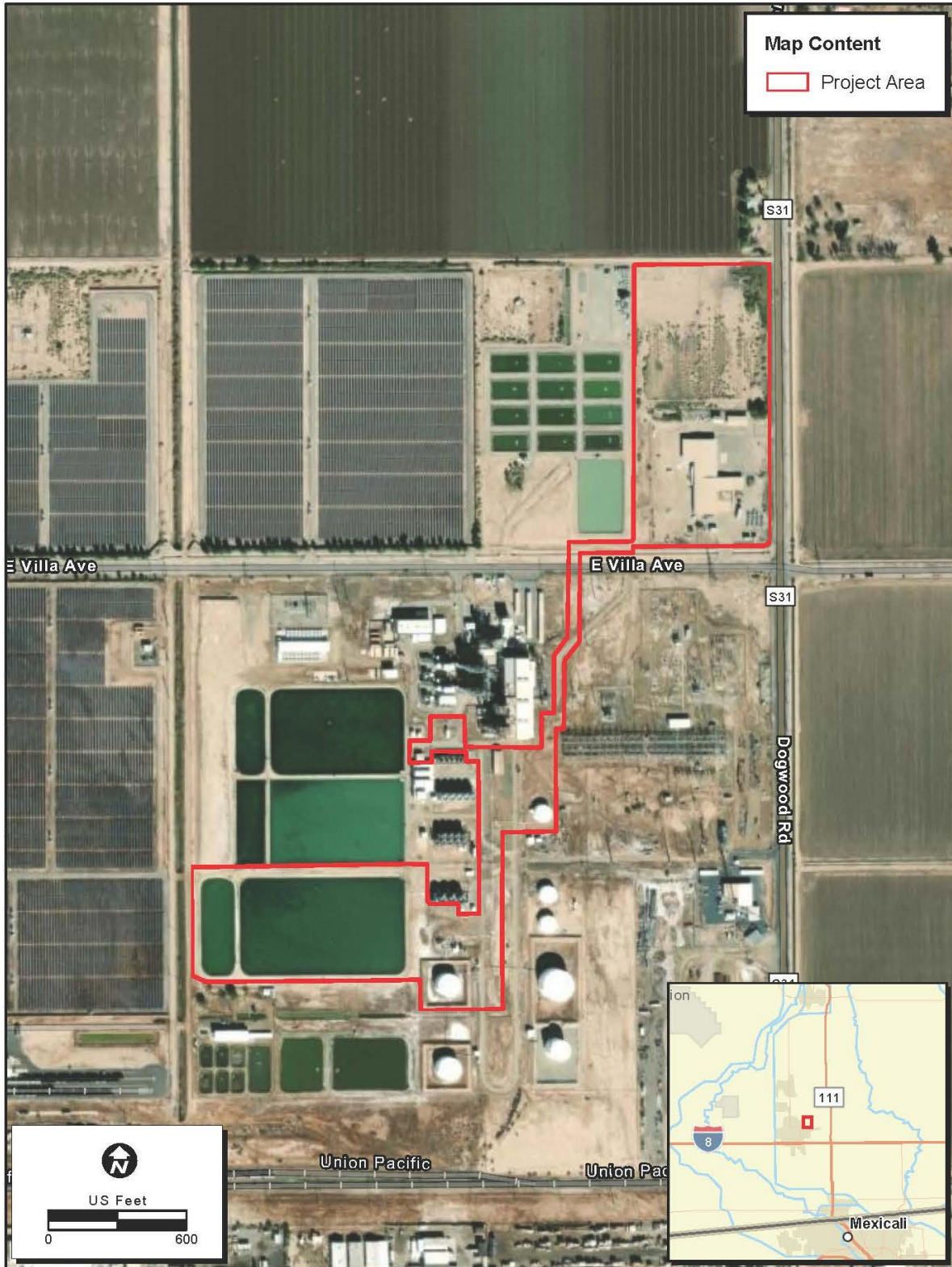


Figure 5
Vegetation Communities & Land Cover Types

Source: ECORP 2023.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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a) **Potentially Significant Unless Mitigation Incorporated.** A biological reconnaissance survey was conducted on June 6, 2023. Most of the Project Area consists of urban/developed land consisting of structures and facilities associated with the generation station and most of the Bonanza site in the northern portion of the site with disturbed land in the western portion of that area. Disturbed big saltbush scrub and tamarisk thicket are classified as vegetation communities and present near the northern end of the Project Area.

Special-status plants and wildlife species reported for the region in the literature review, or for which suitable habitat occurs, were evaluated for their potential to occur within the Project Area or in the buffer areas within the Survey Area where indirect impacts could occur. Of all available records, a total of 16 special-status plant species and 22 special-status wildlife species were identified as having the potential for occurrence in the vicinity of the Project Area (Refer to Appendices A and B of Attachment A, Biological Technical Report of this document).

Special Status Plant Species

Special-status plants were evaluated for their potential to occur within the project limits where impacts could occur. Special-status wildlife were evaluated for their potential to occur within the Area, a broader area which includes the Project Area and buffer, where direct or indirect impacts could occur. Of all available records, a total of 16 species were identified as those with the potential for occurrence within the vicinity of the Project Area. Of these 16 species none had a high or moderate potential to occur. The five species identified in Table BIO-1 were found to have a low potential to occur on the Project Area because limited habitat for the species occurs on the site and a known occurrence has been reported in the database, but not within 5 miles of the site, or suitable habitat strongly associated with the species occurs on the site, but no records were found in the database search.

**Table BIO-1
Plant Species with Low Potential to Occur**

Specie	California Rare Plant Rank
Walton’s amaranth (<i>Amaranthus watsonii</i>)	1B.1 - Plants Rare, Threatened, or Endangered in California and Elsewhere. Seriously threatened in California (over 80 percent of occurrences threatened / high degree and immediacy of threat).
gravel milk-vetch (<i>Astragalus sabulorum</i>)	2B.2 Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere. Moderately threatened in California (20-80 percent occurrences threatened/moderate degree and immediacy of threat).
Abram’s spurge (<i>Euphorbia abramsiana</i>)	2B.2 Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere. Moderately threatened in California (20-80 percent occurrences threatened/moderate degree and immediacy of threat).
ribbed cryptantha (<i>Johnstonella costata</i>)	4.3 - Plants of limited distribution; a watch list. Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known).
sand food (<i>Pholisma sonorae</i>)	1B.2 Plants Rare, Threatened and Endangered in California and Elsewhere. Moderately threatened in California (20-80 percent occurrences threatened/moderate degree and immediacy of threat).

