



Imperial County Planning & Development Services Planning / Building

Jim Minnick
DIRECTOR

TO:

Chairman Mike Goodsell
Vice Chairman Jenell Guerrero
Commissioner Dennis Logue
Commissioner Jerry Arguelles
Commissioner Sylvia Chavez

FROM:

Jim Minnick, Secretary
Airport Land Use Commission
Director of Planning & Development

SUBJECT:

Public Hearing to Consider the Burrtec Water Well for farming project. The proposed project site is located at the Salton Sea Airport area. within Section 5, Township 11 South, Range 10 East, San Bernardino Base Meridian. Parcel centroid coordinates $115^{\circ}57'31.698''W, 33^{\circ}14'29.944''N$
 $115^{\circ}57'7.895''W, 33^{\circ}14'33.968''N, 115^{\circ}57'12.409''W, 33^{\circ}14'30.836''N$ $115^{\circ}56'54.456''W, 33^{\circ}14'20.429''N$ (Supervisory District #4) (ALUC 02-23) [David Black, Planner, 442-265-1736, extension 1746 or by email at davidblack@co.imperial.ca.us].

DATE OF REPORT: May 17, 2023

AGENDA ITEM NO: 1
HEARING DATE: May 17, 2023
HEARING TIME: 6:00 P.M.
HEARING LOCATION: County Administrative Center
Board of Supervisors Chambers
940 Main Street
El Centro, CA 92243

SECRETARY RECOMMENDATION

It is the Staff's recommendation that the proposed Burrtec commercial water well project on private properties near the Salton Sea Airport for Conditional Use Permit # 22-0002, may be considered an acceptable land use as the project appears to be located within an airport compatibility area, and may be found consistent with the 1996 Airport Land Use Compatibility Plan with restrictions.

SECRETARY'S REPORT

Project Location:

The Project would be located on approximately 250 acres within Imperial County, California, surrounding the Airport (Figure 1, Project Site Location). The Project address is 1590 Air Crest Drive, which is located just west of Highway 86 on land owned by Burrtec Waste Industries, Inc. Regional access is from Highway 86, and Project site access is off Highway 86, along Air Park Drive. The Project would be within Section 5, Township 11 South, Range 10 East, San Bernardino Base Meridian, and Assessor Parcel Numbers (APNs) 017-970-009, 017-970-010, 017-970- 011, and 017-970-012.

The Airport area is approximately 300 total acres. However, runway and hanger/office facilities and the associated flight safety zones surrounding the Airport runway, account for approximately 50 acres of the property, leaving 250 acres undeveloped as open desert. The Project area is zoned Open Space/Recreation (S-1).

The General Plan Land Use designation for the entire Project is Recreation/Open Space.

Project Description:

Burrtec Waste Industries, Inc. (Applicant) in coordination with Imperial County (County) proposes the Burrtec Commercial Water Well and Farming Project (Project or Proposed Project). The Project would be located on approximately 250 acres in Imperial County (County) surrounding the Salton Sea Airport. The heavy clay ground surrounding the Airport will require the addition of organics and amendments to support crop production.

The Project would receive organics materials from regional diversion facilities and programs which will include composted green material, composted green/wood and food wastes, manures, dried Class A and Class A (Exceptional Quality (EQ))¹ biosolids (collectively referred to as compost).

These materials are occasionally supplemented with gypsum and other common agronomic additives at the Salton City Composting/Biosolids Drying Operation, which would help to improve soil drainage and crop production and reduce water needs. The purpose of the Project is to support **diversion of organics mandated by the State within Senate Bill (SB) 1383, resulting from regional recycling efforts.**

The proposed Project intends to use the water from the well to support these efforts. The water well would be approximately 600-750 feet deep and would produce up to approximately 200 acre-feet per year (AFY) of water. While no specific crop has been chosen at this time, some sort of feed crop would be grown that would change depending on the market. The Proposed Project's activities would require a Conditional Use Permit (CUP) 22-0002.

General Plan/ALUCP Analysis:

Portions of the project area appears to be within the A & B-1 area zones. Height limits would be restricted near the Salton Sea Airport runway takeoff and landing areas and taxiway areas.

No buildings are being constructed in the project area and the proposed water well, once drilling is finished, will be at ground level. The project site will be clear of any structures except for a small area for the well and piping.

The Airport Land Use Compatibility Plan, Policies / Chapter 2, "Scope of Review", Section 2, Types of Actions Reviewed, Supporting Compatibility Criteria (2) Safety, (5) open land and Airspace Protection (2) (b) within Compatibility Zones A and B, height restrictions of less than 35 feet may be required".

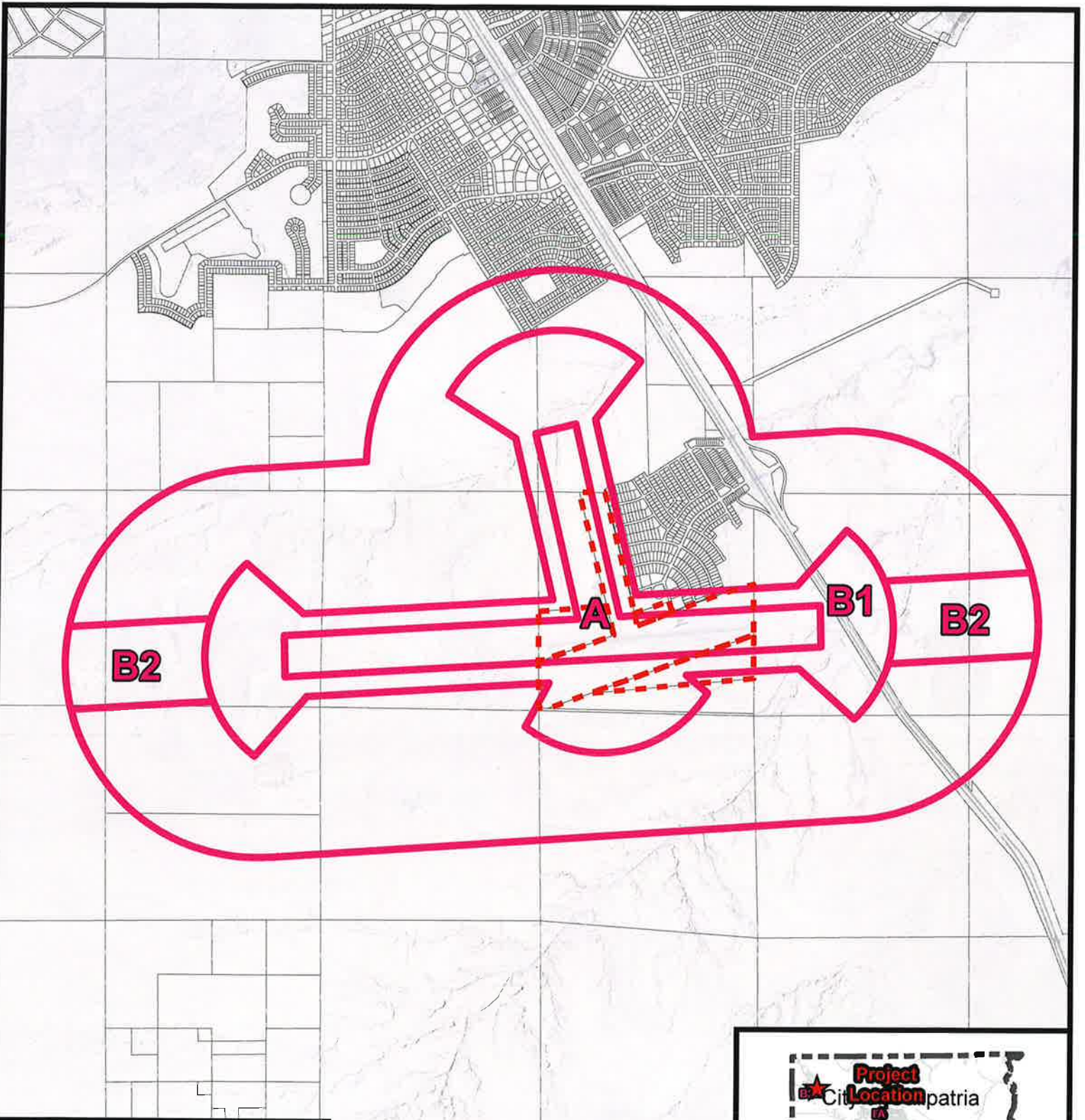
Under Table 2A of the Compatibility Criteria, Pastures and field crops are normal acceptable Uses in the A zone and B-1 zone.



This project request before the Commission show proposed uses to be in compliance with ALUC Plan.