Source: ECORP 2023a, pp. 15 & 16.

Due to the low likelihood of occurrence of the special status plans identified in Table BIO-1, the likelihood of impact to these or any specials status plant species is expected to be less than significant.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Of the 22 special-status wildlife species identified in the literature review, none were present within the Project Area, none were found to have a high potential to occur, three were found to have a moderate potential to occur, and 12 were found to have a low potential to occur; the remaining seven species (Crotch bumble bee (*Bombus crotchii*), state listed candidate; Sonoran desert toad (*Incilius alvarius*), CDFW SSC; northern leopard frog (*Lithobates pipiens*), CDFW SSC; lowland leopard frog (*Lithobates yavapaiensis*), CDFW SSC; Crissal thrasher (*Toxostoma crissale*), CDFW SSC; yellow warbler (*Setophaga petechia*), CDFW SSC; California black rail (*Laterallus jamaicensis ssp. coturniculus*), state listed threatened, are presumed absent from the Project Area (ECORP 2023a, pp. 15 & 16).

**Table BIO-2
Special Status Species**

Species	Potential to Occur	Wildlife Status Designation
Burrowing owl (<i>Athene cunicularia</i>)	Moderate	USFWS Bird of Conservation Concern (BCC) and CDFW, California Species of Special Concern
Western mastiff bat (<i>Eumops perotis ssp. californicus</i>)	Moderate	CDFW, California Species of Special Concern
Colorado Desert fringe-toed lizard (<i>Uma notata</i>)	Low	CDFW, California Species of Special Concern
Yuma hispid cotton rat (<i>Sigmodon hispidus eremicus</i>)	Low	CDFW, California Species of Special Concern
flat-tailed horned lizard (<i>Phrynosoma mcallii</i>)	Low	CDFW, California Species of Special Concern
ferruginous hawk (<i>Buteo regalis</i>)	Low	State wait listed
mountain plover (<i>Charadrius montanus</i>)	Low	USFWS BCC, CDFW, California Species of Special Concern
Yuma Ridgway's rail (<i>Rallus obsoletus ssp. yumanensis</i>)	Low	federally listed endangered, state listed threatened, and CDFW FP,
vermillion flycatcher (<i>Pyrocephalus rubinus</i>),	Low	CDFW, California Species of Special Concern
Gila woodpecker (<i>Melanerpes uropygialis</i>)	Low	State listed endangered
Palm Springs pocket mouse (<i>Perognathus longimembris bangsi</i>)	Low	CDFW, California Species of Special Concern
big free-tailed bat (<i>Nyctinomops macrotis</i>)	Low	CDFW, California Species of Special Concern
pocketed free-tailed bat. (<i>Nyctinomops femorosaccus</i>)	Low	CDFW, California Species of Special Concern
American badger (<i>Taxidea taxus</i>)	Low	CDFW, California Species of Special Concern
western yellow bat (<i>Lasiurus xanthinus</i>)	Low	CDFW, California Species of Special Concern

Source: ECORP 2023a, pp. 18-19.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Direct impacts to burrowing owl and western mastiff bat include injury, mortality, nest failures, and loss of young. Indirect impacts include loss of nesting, roosting, and foraging habitat, and increase in adverse anthropogenic effects (i.e., noise levels, introduction of invasive/nonnative species, increase in human activity, increase in dust). Impacts to these species could be considered significant; therefore, implementation of BIO-1 and BIO-2 is recommended.

Foraging habitat for several raptor species and breeding habitat for numerous passerine species that are protected by the MBTA occurs throughout the Project Area. The site provides nesting habitat for ground-nesting species as well as species that nest in tamarisk thicket and big saltbush scrub habitats. Due to the lack of large trees within the Survey Area, there is no suitable nesting habitat for tree-nesting raptor species. Direct impacts to nesting avian species include injury, mortality, loss of young, and nest failure. Indirect impacts include loss of foraging and nesting habitat for passerine and raptors species, increase in noise and human activities, potential introduction of invasive/nonnative species. Implementation of BIO-3 is recommended to mitigate potential impacts.

Therefore, the proposed project would have a potentially significant impact on special status species unless mitigation is incorporated.

Mitigation Measures

BIO-1: Bat Management and Habitat Assessment: A qualified biologist will conduct a bat habitat assessment for suitable bat roosting habitat prior to any construction activities. The habitat assessment should be conducted at least one year prior to the initiation of construction activities, if feasible. If no suitable roosting habitat is identified, no further measures are necessary. If suitable roosting habitat and/or signs of bat use are identified during the assessment, the roosting habitat should be avoided to the extent possible. If the habitat assessment surveys reveal potential bat roosting habitat within the project, a Bat Management Plan that will include specific avoidance and minimization measures to reduce impacts to roosting bats shall be prepared and consultation with CDFW initiated prior to the commencement of bat exclusion activities should they occur. The project-specific Bat Management Plan may include any of the following as necessary and appropriate to the findings of the habitat assessment: emergence and/or pre-construction surveys for roosting bats including acoustic monitoring, roost removal timing and methodology, no-disturbance or temporal buffers, passive exclusion of bats, and/or species-specific replacement structures.

Timing/Implementation: Prior to construction.

Enforcement/Monitoring: Imperial Irrigation District.

BIO-2: Pre-Construction Surveys for Burrowing Owl: Pre-construction surveys for burrowing owl should be conducted within the Project Area and adjacent areas prior to the start of ground- disturbing activities. The surveys should follow the methods described in the CDFW's *Staff Report on Burrowing Owl Mitigation* (CDFG 2012). Two surveys should be conducted, with the first survey being conducted between 30 and 14 days before initial ground disturbance (grading, grubbing, and construction), and the second survey being conducted no more than 24 hours prior to initial ground disturbance. If burrowing owls and/or suitable burrowing owl burrows with sign (e.g., whitewash, pellets, feathers, prey remains) are identified on the Project Area during the survey and impacts to those features are unavoidable, consultation with the CDFW should be conducted and the methods

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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described in the CDFW's *Staff Report on Burrowing Owl Mitigation* (CDFG 2012) for avoidance and/or passive relocation should be followed.

Timing/Implementation: Prior to construction.

Enforcement/Monitoring: Imperial Irrigation District.

BIO-3: Pre-Construction Nesting Bird Survey: If construction or other project activities are scheduled to occur during the bird breeding season (Typically February 1 through August 31 for raptors and March 15 through August 31 for the majority of migratory bird species), a pre-construction nesting-bird survey should be conducted by a qualified avian biologist to ensure that active bird nests, including those for the black-tailed gnatcatcher, burrowing owl, and loggerhead strike, will not be disturbed or destroyed. The survey should be completed no more than three days prior to initial ground disturbance. The nesting-bird survey should include the Project Area and adjacent areas where project activities have the potential to affect active nests, either directly or indirectly due to construction activity or noise. If an active nest is identified, the biologist should establish an appropriately sized disturbance limit buffer around the nest using flagging or staking. Construction activities should not occur within any disturbance limit buffer zones until the nest is deemed inactive by the qualified biologist.

Timing/Implementation: Prior to construction.

Enforcement/Monitoring: Imperial Irrigation District.

Following implementation of mitigation measures BIO-1, BIO-2, and BIO-3, impacts to special status wildlife would be reduced to less than significant.

- 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 Wildlife or U.S. Fish and Wildlife Service?

No Impact. As discussed under item a) above, the proposed project buildings and pipeline alignment are completely within previously disturbed IID property and County right-of-way. The only potentially jurisdictional aquatic resource feature within the site is an active irrigation canal on the north side of East Villa Avenue. These areas are largely kept free of vegetation through routine maintenance although weeds are present in some locations. However, no riparian vegetation is present. Therefore, the proposed project would have no impact on any riparian habitat or other sensitive natural community.

- 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?

No Impact. No aquatic resources were identified for the Survey Area. The only potentially jurisdictional aquatic resource feature within the site is an active irrigation canal on the north side of East Villa Avenue. Therefore, the project would not have a substantial adverse effect on federally protected wetlands.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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- d) Interfere substantially with the movement of any 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?
- | | | | |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|-------------------------------------|--------------------------|

Less than Significant Impact. Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the migration of animals. The Project Area was assessed for its ability to function as a wildlife corridor. The Project Area does not provide any wildlife movement or corridor functions due to existing disturbances related to human presence, noise, and other disturbances that preclude or dissuade wildlife from utilizing the Project Area. Many of the species that are commonly found in urban environments, such as those within the Project Area, do not have specific movement corridor requirements but instead use non-specific movement patterns across these urban areas. While the proposed project poses no risk of permanently decreasing the existing habitat connectivity, work associated with the proposed project may temporarily impact wildlife movement due to construction disturbance and noise.

As the impact to migratory wildlife corridors would be temporary and limited to the construction period, this impact is considered less than significant.

- e) Conflict with any local policies or ordinance protecting biological resource, such as a tree preservation policy or ordinance?
- | | | | |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|-------------------------------------|--------------------------|

Less than Significant Impact. As discussed under item a) above, the proposed project buildings and pipeline alignment are completely within previously disturbed IID property and City of El Centro right-of-way. The potential for biological resources within the alignment is low. The County of Imperial has policies related to protection of burrowing owls (*Athene cunicularia*). Although burrowing owls are known to create habitat in the brims and banks of agricultural fields and canals, the noise and activity surrounding the proposed alignment would make the area unfavorable for the species. Therefore, proposed project is anticipated to have a less than significant impact regarding local policies or ordinances protecting burrowing owl.

- 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"/> |
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No Impact. The project will follow the guidelines in Imperial County's Conservation and Open Space Element and meet the requirements outlined in the plan. Consultation with County of Imperial - Department of Planning and Development, USFWS, and CDFW would be required should listed plant and/or wildlife species be found to occur. No impact would occur.

V. CULTURAL RESOURCES Would the project:

- 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"/> |
|--------------------------|-------------------------------------|--------------------------|--------------------------|

Potentially Significant Impact Unless Mitigation is Incorporated. An Archaeological Resources Inventory and Evaluation Report was prepared for the Project by ECRP Consulting (July 2023) (This Report is included as Attachment B to this document). The inventory included a

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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records search, literature review, and field survey. The records search results indicated that 19 previous cultural resources studies have been conducted within the Project Area. As a result of those studies, two resources cross through the Project Area: P-13-009016, an electrical transmission line; and P-13-014314, East Villa Road.

Resources P-13-009016 and P-13-014314 have not been evaluated using National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR) eligibility criteria; therefore, it is not currently known whether any of these are considered historical resources under CEQA or historic properties under Section 106 NHPA (if applicable). Based on current project design, these resources are not expected to be impacted by project-related activities. If the Project design changes in a manner that either resource will be impacted, then it will need to be evaluated for eligibility for listing in the CRHR or NRHP. The process of evaluation requires a combination of archival research if sites are not presumed eligible. If found to be eligible for the NRHP or CRHR, a determination would then need to be made about whether the project would have a significant effect on the qualities that made them significant. Efforts to avoid, reduce, or mitigate those impacts would be needed if any significant resources were adversely affected by the project. Additional mitigation may be required by the lead agencies if either is found significant.

As a result of the field survey, ECORP recorded one new cultural resource within the Project Area: ECGS-1, an abandoned irrigation lateral for an agricultural field. It originates at an abandoned lined irrigation lateral that is parallel with Dogwood Road and extends 150 meters westward from that point to the western end of the agricultural field. The headgate for the lateral has been removed and only a few pieces of it remain. It is an unlined lateral, approximately 30 inches deep and 6 feet wide at the top of the lateral. Irrigation outlets are concrete, 10 inches in diameter, and have manual openings to allow water into the field. Irrigation features of this design do not contain subsurface deposits. In its current condition, it is partially overgrown with mallow and mesquite duff from the nearby mesquite trees adjacent to Dogwood Road.

ECGS-1 has been evaluated using the National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR) eligibility criteria and was found not eligible for listing on either register.

Four other historic-period built environment items were observed and noted within the Project Area: an evaporation pond, two large containment tanks, and a lined irrigation lateral. Construction-related activities will avoid these resources, and therefore, these were not recorded or evaluated. Because these have not been evaluated, they should be treated as eligible with mitigation incorporated to protect such resources. Therefore, impacts to the four historic-period built items are considered potentially significant unless mitigation is incorporated.