Attachments:

- A- Site Plan
- B- EEC package w/IS
- C- Application
- D- Project Description

Attachment A.
Vicinity Map



 Project Location
 Airport Compatibility Zones



IMPERIAL COUNTY AIRPORT LAND USE COMMISSION
SALTON SEA AIRPORT
AND SURROUNDING LANDS, CA
APN 017-970-009, 010, 011 AND 012-000



Attachment B.
Initial Study for review on impacts

*Initial Study & Environmental Analysis
For:*

Burrtec Commercial Water Well and Farming Project



Prepared By:

COUNTY OF IMPERIAL
Planning & Development Services Department
801 Main Street
El Centro, CA 92243
(442) 265-1736
www.icpds.com

April 2023

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SECTION 1 INTRODUCTION

A. PURPOSE

This document is a policy-level, project level Initial Study for evaluation of potential environmental impacts resulting from the proposed Burrtec Commercial Water Well and Farming Project .

B. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REQUIREMENTS AND THE IMPERIAL COUNTY'S GUIDELINES FOR IMPLEMENTING CEQA

As defined by Section 15063 of the State California Environmental Quality Act (CEQA) Guidelines and Section 7 of the County's "CEQA Regulations Guidelines for the Implementation of CEQA, as amended", 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) 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 County of Imperial; and the regulations, requirements, and procedures of any other responsible public agency or an agency with jurisdiction by law.

Pursuant to the County of Imperial Guidelines for Implementing CEQA, depending on the project scope, the County of Imperial Board of Supervisors, Planning Commission and/or Planning Director 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 any project in the County.

C. INTENDED USES OF INITIAL STUDY AND NEGATIVE DECLARATION

- 1) This IS and Notice of Preparation (NOP) are informational documents which are intended to inform County of Imperial 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 IS and NOP prepared for the Project will be circulated for a period of 35 days for public and agency review and comments.

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 applications.

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 County's 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, a 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.

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

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 County'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 is 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 into 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]). This document incorporates by reference appropriate information from the “Final Environmental Impact Report and Environmental Assessment for the “County of Imperial General Plan EIR” prepared by Brian F. Mooney Associates in 1993 and updates.

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]). The General Plan EIR and updates are available, along with this document, at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (442) 265-1736.
- This document must be available for inspection by the public at an office of the lead agency (CEQA Guidelines Section 15150[b]). These documents are available at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (442) 265-1736.
- 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 State Clearinghouse Number for the County of Imperial General Plan EIR is SCH #93011023.
- 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.

II. Environmental Checklist

1. **Project Title:** Burrtec Commercial Water Well and Farming Project
2. **Lead Agency:** Imperial County Planning & Development Services Department
3. **Contact person and phone number:** David Black, Planner, (442) 265-1736, ext. 1746
4. **Address:** 801 Main Street, El Centro CA, 92243
5. **E-mail:** DavidBlack@co.imperial.ca.us
6. **Project location:** The Project site comprises approximately 250 acres within Imperial County (County), California, surrounding the Salton Sea Airport (Airport). The Project address is 1590 Air Crest Drive, which is located just west of Highway 86 on land owned by Burrtec Waste Industries, Inc. The Project would be within Section 5, Township 11 South, Range 10 East, San Bernardino Base Meridian, and Assessor Parcel Numbers (APNs) 017-970-009, 017-970-010, 017-970-011, and 017-970-012.
7. **Project sponsor's name and address:** Burrtec Waste Industries, Inc.
9400 Cherry Avenue, Building C, Fontana, CA 92335
8. **General Plan designation:** Recreation/Open Space
9. **Zoning:** S-1
10. **Description of project:** Burrtec Waste Industries, Inc. (Applicant) is proposing the Burrtec Commercial Water Well and Farming Project (Project or Proposed Project). The Project would be located on approximately 250 acres in Imperial County (County) surrounding the Salton Sea Airport. The heavy clay ground surrounding the Airport will require the addition of organics and amendments to support crop production. The Project would receive organics materials from regional diversion facilities and programs which will include composted green material, composted green/wood and food wastes, manures, dried Class A and Class A (Exceptional Quality (EQ)) biosolids (collectively referred to as compost). These materials are occasionally supplemented with gypsum and other common agronomic additives at the Salton City Composting/Biosolids Drying Operation, which would help to improve soil drainage and crop production and reduce water needs. The purpose of the Project is to support diversion of organics mandated by the State within Senate Bill (SB) 1383, resulting from regional recycling efforts. The proposed Project intends to use the water from the well to support these efforts. The water well would be approximately 600-750 feet deep and would produce up to approximately 200 acre-feet per year (AFY) of water. While no specific crop has been chosen at this time, some sort of feed crop would be grown that would change depending on the market. The Proposed Project's activities would require a Conditional Use Permit (CUP) 22-0002.
11. **Surrounding land uses and setting:** Surrounding the runway and Project site is mostly vacant, desert land. The Imperial County Sanitary Landfill is located just over two miles west of the Project site, and an approved subdivision is located directly northeast of the Project site, however, only six single family homes are currently developed in the subdivision and no recent construction has occurred. Recreation and open space land uses surround the Project site. Bureau of Land Management (BLM) owned land is located directly south and west of the Project site, and State owned land is located southwest of the Project site. Directly north of the site is zoned Low Density Residential Lot Size Minimum 0.5 Acres (R-1-L-.5), and the subdivision area has a mixture of Light Industrial (M-1), (Medium Commercial) C-2, Low Density Residential (R-1), Medium Density Residential (R-2), and Medium to High Density Residential (R-3) zoning.
12. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):** California Department of Fish and Wildlife (CDFW), State Water Resources Control Board (SWRCB), Regional Water Quality Control Board (RWQCB), California Integrated Waste Management Board (CIWMB), California Department of Industrial Relations, Division of Occupational Safety and Health (Cal/OSHA), Imperial County Air Pollution Control District (ICAPCD), Airport Land Use Commission (ALUC).
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? In**

accordance with California Assembly Bill (AB) 52, Native American tribes with potential resources in the area were notified of the Project on January 18, 2023 and offered the opportunity for consultation. As of April 25, 2023, the Quechan Tribe has requested consultation.

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.

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 and 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 Emissions | <input type="checkbox"/> Hazards & 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 checked="" type="checkbox"/> Mandatory Findings of Significance |

ENVIRONMENTAL EVALUATION COMMITTEE (EEC) DETERMINATION

After Review of the Initial Study, the Environmental Evaluation Committee has:

- Found that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- Found that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- Found that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- Found 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.
- Found that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) 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

<u>EEC VOTES</u>	<u>YES</u>	<u>NO</u>	<u>ABSENT</u>
PUBLIC WORKS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ENVIRONMENTAL HEALTH SVCS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
OFFICE EMERGENCY SERVICES	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
APCD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
AG	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SHERIFF DEPARTMENT	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ICPDS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Jim Minnick, Director of Planning/EEC Chairman

Date:

PROJECT SUMMARY

Burrtec Waste Industries, Inc. (Applicant) in coordination with Imperial County (County) proposes the Burrtec Commercial Water Well and Farming Project (Project or Proposed Project). The Project would be located on approximately 250 acres in Imperial County (County) surrounding the Salton Sea Airport. The heavy clay ground surrounding the Airport will require the addition of organics and amendments to support crop production. The Project would receive organics materials from regional diversion facilities and programs which will include composted green material, composted green/wood and food wastes, manures, dried Class A and Class A (Exceptional Quality (EQ))¹ biosolids (collectively referred to as compost). These materials are occasionally supplemented with gypsum and other common agronomic additives at the Salton City Composting/Biosolids Drying Operation, which would help to improve soil drainage and crop production and reduce water needs. The purpose of the Project is to support diversion of organics mandated by the State within Senate Bill (SB) 1383, resulting from regional recycling efforts. The proposed Project intends to use the water from the well to support these efforts. The water well would be approximately 600-750 feet deep and would produce up to approximately 200 acre-feet per year (AFY) of water. While no specific crop has been chosen at this time, some sort of feed crop would be grown that would change depending on the market. The Proposed Project's activities would require a Conditional Use Permit (CUP) 22-0002.

The County has prepared this Initial Study (IS) to provide the public and responsible agencies with information about the potential environmental impacts associated with implementation of the proposed Project. This IS includes a project-level analysis of the potential effects associated with the Project.

A. PROJECT LOCATION

The Project would be located on approximately 250 acres within Imperial County, California, surrounding the Airport (Figure 1, Project Site Location). The Project address is 1590 Air Crest Drive, which is located just west of Highway 86 on land owned by Burrtec Waste Industries, Inc. Regional access is provided by Highway 86, and Project site access is provided off of Highway 86, along Air Park Drive. The Project would be within Section 5, Township 11 South, Range 10 East, San Bernardino Base Meridian, and Assessor Parcel Numbers (APNs) 017-970-009, 017-970-010, 017-970-011, and 017-970-012.

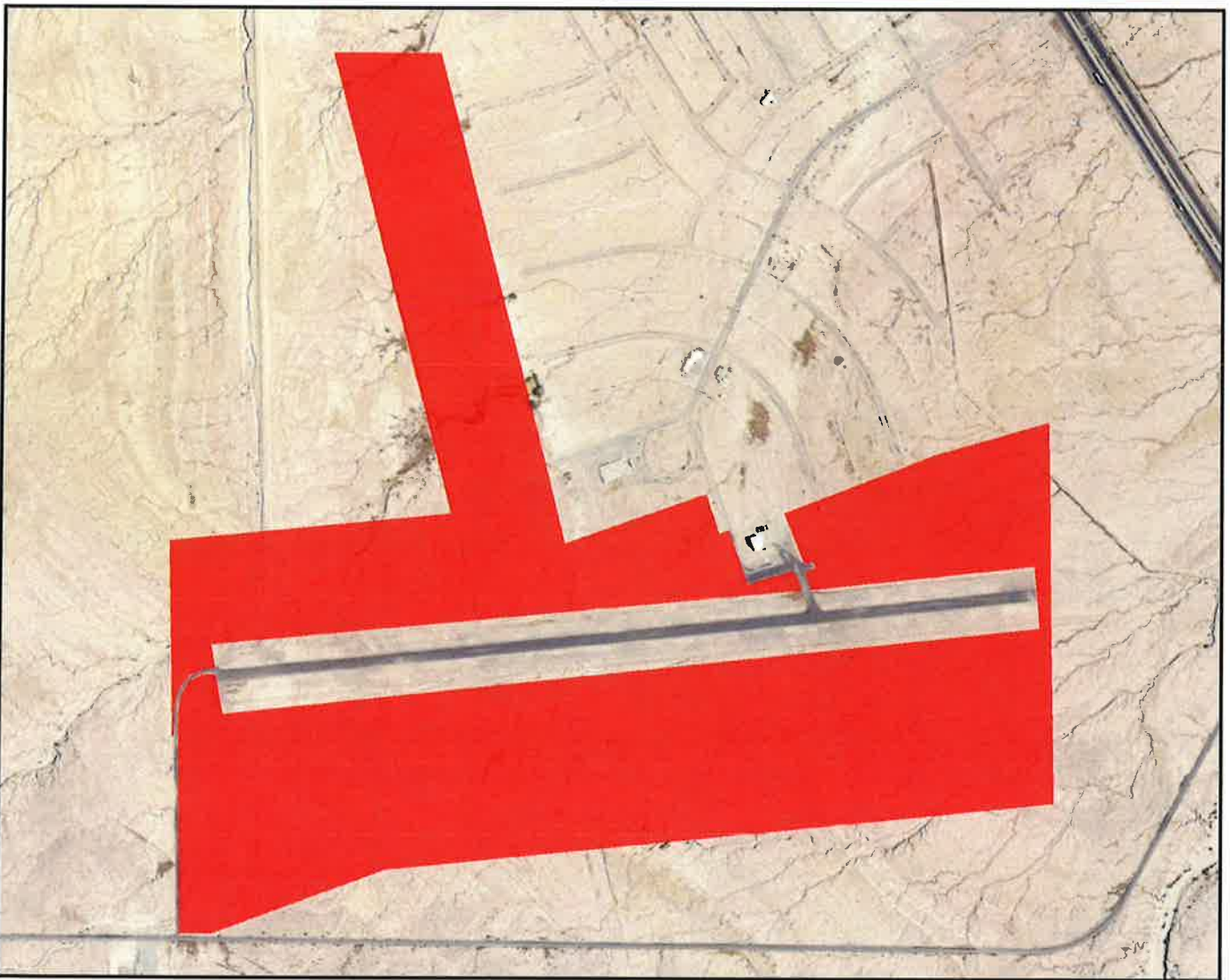
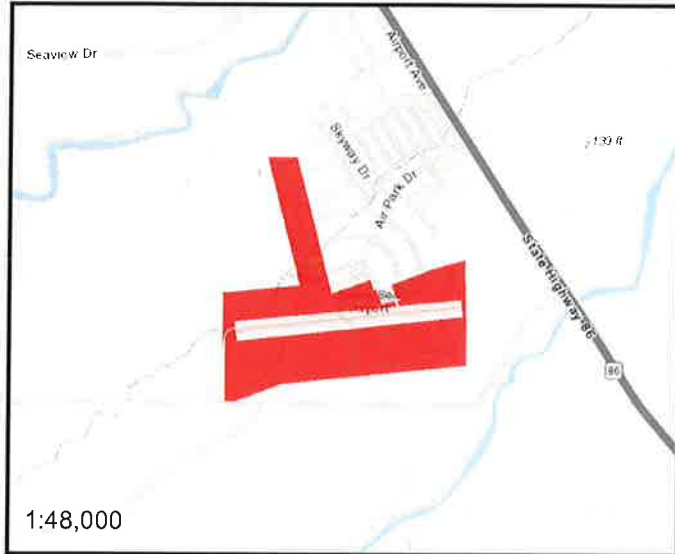
The Airport area is approximately 300 total acres. However, runway and hanger/office facilities and the associated flight safety zones surrounding the Airport runway, account for approximately 50 acres of the property, leaving 250 acres undeveloped as open desert.

The Project area is zoned Open Space/Recreation (S-1) (Figure 2, Zoning Map). The General Plan Land Use designation for the entire Project is Recreation/Open Space (Figure 3, Land Use Designation Map).

C. CURRENT USE OF THE PROJECT SITE AND SURROUNDING AREAS

The Project site is located at the Airport and consists of 250 acres of the total 300 acres of the Airport property. The Airport, which was first constructed in the late 1950's, was constructed with a lighted main east/west runway 75 feet wide by 4,800 feet long. The runway lighting system was dismantled and is no longer operational. Also existing on site is a 3,000 square foot hanger, and a 1,250 square foot office with restroom facilities. Additionally, an existing parking lot is located on the site and contains parking for up to 15 vehicles. Air traffic in and out of the Airport is limited to periodic use by privately owned light aircraft and occasional rotary wing military aircraft from the regional

¹ Class A biosolids are essentially free of pathogens prior to land application. The metal contents requirements under the Part 503 Rule are the same for Class A and Class B biosolids. Class A biosolids products include lime pasteurized biosolids and fertilizer pellets. EQ biosolids have lower metals concentration requirements than either Class A or Class B biosolids and have the same pathogen levels as Class A biosolids. (Cal Recycle 2022)



 Project Boundary (250 ac)

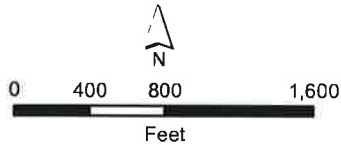


Figure 1
Burrtec Commercial Water Well
and Farming Project
Project Location and Vicinity

Figure 2

Burrtec Commercial Water Well and Farming Project Zoning

Project Location

Well Location

Zoning

C-2 (Medium Industrial)

M-1 (Light Industrial)

R-1 (Low Density Residential)

R-1-L-5 (Low Density Residential)

R-2 (Medium Density Residential)

R-3 (Medium to High Density Residential)

S-1 (Open Space/Recreation)

S-2 (Open Space/Preservation)

BLM (Bureau of Land Management)

STATE (State Parks)