Mitigation Measures

CUL-1 An archaeological monitor shall be present during project-related ground-disturbing activities.

Timing/Implementation: During project grading and construction.

Enforcement/Monitoring: Imperial Irrigation District.

CUL-2 A fencing plan shall be developed to ensure that these resources are excluded from all work areas during construction.

Timing/Implementation: Developed and installed prior to construction.

Enforcement/Monitoring: Imperial Irrigation District.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

No Impact. The project is proposed in areas that have been extensively disturbed by construction of the existing IID wastewater treatment plant and County roads. Any archaeology that was present within these areas would have been disturbed and would no longer remain intact. Excavation to install pipeline is limited to 3 feet and no other aspect of the project requires deep excavation or substantial earth movement of the pipeline and ECGS equipment, no impact is identified regarding an archeological resource.

- c) Disturb any human remains, including those interred outside of dedicated cemeteries?

No Impact. As described in item a) above, it is not likely that human remains would be found on the project site based on years of disturbance. In addition, a search of the Sacred Lands File by the NAHC failed to indicate the presence of Native American cultural resources in the Project Area (ECORP 2023b, p. 25). Therefore, no impact to human remains is anticipated. Nevertheless, mitigation is identified if previously unknown human remains were to be discovered.

CUL-3: Human Remains Discovery. If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior’s Professional Qualification Standards for prehistoric and historic archaeology, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find: • If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately, and no agency notifications are required. • If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, the archaeologist shall immediately notify the lead agencies. The agencies shall consult on a finding of eligibility and implement appropriate treatment measures, if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines or a historic property under Section 106 NHPA, if applicable. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the site either: 1) is not a Historical Resource under CEQA or a Historic Property under Section 106; or 2) that the treatment measures have been completed to their satisfaction. • If the find includes human remains, or remains that are potentially human, they shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641). The archaeologist shall notify the Imperial County Medical Examiner (per Section 7050.5 of the Health and Safety Code). The provisions of Section 7050.5 of the California Health and Safety Code, Section 5097.98 of the California PRC, and AB 2641 will be implemented. If the coroner determines the remains are Native American and not the result of a crime scene, the coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the project (Section 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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NAHC can mediate (Section 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (Section 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

Timing/Implementation: As needed during grading and construction.
Enforcement/Monitoring: Imperial Irrigation District.

VI. ENERGY

- a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

Less than Significant Impact. The proposed project is the demolition of the existing Bonanza Building and construction of new equipment, ponds, and a pipeline as part of the ECGS wastewater facility. Energy would be needed during demolition and construction of the project. Energy needs would be limited to diesel fuel and gasoline for trucks and equipment. These materials would not be used in large quantities or in an inefficient or wasteful manner during construction. Once construction is complete, the project would utilize energy as part of its operation. The end goal of the project is to reach compliance with the updated waste discharge requirements of the National Pollution Elimination System (NPDES) permit issued to the facility by the Regional Water Quality Control Board (RWQCB). Thus, energy use associated with construction and operation of the project is not considered wasteful, inefficient, or unnecessary use of energy resources. This impact is considered less than significant.

- b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

No Impact. The proposed project is not located within a Renewable Energy Overlay Zone. The proposed project is the demolition of the existing Bonanza Building and construction of new equipment, ponds, and a pipeline as part of the ECGS wastewater facility. Construction of the proposed project would not conflict with any state or local plan regarding energy efficiency. No impact would occur.

VII. GEOLOGY AND SOILS Would the project:

- a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
- i.) Rupture of a known earthquake fault, as delineated on 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

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Division of Mines and Geology Special Publication 42?

Less than Significant. The project alignment is not located in an Alquist-Priolo Earthquake Fault Zone (DOC 2000). No known faults are identified as aligning through or directly adjacent to the project site. Thus, impacts associated with a known earthquake fault are considered less than significant.

- ii.) Strong Seismic ground shaking?

Less than Significant Impact. The primary seismic hazard at the project site is the potential for strong ground shaking during earthquakes along the Imperial Fault. The proposed project does not include habitable structures that could be damaged in a seismic event. Thus, impacts resulting from strong seismic shaking are considered less than significant.

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

No Impact. The project is located within the boundaries of the existing IID wastewater treatment facility and City of El Centro right-of-way. Liquefaction occurs when granular soil below the water table is subjected to vibratory motions, such as those produced by earthquakes. Given the developed nature of the area with no prior issues, liquefaction is not anticipated to be a threat. All plans and construction documents will be reviewed by IID engineering prior to construction to ensure that soil is properly engineered and capable of the loads associated with the proposed equipment. Therefore, no impact is associated with liquefaction.

- iv.) Landslides?

No Impact. As previously noted, the project is located within the boundaries of the existing IID wastewater treatment facility and City of El Centro right-of-way. The project site and surrounding area are all topographically flat. Therefore, no impact would occur regarding landslides.

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

Less than Significant Impact. The proposed project is located on two soil types: Imperial silty clay, wet; and Imperial-Glenbar silty clay loams, wet, 0 to 2 percent slopes (USDA 1981, p. 15-19). The clay content of these soils results in a slight erosion potential from water and a moderate potential for erosion from wind (USDA 1981, p. 5). As the project would disturb more than one acre, a National Pollutant Discharge Elimination System Permit (NPDES) would be needed during construction. Compliance with the requirements of the NPDES Permit as well as standard Best Management Practices (BMPs) (e.g., watering exposed soils) would ensure that soil erosion is controlled. Therefore, impacts regarding substantial soil erosion or the loss of topsoil would be less than significant.

- 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 landslides, lateral spreading, subsidence, liquefaction or collapse?

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No Impact. The alignment is through a level area and no potential for landslide is present. The soils on which the project is proposed have a high shrink-swell potential due to clay content (USDA 1981, p. 15-19), but no impact is anticipated due to lateral spreading, subsidence, liquefaction, or collapse.

- d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less than Significant Impact. The proposed project is located on two soil types: Imperial silty clay, wet; and Imperial-Glenbar silty clay loams, wet, 0 to 2 percent slopes. The clay content of these soils results in a high shrink-swell potential which can cause damage to roads unless special designs are used. The project does not include any habitable structures and the foundations for the equipment that will be installed will be designed and engineered taking into consideration the soils present. Therefore, direct, and indirect risk to life and property are considered less than significant.

- e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The proposed project does not propose new septic tanks or an alternative wastewater disposal system. The facility would continue to operate using the existing septic system. No impact would occur.

- f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No Impact. According to the Archaeological Resources Inventory and Evaluation Report (ECORP 2023) a moderate potential for buried pre-contact archaeological sites exists within the Project Area due to the presence of alluvium and pre-contact archaeological sites located along Lake Cahuilla shorelines (ECORP 2023b, p. 25). However, areas impacted by the project have all been previously disturbed excavation to install the proposed pipeline would be limited to 3-feet in depth. No other aspect of the project would require any deep excavation which could expose any previously unknown paleontological resources. All areas impacted by construction would have been previously disturbed in association with the existing IID wastewater facility and City of El Centro right-of-way. These areas are flat with no distinguishing geologic features. Thus, no unique geologic features are present and the potential to disturb unknown paleontological resources is low based on the depth of excavation and degree of prior disturbance. No impact would occur.

VIII. GREENHOUSE GAS EMISSIONS *Would the project:*

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than Significant Impact. The proposed project would disturb 37.5 acres and take between 180 and 230 days to complete. Greenhouse gases (GHG) would be generated by heavy equipment used during construction. Based on the limited duration and small numbers of construction equipment (which may include a large heavy equipment excavators, earth movers, and dump trucks), the project is not anticipated to generate substantial greenhouse gases. Therefore, generation of greenhouse gas emissions would be considered a less than significant impact.

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- b) Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less than Significant Impact. The Imperial County Air Pollution Control District (ICAPCD) does not have any specific plans, policies, or regulations adopted for reducing GHG emissions. Therefore, impacts regarding an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of GHGs are considered less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS Would the project:

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

No Impact. The project would not use or store any appreciable quantities of hazardous chemicals during construction. Diesel fuel, oil and hydraulic fluid would be present in association with heavy equipment used and staged on-site. However, the limited quantities and duration of construction would result in a less than significant impact regarding the creation of a hazard to the public through the routine transport, use, or disposal of hazardous materials. No impact is identified regarding routine transport, use and disposal of hazardous materials.

- 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?

No Impact. A search of the Department of Toxic Substances (DTSC) EnviroStor database identified two (2) risk sites within 1 mile of the project site.

- Hank’s Radiator Shop is located at 150 S. Dogwood Road, approximately 1.6 miles south of the project site.
- SCG El Centro Towne is located at 970, 4th Street approximately 1.9 mile west of the project site.

According to the Phase I Environmental Assessment for the site prepared by GS Lyon (included as Attachment C to this document), because of the distance to these risk sites, the environmental risk to the subject property is very low (GS Lyon 2023, p. 12).

Potential for release of hazardous materials into the environment is low in relation to construction (e.g., accidental spill of diesel, oil, or hydraulic fluid). Hazardous materials regulated by the Department of Transportation (DOT) include Sulfuric Acid and Sodium Hypochlorite (i.e., bleach). Currently, the ECGS uses these chemicals in other plant processes. Examples of other potential hazardous chemicals include a non-ox biocide. All chemicals would be used during operation of the new treatment system and would be handled and used in a controlled environment. Given the protocols required for the transport, handling and storage of these materials, potential for upset and accidental release of hazardous materials is considered less than significant.

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

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No Impact. The project site is not located within one-quarter mile of an existing school. Construction and operation of the proposed project would not emit any hazardous emissions or handle hazardous or acutely hazardous materials. No impact would occur.

- d) Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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No Impact. A search of the Department of Toxic Substances Control’s EnviroStor website conducted as part of the Phase I Environment Site Assessment (GS Lyon 2023) did not identify any hazardous materials sites within the boundaries of the project site. No impact is identified for this issue area.

- 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 result in a safety hazard or excessive noise for people residing or working in the project area?
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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No Impact. The northwestern corner of the proposed project is approximately two miles southeast of Imperial Valley Airport. The site outside of the airport land use compatibility safety zones. Therefore, the proposed project would not result in a safety hazard or excessive noise exposure. Thus, no impact is identified for these issue areas.

- f) 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"/> |
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No Impact. The proposed project is not expected to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The project would temporarily disrupt traffic along Villa Avenue during pipeline construction. However, this disruption would be temporary, and Dogwood Road would remain unobstructed. Thus, the proposed project would not impair the implementation of, or physically interfere with, any adopted emergency response plan or emergency evacuation plans. No impact would occur.

- g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?
- | | | | |
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| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Less than Significant Impact. Fire protection and emergency medical services in the area are provided by the of the Imperial Fire Department. According to a map prepared by the California Department of Forestry and Fire Protection (CalFire 2022), the proposed project is in a Local Responsibility Area (LRA), The proposed project site is not identified as a Fire Hazard Severity Zone. The areas surrounding the project site include rural and agricultural areas but no wildland areas. Therefore, the potential to expose people or structures to significant risk of loss, injury of death involving wildland fires is considered less than significant.

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X. HYDROLOGY AND WATER QUALITY *Would the project:*

- a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

No Impact. The goal of the proposed project is to reach compliance with the updated waste discharge requirements of the National Pollution Elimination System (NPDES) permit issued to the facility by the Regional Water Quality Control Board (RWQCB). During construction, Best Management practices including measures such as silt fencing, fiber rolls, street sweeping, etc. will be employed to avoid impacts to water quality. With implementation of the project and BMPs, the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. No impact would occur.

- b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

No Impact. The groundwater in the vicinity of the project site is brackish and was encountered at a depth of 8 to 12 feet below the ground surface. Depth to groundwater may fluctuate due to localized geologic conditions, precipitation, irrigation, drainage, and construction practices in the region (GS Lyon 2023, p. 6). The three 3-acre, double lined evaporation ponds included as part of the project would not allow for groundwater recharge but would not decrease or substantial interfere with groundwater recharge as the area surrounding the project site is largely impervious agricultural lands. The project itself would have minimal water demand as part of the treatment process. Therefore, the project is anticipated to have a less than significant impact on groundwater supplies.

- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces in a manner which would:

- i) Result in a substantial erosion or siltation on- or off-site.

No Impact. The proposed project site and pipeline alignment are currently in a developed area with impervious surface. Potential for erosion would be limited to exposed soils during construction. This would be minimal and Best Management Practices would be employed including watering of exposed soil. No streams or rivers are adjacent to the project site that could be subject to siltation. No impact would occur regarding substantial erosion or siltation.

- ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

Less than Significant Impact. The proposed project is not anticipated to increase the amount of impervious surfaces as the site is currently developed with the wastewater treatment facility. The

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project would add equipment as well as three 3-acre, double lined evaporation ponds. As a result, the project would have a less than significant impact regarding increasing the rate or amount of surface runoff in a manager which would result in flooding on- or off-site.

- iii) Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

No Impact. The proposed project would not generate substantial amounts of runoff as described in item ii), above. The proposed project is located within the boundaries of the existing wastewater treatment facility and City of El Centro right-of-way. The project includes on-site evaporation ponds to capture discharge water from project operations thereby avoiding additional sources of polluted runoff. Storm runoff volumes will not substantially increase or be altered. Thus, the proposed project will not substantially alter the existing drainage pattern of the site, substantially increase the rate of runoff, or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. Therefore, no impact would occur.

- iv) Impede or redirect flows?

No Impact. As previously noted, the proposed project is within the boundaries of the existing wastewater facility and City of El Centro right-of-way. The project includes the addition of three on-site three-acre ponds for wastewater discharge. The project is not anticipated to impede or redirect surface runoff flows. No impact would occur.

- d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. The proposed project site is approximately 22 miles southeast from the southern tip of the Salton Sea which is the nearest large water body. Due to the distance, the Salton Sea does not pose a significant danger of inundation from tsunami or seiche related to the project site. Thus, no impact is identified for these issues.

- e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. As discussed in items a and b above, the proposed project would implement measures during construction to protect water quality. Once operational, the proposed project would not result in the use of groundwater or inhibit the recharge of groundwater. Therefore, the proposed project would have no impact on implementation of a water quality control plan or sustainable groundwater management plan.

XI. LAND USE AND PLANNING *Would the project:*

- a) Physically divide an established community?

No Impact. The project is located within the existing boundaries of the IID ECGS Wastewater Treatment facility which is within Imperial County. The site is just north of the boundaries of the City of El Centro. Thus, no impact is identified regarding dividing an established community.

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- b) Conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less than Significant Impact. The proposed project would result in the addition of new equipment and ponds to the existing ECGS Wastewater treatment facility. The project is consistent with the existing land use and zoning designation of the site. Therefore, conflicts with an applicable land use plan are considered less than significant.

XII. MINERAL RESOURCES *Would the project:*

- a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact. The project site has been used for the wastewater treatment facility for years. According to Figure 8 of the Conservation and Open Space Element of the County of Imperial General Plan (County of Imperial 2008), no known mineral resources occur within the project area. Thus, no impact is identified with regard to 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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact. Refer to item a), above.

XIII. NOISE *Would the project result in:*

- a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project 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 checked="" type="checkbox"/>	<input type="checkbox"/>
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Less than Significant Impact. Construction of the proposed project would result in short-term, temporary noise for approximately 180 to 230 days with the majority of noise occurring during the early stages of demolition and site preparation. Construction activities would create temporary localized increases in noise levels from operation of on-site equipment as well as from delivery trucks hauling materials. The major construction activities for the proposed project would consist of trenching, excavation, Class Road base lay-in, compaction, and equipment installation. Construction noise impacts are the function of several factors including noise generated by equipment; location of the equipment relative to sensitivity of nearby land uses; and the time of day in which the construction activity takes place.

Short-term construction noise generated by equipment would occur with varying intensities and durations. Noise levels from construction operations decrease at a rate of approximately 6 dBA per doubling of distance from the source. Construction would be one-half mile or more from residences to the west along 3rd Street.

Section 90702.00 of the Noise Ordinance sets a residential sound level limit of 50 dBA Leq for daytime hours from 7 a.m. to 10 p.m. and 45 dBA Leq during the noise sensitive nighttime hours from 10 p.m. to 7 a.m. Project construction would occur within the hours specified and are not

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anticipated to result in nuisance noise levels to residence based on distance from construction (i.e. approximately one-half mile).

Once operational, the proposed project equipment would operate 24-hours per day, 7 days per week. Noise sensitive uses include residences, schools, churches, hospitals, nursing homes, parks, and recreation areas. Homes approximately one-half mile to the west are the closest noise sensitive uses. Noise levels are not anticipated to increase to a level that would be perceptible to these residents. Therefore, impacts resulting from generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project are anticipated to be less than significant.

- b) Generation of excessive groundborne vibration or groundborne noise levels?

No Impact. Construction of the proposed project is not anticipated to generate groundborne vibration or noise levels that would be considered excessive. No activities such as blasting, or pile driving would be necessary during construction. Some jackhammering may be used to break up concrete surfaces. However, based on distance to the nearest sensitive uses (i.e., homes approximately one-half mile to the west, no impact would occur regarding generation of excessive groundborne vibration or groundborne noise levels.

- c) For a project located within the vicinity of a private airstrip or 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 or working in the project area to excessive noise levels?

No Impact. The northwestern corner of the proposed project is approximately two miles southeast of Imperial Valley Airport. The site outside of the airport land use compatibility safety zones. Workers involved in project construction and equipment installation would not be exposed to excessive noise levels from a private airstrip or public use airport. No impact would occur.

XIV. POPULATION AND HOUSING Would the project:

- a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and business) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. The proposed project is the construction and installation of equipment at the existing wastewater facility. The end goal of the project is to reach compliance with the updated waste discharge requirements of the NPDES permit issued to the facility by the RWQCB. The project does not propose the development of new housing, nor does it propose construction or extension of new roads. Therefore, the proposed project would have no impact regarding inducing population growth.

- b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

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No Impact. The proposed project is located entirely within the boundaries of the existing wastewater treatment facility as well as City of El Centro right-of-way. As a result, the proposed project would not displace substantial numbers of existing housing or people requiring construction of replacement housing elsewhere. No impact would occur regarding the need for replacement housing.

XV. PUBLIC SERVICES

- a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

1) Fire protection?

Less than Significant Impact. The proposed project is within the jurisdiction of the Imperial County and would be served by the Imperial County Fire Department for fire protection and prevention services. The project is not anticipated to result in a substantial increase in demand for fire protection as the equipment proposed are made of metal and no flammable materials are used in the treatment process. Therefore, impacts to fire protection are considered less than significant.

2) Police Protection?