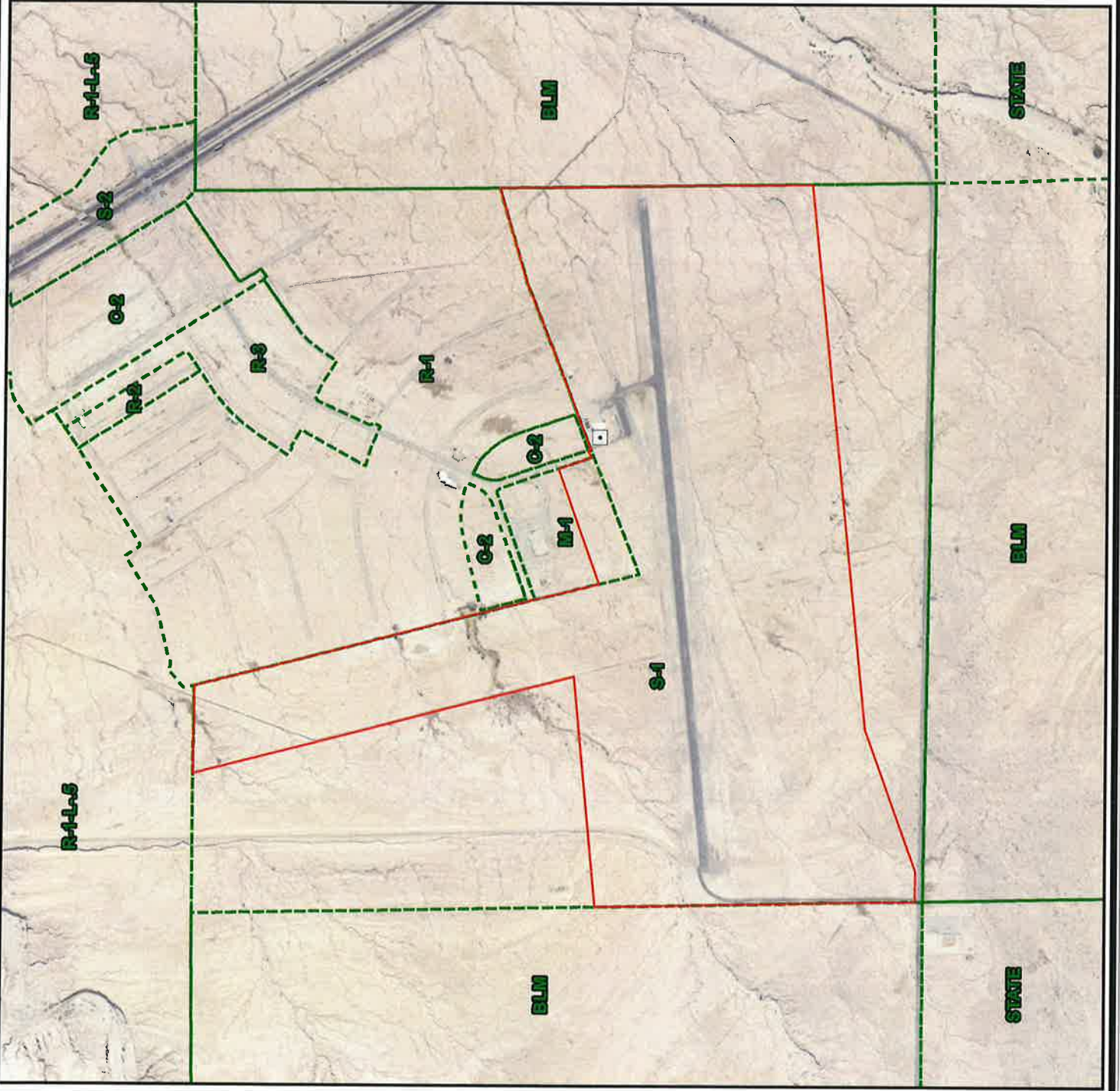
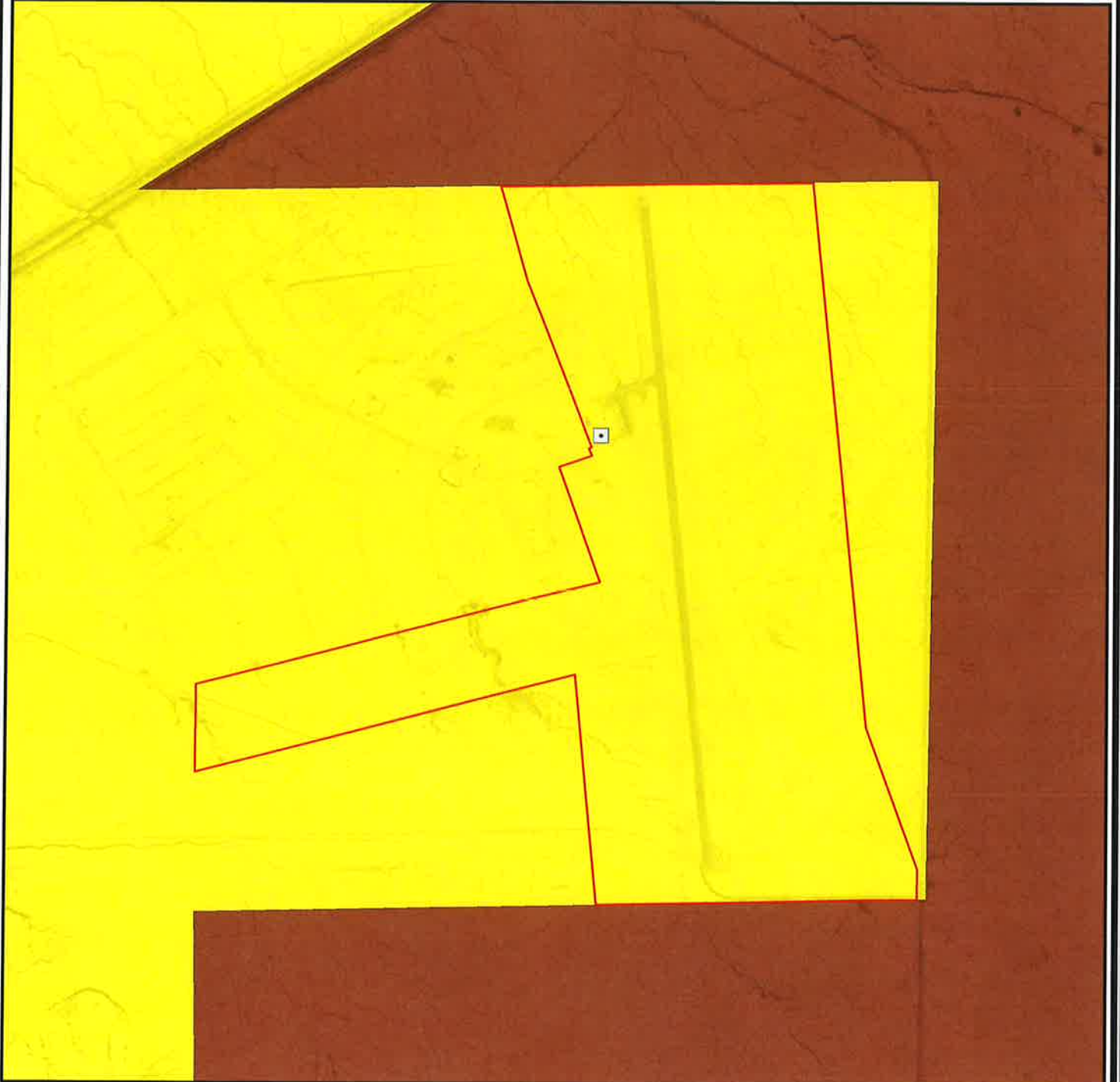


Figure 3
 Burrtec Commercial Water Well
 and Farming Project
 Land Use Designation

- Project Location
- Well Location

- Land Use Designation**
- Recreation/Open Space
 - Urban



training facilities that request use of the airport for practice maneuvers. The entire Airport area has a security fence around the existing runway and facilities. The Applicant owns and maintains the existing facilities. The land surrounding the runway and Project site is mostly vacant, desert land. The Imperial County Sanitary Landfill is located just over two miles west of the Project site, and an approved subdivision is located directly northeast of the Project site, however, only six single family homes are currently developed in the subdivision and no recent construction has occurred.

Recreation and open space land uses surround the Project site. Bureau of Land Management (BLM) owned land is located directly south and west of the Project site, and State owned land is located southwest of the Project site. Directly north of the site is zoned Low Density Residential Lot Size Minimum 0.5 Acres (R-1-L-.5), and the subdivision area has a mixture of Light Industrial (M-1), (Medium Commercial) C-2, Low Density Residential (R-1), Medium Density Residential (R-2), and Medium to High Density Residential (R-3) zoning.

C. PROJECT SUMMARY

The Proposed Project would include a commercial water well to support farming surrounding the Airport. The soils surrounding the Airport contain heavy clay and will require the addition of organics and amendments to support crop production. The Project would receive organics materials from regional diversion facilities and programs which will include composted green material, composted green/wood and food wastes, manures, dried Class A and (EQ) biosolids (collectively referred to as compost). These materials are occasionally supplemented with gypsum and other common agronomic additives at the Salton City Composting/Biosolids Drying Operation, which would help to improve soil drainage and crop production and reduce water needs. The proposed Project would add organics processing infrastructure to the County to conform to California's waste diversion regulations including SB 1383. Starting in 2022, Cal Recycle started enforcing local jurisdiction responsibilities under SB 1383, including providing organic material collection to residents and businesses. The Project would receive material from the Regional Organics Process and Diversion Operations with majority of materials processed through the Salton City Composting/Biosolids Drying Operation, which is located at the Salton City Landfill with occasional direct delivery from other processing facilities.

The Project's first phase would include converting the heavy clayey soils in fertile ground capable of supporting plant life. Preliminary estimates indicate the soil can be modified at approximately 9 acres per year, which will take up to 27 years to be fully operational on all 250 acres. Once fully operational, the Project would be receiving up to 200 dry tons per day or 73,000 tons per year (TPY) of compost.

The proposed Project intends to use the water from the well to support these efforts. The water well would be located 25 feet west of the Airport hanger and 75 feet south of the security fence line as shown in Figure 1. The water well would be approximately 600-750 feet deep and would produce up to approximately 200 acre-feet per year (AFY) of water. The well would be cased with stainless with a solid wall to 350 feet and then screened to the bottom. The well would include a 75 horsepower (hp) vertical turbine pump.