No Impact. The project site is within the jurisdiction of the Imperial County Sheriff’s Department. The existing wastewater treatment plan includes over-head lighting for safety. Calls for service are not anticipated to increase substantially because of the addition of the new equipment. No impact is identified.

3) Schools?

No Impact. The proposed project is not anticipated to impact schools because it neither includes a residential component nor would it generate the need for new housing to accommodate workforce population. Therefore, no impact is identified for this issue area.

4) Parks?

No Impact. The proposed project is not anticipated to impact parks because it neither includes a residential component nor would it generate the need for new housing to accommodate workforce population. Therefore, no impact is identified for this issue area.

5) Other Public Facilities?

No Impact. The project would enable the wastewater treatment plant to reach compliance with the updated waste discharge requirements of the NPDES permit issued to the facility by the RWQCB. As such, the proposed project would not have an adverse physical effect on the environment resulting from construction of a new school, park, or other public facility.

XVI. RECREATION

- a) Would the project increase the use of the existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

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No Impact. The proposed project is the construction and installation of equipment at the existing wastewater facility. The project would not create a demand for neighborhood or regional parks in the County. Thus, no impact is identified for these issues.

- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment?

No Impact. The proposed project is the construction and installation of equipment at the existing wastewater facility and does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, no impact to the environment because of construction and expansion of recreational facilities would occur in association with the proposed project.

XVII. TRANSPORTATION Would the project:

- a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

No Impact. Demolition and construction is anticipated to occur Monday through Friday from 7:00 a.m. to 8:00 p.m. Because the daily work shift starts at 8:00 a.m. and is anticipated to end at 5:00 p.m. during weekdays, trips generated by construction workers would occur during the AM and PM peak hour. Approximately 37.5 acres would be disturbed to accommodate project construction (including demolition). Overall construction is estimated to take between 180 and 230 days with short-term, temporary increases in construction worker trips and material deliveries. Once completed, the project would generate 1 to 4 trips per day in association with daily operations. Given the temporary increase in traffic and minimal long-term operational traffic, the proposed project would have no adverse impact on a program, plan or ordinance addressing the circulation system.

- b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

Less than Significant Impact. CEQA Guidelines Section 15064.3, subdivision (b), focuses on Vehicle Miles Traveled (VMT) as the criteria for determining the significance of transportation impacts. The proposed project is project is the demolition of the existing Bonanza Building and surrounding structures located at the northwest corner of Dogwood Road and Villa Avenue and construction of a motor control center (MCC) power supply, pumping skids, control equipment, pipeline infrastructure, lime, and soda ash silos, two softening reactor tanks, an ultrafiltration system, and an RO system. Demolition and construction would generate temporary construction-related traffic. This project would be categorized under Section 15064.3, subdivision (b), qualitative analysis. Subdivision (b)(3) acknowledges that lead agencies may not be able to quantitatively estimate VMT for every project type. In these cases, Subdivision (b)(3) encourages lead agencies to evaluate factors such as the availability of transit, proximity to other destinations, and other factors that may affect the amount of driving required by the project.

Construction of the proposed project would result in a temporary increase in local traffic in association with demolition and construction-related workforce traffic and material deliveries. Once the project is completed, construction-related traffic would cease, and employee traffic associated with operation of the facility would resume (no new employees would be needed to operate the

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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facility). Therefore, the proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Impacts to VMT are considered less than significant.

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

No Impact. The proposed project is within the boundaries of the existing wastewater treatment facility and City of El Centro right-of-way. No change in access to the existing facility such as sharp curves or intersections are proposed. No impact would occur regarding a substantial increase in hazards due to a geometric design feature.

- d) Result in inadequate emergency access?

No Impact. The proposed project would result in temporary increases in demolition and construction traffic along Villa Avenue and Dogwood Road. The project would not present any emergency access issues to surrounding residential and agricultural uses. No impact would occur regarding emergency access

XVIII. TRIBAL CULTURAL RESOURCE

- a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place or object with cultural value to a California Native American tribe, and that is:

No Impact. The proposed project is the demolition of the existing Bonanza Building and surrounding structures located at the northwest corner of Dogwood Road and Villa Avenue and construction of an MCC power supply, pumping skids, control equipment, pipeline infrastructure, lime, and soda ash silos, two softening reactor tanks, an ultrafiltration system, and an RO system. The project is located within the boundaries of the existing wastewater treatment facility and City of El Centro right-of-way. All of these areas have been previously disturbed in association with construction of the existing wastewater treatment facility and Villa Avenue.

Tribal Consultation was performed as required under AB 52. Three tribes responded to the invitation to consult in writing. The Cahuilla Band of Indians requested a meeting which was subsequently cancelled. Standard protocols will be implemented during construction, including a Worker Environmental Awareness Program which trains construction workers to halt work if they identify any resources during excavation and other earthmoving activities. No new areas would be disturbed or developed in association with the proposed project. Further, the proposed alignment is not in a culturally sensitive area as shown on Figure 6 “Imperial County Known Areas of Native American Cultural Sensitivity” of the Conservation and Open Space Element (Imperial County 2016). Therefore, no impact would occur regarding a tribal cultural resource.

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| i.) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as define in Public Resources Code Section 5020.1(k), or | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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No Impact. The Bonanza Building and surrounding structures to be demolished are not considered eligible for listing in the California Register of Historical Resources. No impact would occur.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| ii.) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth is subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

No Impact. Refer to item “a”, above.

XIX. UTILITIES AND SERVICE SYSTEMS Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Less than Significant Impact. The proposed project is the demolition of the existing Bonanza Building and surrounding structures located at the northwest corner of Dogwood Road and Villa Avenue and construction of an MCC power supply, pumping skids, control equipment, pipeline infrastructure, lime, and soda ash silos, two softening reactor tanks, an ultrafiltration system, and an RO system and construction of three 3-acre ponds at the existing wastewater treatment facility. The environmental effects of these activities are analyzed in this document. No other new or expanded water or storm water drainage, electric power, natural gas, or telecommunications facilities are proposed. The proposed project would not create the need for additional electrical facilities. All impacts can be reduced to less than significant levels with mitigation incorporated.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Less than Significant Impact. The proposed project would require water during construction to control dust. According to IID, the project is anticipated to require a minimum of one 4,000-gallon water truck operating continuously during earthwork. Assuming 100,000 gallons of water are used per day for dust control during construction, an estimated 18-20 acre-feet of water will be required.