While no specific crop has been chosen at this time, it is anticipated that the Applicant will utilize a feed crop that may vary depending on the market. To analyze a worst case scenario, alfalfa has been assumed for purposes of this document.. Approximately one harvest per year would generate approximately 2,500 tons of feed. Assuming alfalfa, the feed would be sold to local cattle farmers. Regardless, any future crop would solely utilize water from the well and would not require any additional water beyond the 200 AFY.

The existing office building and parking lot would be utilized for Project operations. A layout of the Proposed Project is shown in Figure 4.

D. PROJECT CONSTRUCTION:

Construction of the commercial water well would begin when all necessary permits are obtained, expected to be 2023. Construction is expected to be complete in approximately one month. All work would occur in one phase, with work occurring during daylight hours over 5 or 6 days per week. Approximately four workers are anticipated at peak periods.

Construction workers will commute to the site and there will be no onsite housing for workers. Well drilling and construction work is expected to be Monday through Saturday 7:00 am to 3:00 pm. Paved parking is available at the airport office and hanger building for at least 15 vehicles.

Development of the farming portion of the Project will occur over a number of years and will depend on the availability of organic soil amendment materials. It is anticipated that work would progress on 2 to 4 acre parcels and would include ripping and disking of the soils as is generally typical of any agricultural operation. Once initial disking is complete, then organics would be spread on the ground then disked and tilled into the soil to a depth of 6 feet +/- to ensure deep root zone penetration with organics. Initial estimates indicate approximately 9 acres per year can be completed at the anticipated organics availability, which will take up to 27 years to be fully operational on all 250 acres.

No import or export of soil would be required. Very minimal water would be required during construction for drilling of the well. Construction employees would utilize the existing office restrooms and bottled water and / or the airport hanger facility which is serviced by Coachella Valley Water District domestic water supply. The Project will be constructed so that no off-site discharge of water will be allowed, and all of the runoff or discharge will be managed on-site.

Below is a list of construction equipment anticipated to be required for the Project:

Well Drilling

- Drill Rig
- Air compressors

Farming

- Ag Tractor
- Bulldozer
- Water Truck
- Soil Disc

E. PROJECT OPERATIONS

The farming operations will be staffed as needed Monday through Saturday from 5:00 am to 5:00 pm, however hours may vary depending on the outside temperature. Deliveries of organic material would occur Monday through Saturday from 6:00 am through 3:00 pm. Once fully operational, up to 10 trucks per day would make deliveries from the Salton City Compost/Drying Operation located at the Salton City Landfill. XX. Crops would be harvested once a year and would be trucked out within the County, worst case scenario would assume up to 100 trucks per year. Project operations would require four full-time employees.

Operational Water Use

As previously mentioned, crop production would not require water beyond the 200 AFY of water. While preparing the soil for crop production, water would be applied with a water truck that would be filled directly from the well. Once crops are planted, a water delivery system of pipes, agricultural canals, and/or automated spray system fed by electric pumps would be utilized depending on the final crop selection.

Potable water for employees would be in the form of water bottles and / or the airport hanger facility which is serviced by Coachella Valley Water District domestic water supply. Employees would utilize the existing office restrooms. Wastewater would utilize the existing system, which is connected to the public sewer system owned and operated by the Salton Sea Community Services District.

Hydrology and Water Quality

The Proposed Project would be required to comply with the State Water Resource Control Board, Water Quality Order Number 2004-0012-DWQ General Waste Discharge Requirements for the application of soil amendments to land in

agriculture activities. No off-site runoff would occur.

Utilities

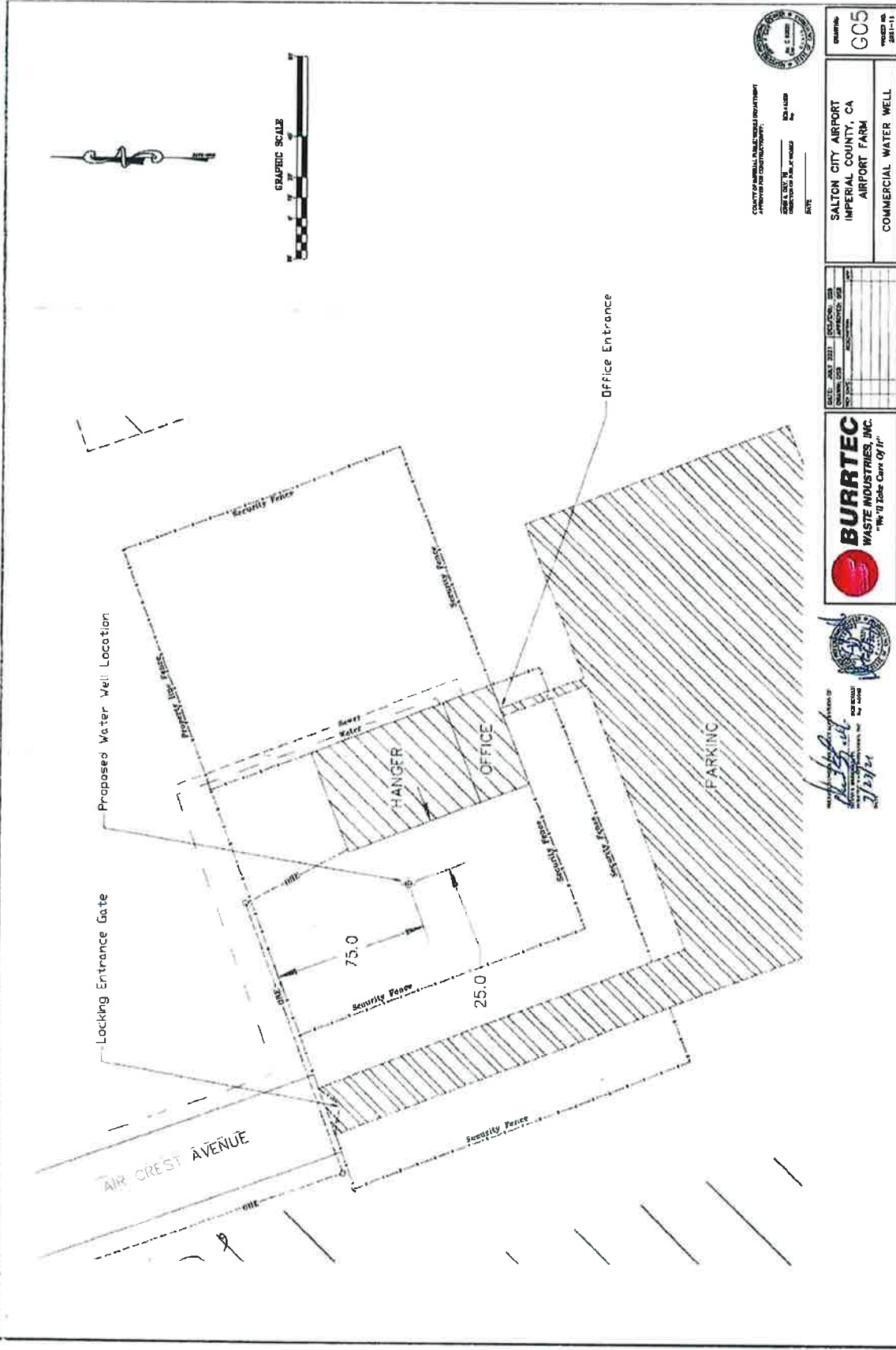
The Project would not require additional electricity beyond that for the well pump, which would be minimal. No natural gas would be required. Any additional increase in solid waste would be generated by employees only. Solid waste pickup within the Salton City community is voluntary and on an as needed basis. When solid waste pick up is needed, the Project would utilize a local waste service contractor.

Fire Protection and Safety

Water for fire protection would be supplied by the public water system owned and maintained by Coachella Valley Water District. Fire protection services would be through Imperial County Fire. The system will be designed in accordance with federal, state, and local fire codes, occupational health and safety regulations and other jurisdictional codes, requirements, and standard practices.

F. PROJECT DECOMMISSIONING AND ABANDONMENT

The projected life of the Project including the commercial water well drilling, soil building/improvement work is approximately XX years. At the end of operations, a Site Abandonment Plan will be prepared and implemented in conformance with the County and CUPA requirements, for consideration by the Planning Commission prior to Project approval. The Plan will describe the proposed equipment dismantling and site restoration program in conformance with the wishes of the respective landowners/lessors and requirements in effect at the time of abandonment and would be implemented at the end of Project operations.



COUNTY OF IMPERIAL, PUBLIC WORKS DEPARTMENT
 APPROVED FOR CONSTRUCTION

DATE: _____ BY: _____
 DATE: _____ BY: _____
 DATE: _____ BY: _____

PROJECT: SALTON CITY AIRPORT
 IMPERIAL COUNTY, CA
 AIRPORT FARM
 COMMERCIAL WATER WELL

PROJECT NO: G05
 SHEET NO: 001-11

DATE: JULY 2021	REVISION: 001
DATE: _____	REVISION: 002
DATE: _____	REVISION: 003
DATE: _____	REVISION: 004
DATE: _____	REVISION: 005



Professional Engineer Seal
 License No. 12345
 State of California
 Date: 7/23/21

Figure 4
 Burrtec Commercial Water Well
 and Farming Project
 Project Site Plan

NOTE:
 Office, gate, and parking are existing.



G. REQUIRED PERMITS AND APPROVALS

Lead Agency Approval

Imperial County Planning Department would be the lead agency for the proposed Project. The following permits would be required from the lead agency:

- Imperial County Planning Department – Conditional Use Permit

Reviewing Agencies

State Agencies

- California Air Resources Control Board (CARB)
- Native American Heritage Commission (NAHC)
- State Water Resources Control Board (SWRCB)
- California Department of Fish and Wildlife (CDFW)

Regional Agencies

- Airport Land Use Commission
- Regional Water Quality Control Board – Water Discharge Requirement
- Imperial County Air Pollution Control District – Permit to Construct and Permit to Operate
- Imperial County Public Works
- Imperial County Fire Department and Office of Emergency Services

H. OBJECTIVES

The purpose of the Project is to support diversion of organics mandated by the State within Senate Bill (SB) 1383, resulting from regional recycling efforts. The objectives of the Project are interrelated and are as follows:

- Assist Imperial County to conform to California's waste diversion regulations, including SB1383.
- Assist the State of California in reducing 75% of organic waste reduction from landfills by 2025 and enforcing implementation of a diversion program starting in 2023.
- Assist the State of California in achieving or exceeding its Renewable Portfolio Standard (RPS), Senate Bill 350, Senate Bill 100, and the California Global Warming Solutions Act (Assembly Bill 32) and greenhouse gas emissions reduction objectives.

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

Except as provided in Public Resources Code Section 21099, would the project:

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

According to the Imperial County Conservation and Open Space Element (2016), Section E, Number 2, no State scenic highways have been designated in Imperial County. In addition, according to Figure 9 of the Imperial County Conservation and Open Space Element the Proposed Project is mapped in an area designated to have a Low Value of Maintenance of Visual Quality. No scenic vistas or scenic highways would be impacted by this project. No impact is projected.

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

The project location does not contain scenic resources such as trees, rock outcroppings, or historic buildings. No State scenic highways have been designated in Imperial County. According to Figure 9 of the Imperial County Conservation and Open Space Element the Proposed Project is mapped in an area designated to have a Low Value of Maintenance of Visual Quality. The project site does not contain scenic resources within a state scenic highway. No impacts to scenic resources are projected.

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

The Proposed Project would temporarily increase the amount of equipment onsite, temporarily changing the view. Upon completion of the Proposed Project, the undeveloped land would be converted to farmland. The site is privately owned and not accessible to the public. The Proposed Project would not substantially degrade public views of the site or its surroundings. According to Figure 9 of the Imperial County Conservation and Open Space Element the Proposed Project is mapped in an area designated to have a Low Value of Maintenance of Visual Quality. The Proposed Project would not degrade the visual character of surrounding public views. No impacts are projected.

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

No light or glare sources are currently located on-site, as noted in Section E, number 4 of the Imperial County Conservation and Open Space Element (2016). Additionally, implementation of the Proposed Project would not result in the construction of sources of substantial glare or light. No impact is projected.

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II. AGRICULTURE AND FOREST 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?

The Proposed Project would convert approximately 250 acres of undeveloped land into farmland. The Proposed Project would not convert Unique or Prime farmland to non-agricultural use. No impact is projected.

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

The Proposed Project would remain consistent with permissible land use. According to the existing parcels consist of S-1 (Open Space) and M-1 (Light Industrial) zoning. The subject property is not subject to an existing Williamson Act Contract. Therefore, no impact would occur.

- 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))?

There are no timber resources on or near the Proposed Project. No impact is projected.

- d) Result in the loss of forest land or conversion of forest land to non-forest use?

The Proposed Project does not contain forest land. The subject property consists primarily of undeveloped desert land. No impact is projected.

- 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?

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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The Proposed Project would not result in conversion of farmland to non-agricultural use. The Proposed Project would convert open space into agricultural use. The Proposed Project area contains no forest area. No impacts would occur.

III. AIR QUALITY

The Proposed Project site lies within the Air Basin, which is managed by the Imperial County Air Pollution Control District (ICAPCD). National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) have been established for the following criteria pollutants: carbon monoxide (CO), ozone, sulfur dioxide (SO₂), nitrogen dioxide (NO₂), inhalable particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), and lead. The CAAQS also set standards for sulfates, hydrogen sulfide, and visibility.

Areas are classified under the Federal Clean Air Act as either "attainment" or "nonattainment" areas for each criteria pollutant, based on whether the NAAQS have been achieved or not. Attainment relative to the state standards is determined by the California Air Resources Board (CARB). The Air Basin has been designated by the Federal Environmental Protection Agency (EPA) as a nonattainment area for ozone, PM₁₀, and PM_{2.5}. Currently, the Air Basin is in attainment with the NAAQS for CO, SO₂, and NO₂.

The ICAPCD has addressed each of three nonattainment pollutants in separate State Implementation Plans (SIPs). For ozone the most current SIP is the Imperial County 2017 State Implementation Plan for the 2008 8-Hour Ozone Standard (2017 Ozone SIP), prepared by IPACD, September 2017, which was prepared to detail measures to reduce ozone precursors (i.e. ROG and NOx) within the County in order to meet the 2008 NAAQS for 8-hour ozone standard of 0.075 parts per million (ppm) by July 20, 2018. Although the Ozone 2017 SIP demonstrates that the County met the 8-hour ozone standard 0.075 ppm by the July 20, 2018, requirement, it should be noted that in 2015 the EPA further strengthened its 8-hour ozone standard to 0.070 ppm, which will require an updated SIP for the County to meet the new ozone standard.

Since PM₁₀ in the County has met the 24-hour NAAQS other than for exceptional events that include storms as well as from substantial PM₁₀ concentrations blowing into the County from Mexico, the most current PM₁₀ plan is the Imperial County 2018 Redesignation Request and Maintenance Plan for Particulate Matter less than 10 Microns in Diameter (2018 PM₁₀ Plan), prepared by ICAPCD, October 23, 2018. The 2018 PM₁₀ Plan shows that the monitoring of PM₁₀ in the County found that other than exceptional events, no violation of the 24-hour PM₁₀ NAAQS of 150 µg/m³ occurred over the 2014 to 2016 time period. As such, the ICAPCD has requested the EPA to redesignate the Air Basin to maintenance.

For PM_{2.5} the most current SIP is the Imperial County 2018 Annual Particulate Matter less than 2.5 Microns in Diameter State Implementation Plan (2018 PM_{2.5} SIP), prepared by ICAPCD, April 2018, which was prepared to detail measures to meet the 2012 NAAQS for annual PM_{2.5} standard of 12 µg/m³ by the end of 2021 for the portion of Imperial County (approximately from Brawley to Mexico border) that is designated nonattainment. The PM_{2.5} Plan found that the only monitoring station in the County that has recorded an exceedance of PM_{2.5} is the Calexico Monitoring Station that is likely caused by the transport of PM_{2.5} across the Mexico border. It is anticipated that the ICAPCD will submit a redesignation request for PM_{2.5} in the near future.

Although ICAPCD is responsible for air quality planning efforts in the County, it does not have the authority to directly

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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regulate air quality issues associated with new development projects. Instead, this is controlled through local jurisdictions in accordance to CEQA. In order to assist local jurisdictions with air quality compliance issues, the ICAPCD has prepared the CEQA Air Quality Handbook (ICAPCD, 2017). The purpose of the Handbook is to assist lead agencies in evaluating a project’s potential air quality impacts and provides direction on how to evaluate potential air quality impacts, how to determine whether these impacts are significant and how to mitigate these impacts. The Handbook provides the following standard measures for dust control and use of combustion equipment that all construction projects in the Air Basin are required to implement:

- All disturbed areas, including Bulk Material storage which is not being actively utilized, shall be effectively stabilized and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by using water, chemical stabilizers, dust suppressants, tarps, or other suitable material such as vegetative ground cover.
- All onsite and off-site unpaved roads will be effectively stabilized and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering.
- All unpaved traffic areas one (1) acre or more with 75 or more average vehicle trips per day will be effectively stabilized and visible emission shall be limited to no greater than 20 percent opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering.
- The transport of Bulk Materials shall be completely covered unless 6 inches of freeboard space from the top of the container is maintained with no spillage and loss of Bulk Material. In addition, the cargo compartment of all Haul Trucks is to be cleaned and/or washed at delivery site after removal of Bulk Material.
- All Track-Out or Carry-Out will be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an Urban area.
- Movement of Bulk Material handling or transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers or by sheltering or enclosing the operation and transfer line.
- The construction of any new Unpaved Road is prohibited within any area with a population of 500 or more unless the road meets the definition of a Temporary Unpaved Road. Any temporary unpaved road shall be effectively stabilized and visible emissions shall be limited to no greater than 20 percent opacity for dust emission by paving, chemical stabilizers, dust suppressants and/or watering.
- Use alternative-fueled or catalyst-equipped diesel construction equipment, including all off-road and portable diesel powered equipment.
- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes as a maximum.
- Limit, to the extent feasible, the hours of operation of heavy duty equipment and/or the amount of equipment in use.
- Replace fossil-fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set)

Since the Proposed Project site is located in an area that is known to experience high winds, the Proposed Project would also need to implement the fugitive dust reduction measures provided in the High Wind Exceptional Event Fugitive Dust Mitigation Plan for Imperial County, (ICAPCD, 2018). The High Wind Plan requires the implementation of various measures to limit fugitive dust emissions when sustained winds exceed 25 miles per hour.