Once operational, the project will require less water usage. Therefore, impacts to water supply will be minimal.

- c) Result in a determination by the waste water treatment provider, which 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?

No Impact. The proposed project would not produce or increase the amount of wastewater requiring treatment. Instead, the project would enable the plant to reach compliance with the updated waste discharge requirements of the NPDES permit issued to the facility by the RWQCB. Portable toilets would be used for workers during construction. No impact would occur regarding wastewater treatment.

- d) Generate solid waste more than state or local standards, or more than the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

No Impact. The proposed project would generate demolition waste as well as construction waste. This would be temporary and would be hauled and disposed of at local landfill licensed to accept demolition and construction waste. Once construction is complete, the project is anticipated to produce minimal waste by the employees operating the facility. No impact to solid waste would occur.

- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. Refer to item d) above.

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project

- a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. As identified in the Seismic and Public Safety Element of the County of Imperial General Plan (County of Imperial, n.d.), the "Imperial County Emergency Plan" addressed the County's planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and nuclear defense operations. The proposed project will be required to maintain emergency access points and allow safe vehicular travel along Villa Avenue and Dogwood Road during the construction period. Thus, the proposed project would not impair the implementation of, or physically interfere with, any adopted emergency response plans or emergency evacuation plans. No impact is identified for this issue area.

- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. Potential for uncontrolled wildfire is unlikely given topography and existing surrounding uses including irrigation canals. The project does not include habitable structures. Therefore, no impact would occur regarding exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The proposed project would demolish the existing Bonanza Building and install new equipment including evaporation ponds and a pipeline within the boundaries of the existing wastewater treatment facility and City of El Centro right-of-way. Because the project is within the boundaries of the existing facility and existing paved right-of-way on Villa Avenue, construction activities associated with the proposed project would be unlikely to exacerbate wildfire risks. Due to the location of the project, new roads, fuel breaks, emergency water sources, power lines, or other utilities would not be required. Therefore, no impact is identified.

- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The proposed project is located on flat land in an unincorporated portion of Imperial County north of the City of El Centro. No impact would occur that would result in exposing people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino,(1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.

Revised 2009- CEQA, Revised 2011- ICPDS, Revised 2016 – ICPDS, Revised 2017 - ICPDS

SECTION 3

III. MANDATORY FINDINGS OF SIGNIFICANCE

The following are Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

- 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?
-

Potentially Significant Unless Mitigation Incorporated. The proposed project would demolish the existing Bonanza Building and install new equipment including evaporation ponds and a pipeline within the boundaries of the wastewater treatment facility and City of El Centro right-of-way. The area impacted by the demolition and new equipment is entirely within an area which has been completely disturbed by the wastewater treatment facility and County roadway. Thus, the proposed project would have no impact with regard to degrading the quality of the environment, substantially reducing 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. Mitigation measures BIO-1 through BIO-3 have been provided to address potential for bats, Burrowing Owl and nesting birds. CUL-1 and CUL-2 have been provided to reduce potential impacts to four historic-period built environment items that were observed and noted within the Project Area (an evaporation pond, two large containment tanks, and a lined irrigation lateral). These mitigation measures were provided because items these have not been evaluated as of yet. Therefore, impacts to the four historic-period built items are considered potentially significant unless mitigation is incorporated.

- 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.)
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No Impact. Due to the short-term and temporary nature of demolition and construction and minimal change in emissions during operation, no significant individual or cumulative impacts to air quality or greenhouse gas emissions are anticipated. No other individual projects would result in a cumulative impact with regard to any other resource areas discussed in this document. In conclusion, the proposed project would have no individually or cumulatively considerable impacts.

- c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?
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Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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No Impact. As described in items a and b, the proposed project is in an area that has been previously disturbed. Demotion and construction impacts are short term and would not result in any long-term increases in air emissions which could be harmful to human beings. Once completed, the project would not substantially increase air emissions or any other hazard to human beings. No other significant impacts have been identified in this analysis which could result in adverse impacts to human beings. Therefore, no impact is identified with regard to the project having a substantial adverse effect on human beings directly or indirectly.

IV. PERSONS AND ORGANIZATIONS CONSULTED

This section identifies those people who prepared or contributed to preparation of this document. This section is prepared in accordance with Section 15129 of the CEQA Guidelines.

A. IMPERIAL IRRIGATION DISTRICT

Donald Vargas, Compliance Administrator II

Jose Perez, Project Manager, Energy Department

Wayne A. Lane, II, Principal Engineer

John Acuña, Energy - Generation

B. AGENCIES/ORGANIZATIONS

Imperial County Air Pollution Control District

C. ENGINEER AND TECHNICAL STUDIES

Stantec – Civil Engineering

ECORP Consulting, Inc. – Biological and Archaeological Studies

GS Lyons – Phase I Environmental Site Assessment

(Written or oral comments received on the checklist prior to circulation)

V. REFERENCES

- California Department of Conservation. Division of Land Resource Protection, Farmland Mapping and Monitoring Program. 2017. "Imperial County Important Farmland 2016". Published June 2017. Referenced in Text as (DOC 2017).
- California Department of Forestry and Fire Protection, 2007. "Imperial County Draft Fire Hazard Severity Zones in LRA". September 19, 2007. Referenced in text as (CDF 2007).
- California Department of Transportation. 2023. List of Eligible and Officially Designated State Scenic Highways (Excel Spreadsheet). Referenced in text as (Caltrans 2023).
- ECORP Consulting, Inc. June 2023. Biological Technical Report for the El Centro Generating Station Wastewater Mitigation Project. Referenced in text as (ECORP 2023a).
- July 2023. Archaeological Resources Inventory and Evaluation Report for the El Centro Generating Station Wastewater Mitigation Project. Referenced in text as (ECORP 2023b).
- GS Lyon. June 2023. Phase I ESA Report IID ECGS Wastewater Mitigation Program Property NWC Villa Road & Dogwood Road El Centro, California. Referenced in text as (GS Lyon 2023).
- Imperial County Airport Land Use Commission. 1996. Airport Land Use Compatibility Plan. June 1996. Referenced in text as (ALUC 1996).
- Imperial County Airport Land use Compatibility website:
<https://icpds.maps.arcgis.com/apps/Viewer/index.html?appid=2fbf08cc96c34ace843a3773553c93f8> Access March 30, 2020. Referenced in text as (ALUC 2020).