Since the Proposed Project will utilize off-road diesel equipment that will emit air emissions, the Proposed Project will be required to obtain an ICAPCD permit under Rule 201. The Permit will require the applicant to demonstrate that all off-road equipment utilized are registered with CARB

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or the ICAPCD. The Permit also requires the applicant to quantify the emissions created from the specific equipment utilized during construction of the Proposed Project in order to ensure that the air emissions created from the off-road equipment utilized during construction activities are within the ICAPCD standards.

Where available, the significance criteria established by the applicable air quality management district 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?

The Proposed Project would not conflict with the applicable air quality plans, which include the 2017 Ozone SIP, 2018 PM₁₀ Plan, and 2018 PM_{2.5} SIP that are described above. The CEQA Air Quality Handbook, prepared by ICAPCD, November 2007, requires large residential and commercial developments to develop an EIR.² Projects that have the potential to exceed the ICAPCD thresholds of significance for its operations are considered large developments and are required to demonstrate consistency with the regional air quality plans. The Proposed Project consists of development of water well and would not include any residential or commercial development, nor does the project require the preparation of an EIR. Accordingly, the Proposed Project would not conflict with or obstruct implementation of the applicable air quality plan.

- 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?

Imperial County is designated by the United States Environmental Protection Agency (USEPA) as non-attainment for the ozone and particulate matter less than ten microns in diameter (PM₁₀) National Ambient Air Quality Standards (NAAQS) with a portion of the County designated as non-attainment for the particulate matter less than 2.5 microns in diameter (PM_{2.5}) NAAQS. Similarly, the area does not attain California ambient air quality standards (CAAQS) for ozone, PM₁₀ and PM_{2.5}. Air quality impacts are anticipated to be minimal due to fugitive dust associated with agricultural use.

The Applicant will implement BMPs during construction and operation to minimize potential impacts. PM₁₀ Impacts would be less than significant.

Construction of the Proposed Project would create air emissions primarily from equipment exhaust and fugitive dust. Construction of the commercial water well would begin when all necessary permits are obtained, expected to be 2023. Construction is expected to be complete in approximately one month. All work would occur in one phase, with work occurring during daylight hours over five or six days per week. Approximately four workers are anticipated at peak periods. Well drilling and construction work is expected to be Monday through Saturday 7:00 am to 3:00 pm.

Development of the farming portion of the Proposed Project will occur over a number of years and will depend on the availability of organic soil amendment materials. It is anticipated that work would progress on two to four acre parcels and would include ripping and disking of the soils as is generally typical of any agricultural

² (Imperial County Air Pollution Control District)

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operation. Once initial disking is complete, then organics would be spread on the ground then disked and tilled into the soil to a depth of six feet +/- to ensure deep root zone penetration with organics. Initial estimates indicate approximately nine acres per year can be completed at the anticipated organics availability, which will take up to 27 years to be fully operational on all 250 acres. No import or export of soil would be required.

The Proposed Project's emissions for the commercial well would not exceed ICAPCD's construction-related criteria pollutant thresholds. In addition, construction emissions would be short-term, limited only to the period when construction activity is taking place and all construction activities are required to comply with ICAPCD regulations for controlling fugitive dust emissions, including the standard regulations for all projects provided in the CEQA Handbook and summarized above as well as Rule 800 – General Requirements for Control of PM10; Rule 802; Rule 802 – Bulk Materials; Rule 803 – Carry-Out and Track-Out; Rule 804 – Open Areas; and Rule 805 – Unpaved Roads. As such, construction-related emissions would be less than significant for the Proposed Project.

Due to the nominal operational emissions created from the Proposed Project, it is also anticipated that the cumulative operational emissions created from the Proposed Project will be less than significant.

- c) Expose sensitive receptors to substantial pollutants concentrations?

As discussed above in (b), the criteria pollutant emissions for construction activities are assumed to be less than significant due to the limited amount of criteria pollutants created from construction activities. The nearest sensitive receptor consists of a single-family residence on Air Park Drive, located approximately 1,300 feet from the Proposed Project limits.

In addition, to the criteria pollutant emissions, construction activities have the potential to expose nearby sensitive receptors to toxic air contaminants (TACs), which would be created from the operation of diesel-powered equipment in the form of diesel particulate matter (DPM). According to SCAQMD methodology, health effects from TACs are usually described in terms of "individual cancer risk". "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Given the relatively limited number of heavy-duty construction equipment, the varying distances that construction equipment would operate to the nearby sensitive receptors, and the short-term construction schedule, the Proposed Project would not result in a long-term (i.e., 70 years) substantial source of toxic air contaminant emissions and corresponding individual cancer risk. In addition, California Code of Regulations Title 13, Article 4.8, Chapter 9, Section 2449 regulates emissions from off-road diesel equipment in California. This regulation limits idling of equipment to no more than five minutes, requires equipment operators to label each piece of equipment and provide annual reports to CARB of their fleet's usage and emissions. This regulation also requires systematic upgrading of the emission Tier level of each fleet, and currently no commercial operator is allowed to purchase Tier 0 or Tier 1 equipment and by January 2023, no commercial operator is allowed to purchase Tier 2 equipment. In addition to the purchase restrictions, equipment operators need to meet fleet average emissions targets that become more stringent each year between years 2014 and 2023. Therefore, no significant short-term toxic air contaminant impacts would occur during construction of the Proposed Project.

Operational emissions would be limited to weekly or monthly vehicle trips to obtain pressure and temperature measurements well monitoring activities. As discussed above in (b), the criteria pollutant emissions have been calculated for operational activities, which were found to be within the ICAPCD's allowable operational

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thresholds. Due to the limited amount of criteria pollutants created from operational activities and the distances to the nearest sensitive receptors to the proposed irrigation well, operational emissions would not expose sensitive receptors to substantial concentrations of criteria pollutants that are anticipated to create nominal levels of emissions and would not result in a substantial increase in traffic volumes, which have the potential to create CO hotspots. As such, operation of the Proposed Project would result in a less than significant exposure of sensitive receptors to substantial pollutant concentrations.

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

Any diesel equipment used during construction of the Proposed Project would consist of mobile equipment that would not be stationary for a long period of time, allowing the odors to disperse rapidly and not impact any nearby receptors. Well construction activities would also result in the discharge of drilling mud that will be stored onsite in a containment basin. It is anticipated that due to the climate of the project site, any drilling mud would evaporate and harden quickly, which upon hardening will cease the release of odors. Since well drilling is anticipated to be temporary, the odors would be temporary, and the odor impacts would be likely not be noticeable at the nearest sensitive receptors. Additionally, farming practices will not result in any permanent odors and any odors generated from the farming practice will dissipate quickly due to the prevailing winds. Therefore, construction and operation of the Proposed Project would not create objectionable odors affecting a substantial number of people, and impacts would be 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?

Surveys to document special status flora and fauna species were conducted January 2023 by Chambers Group, Inc. biological staff. All detected wildlife and botanical species were recorded, as were observed vegetation communities within and adjacent to the survey corridors. Wildlife species were detected either by observation, by vocalization, or by sign (e.g., tracks, burrows, scat). The botanical inventory was floristic in nature, meaning that all plants observed were identified to the taxonomic level needed to determine whether they were special- status plant species. Vegetation communities were classified according to Holland (1986).

Vegetation communities consisted primarily of Sonoran creosote bush scrub and desert saltbush scrub. Eight special- status plant species were observed within the Proposed Project area during the surveys. A list of plant species observed during the field surveys is provided in Appendix A.

Special Status Plant Species

A total of 15 special-status plant species have potential to occur within the Proposed Project area. Of the 15 plant species considered to have a potential to occur, one has a high potential to occur, 6 species have a

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moderate potential to occur, and one species have a low potential to occur. One special status species, Salton milk vetch, was found within the survey area and is considered present. None of the special status plant species with potential to occur are federally or state listed species.

Special Status Wildlife Species

Literature review identifies a total of 17 wildlife species with the potential to occur within the Proposed Project area. Of the 17 wildlife species, one species is confirmed present within the Proposed Project area, and one species is likely present.

Two adult burrowing owls (BUOWs) with active burrows were observed within the project site. BUOWs are considered present within the project site. In addition, Flat-tailed horned lizard was not observed in the project site; however, high-quality habitat is present, and this species has been observed within less than a mile of the project site. Therefore, this species is considered to have a high potential to occur within the site.³

The Applicant will secure all the necessary permits, memorandums of understanding, or permissions identified in Section II of this document. Impacts to special- status species would be avoided where feasible, and where not feasible, impacts would be reduced via implementation of the mitigation measures identified below.

Due to the potential for the Proposed Project to impact special- status species, the following mitigation measures would be implemented to ensure that impacts to special- status species would be reduced to a level below significant. Following implementation of the mitigation measures identified below would result in a less than significant impact associated with special- status species.

Based on the presence of BUOW, likely presence of Flat-tailed horned lizard, and potential for special-status plants, the Proposed Project includes the following measures to avoid and/or minimize potential impacts to regulated special status plants, wildlife, and habitat, listed below:

MM-BR-1: Prior to the start of Project activities, an environmental education program will be provided for all project personnel. The education program will include the following: (1) the potential presence of covered species and their habitats, (2) the requirements and boundaries of the project, (3) the importance of complying with avoidance and minimization measures, (4) environmentally responsible construction practices, (5) identification of special status resource areas in the field, and (6) problem reporting and resolution methods.

MM-BR-2: Protocol surveys for BUOW in compliance with the CDFW Staff Report on BUOW Mitigation (CDFG, 2012) in suitable habitat for this species should be conducted prior to construction activities. According to the protocol, an additional preconstruction or avoidance/take survey will be conducted for the BUOW within 30 days of construction in all suitable habitat within the proposed Project.

MM-BR-3: Protocol surveys for flat-tailed horned lizard should be conducted prior to construction activities. Although no CDFW protocol for flat-tailed horned lizard currently exists, according to the Flat- tailed Horned Lizard Rangelwide Management Strategy (May 1997), flat-tailed horned lizards are most active between March and October; therefore, surveys should be conducted during this period when flat-tailed horned lizards are most active.

³ *Ibid*

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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MM-BR-4: If any ground disturbing activities are planned during the BUOW nesting season (approximately February 1 through August 31), avoidance measures shall include a no construction buffer zone of a minimum distance of 250 feet, consistent with the Staff Report on BUOW Mitigation (CDFG, 2012). Compliance shall be maintained with CDFW BUOW mitigation guidelines as detailed in the Staff Report on BUOW Mitigation (CDFG, 2012) or more recent updates, if available.

MM-BR-5: If vegetation disturbance or other Project activities will occur during the bird breeding season (February 15-August 31), a qualified biologist shall conduct a preconstruction nesting survey to ensure that no active nests are present within or adjacent to the Survey Area. If an active nest is observed that may be impacted by Project-related activities, avoidance measures shall be implemented to avoid impacting the nest. Avoidance measures include delaying construction within the immediate vicinity of the active nest until the young have fledged or naturally failed, or instituting a buffer around the nest that prohibits construction activities to occur, but allows construction to continue outside the buffer. The appropriate avoidance buffer is to be determined by the qualified biologist based on vegetative cover, topography, stage of nest or young development, and species type.

MM-BR-6: A biological monitor shall be present prior to initiation of ground disturbing activities to demark limit of disturbance boundaries. Flagging and/or staking will be used to clearly define the work area boundaries and avoid impacts to drainage features. The biological monitor will be present throughout Project activities to conduct daily sweeps for flat-tailed horned lizard and inspect compliance with project protection measures. If a flat-tailed horned lizard or other special status species is found, the species shall be relocated out of harm's way whenever feasible. Any mortalities shall be reported to the agencies and County of Imperial. A final monitoring report will be submitted to CDFW and County of Imperial. The annual report shall include a summary of pre- construction surveys, biological monitoring, avoidance measures implemented, and whether the avoidance measures were effective.

MM-BR-7: Prior to construction, and within the appropriate blooming period, a qualified biologist will conduct a focused rare-plant survey for: gravel milk vetch (typically blooms February through June), Abrams' spurge (typically blooms September through November), Orcutt's woody-aster (typically blooms from March through April), Peirson's pincushion (typically blooms from March through April), brown turbans (typically blooms from March through April), hairy stickleaf (typically blooms from March through May), and sand food (typically blooms from April through June). If these species are identified, will be flagged and identified, and surrounded with a 10-foot no construction buffer. If federally or State-listed plant species are identified, the biologist will consult with CDFW and USFWS to determine appropriate course of action, which may include soil/seedbank collection and/or translocation.

With inclusion of the above avoidance, minimization and/or mitigation measures, The Proposed Project would not result in 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. Impacts from the Proposed Project to special status species, including plants and wildlife, would be 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?

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Chambers Group, Inc. biological staff performed pedestrian survey and jurisdictional delineation on January 13, 2023, included as Appendix A. The Proposed Project will be designed to avoid all the water features that occur within the site. Likewise, temporary impacts will be avoided through the use of BMP's; therefore, no impacts to Waters of the State or Waters of the U.S. are anticipated. The Proposed Project does not occur within a federally designated critical habitat unit.⁴

The project site features eight vegetation communities: Fourwing Saltbush Scrub, Disturbed Fourwing Saltbush Scrub, Creosote Bush Scrub, Creosote Bush – White Bursage Scrub, Desert Pavement, Tamarisk Thickets, Mesquite Thickets, and Anderson's Boxthorn Scrub. The project site also features areas of Bare/Disturbed ground, a Man- Made Berm, and Developed areas. All vegetation communities outside of jurisdictional features are expected to be permanently impacted.⁵

The Proposed Project will remain in compliance with federal, state, and county ordinances protecting special status resources. The Proposed Project includes protection measures to avoid and minimize potential negative impacts to special status resources. The Proposed Project would not impact riparian habitat or other sensitive natural community. As described above in (a), the Proposed Project includes mitigation measures MM-BR1 through MM-BR-7.

Additionally, the Proposed Project would not result in temporary or permanent impacts to Waters of the U.S. or Waters of the State. Impacts would be potentially significant unless mitigation is incorporated.

- c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Chambers Group, Inc. biological staff performed a pedestrian survey and jurisdictional delineation for the project site (Survey Area) on January 13, 2023 (Appendix A). No wetland features (e.g., wetland plants, hydric soils) were identified within the Survey Area. Because this region only receives approximately 3 inches of rain a year, the washes identified within the Survey Area are most often dry and do not support distinct riparian/wetland vegetation.⁶

The Biological Resources Report and Jurisdictional Delineation identify several mapped drainage features run through the project site, including three blue-line riverine systems at the project site. However, project construction and operational activities would avoid these areas. No impacts would occur to mapped drainage features or blue-line riverine features.

There are several erosional and sheet flow features that occur throughout the Survey Area. Many of the erosional features are present as small gullies, which are forms of longitudinal (incising) erosion. The erosional cuts are often deeper than they are wide, with very steep banks and small beds. Gullies are younger than streams in geologic age and lack an OHWM. They are commonly found in this area, which consists of low-density vegetative cover and soils and thus subject to increased effects from erosion. Once a gully is formed, it conveys sheet flow from infrequent and short duration flows. Based on the field survey, these

⁴ Ibid

⁵ Ibid

⁶ Ibid

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erosional features terminate before connecting to any other mapped hydrological features.

The Proposed Project will be designed to avoid all the water features that occur within the site and temporary impacts will be avoided through the use of BMP's; therefore, no impacts to Waters of the U.S. or Waters of the State are anticipated to occur as a result of Project activities, thus regulatory permits should not be required for impacts to Waters of the U.S. or Waters of the State.

Accordingly, the Proposed Project would not impact federally protected wetlands, drainages, or riverine systems. The Proposed Project would not result in temporary or permanent impacts to Waters of the U.S. or Waters of the State.

The Proposed Project includes MM-BR-6, described above in (a). Accordingly, no impacts would occur.

- 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?

Wildlife corridors comprise areas connecting suitable habitat in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features, such as canyons, drainages, ridgelines, or areas with dense vegetation cover can provide corridors for wildlife travel. Wildlife corridors are important to mobile species because they provide access to individuals to find shelter, mates, food, and water; allow the dispersal of individuals away from high population density areas; and allow immigration and emigration of individuals to other populations, providing for gene flow between populations. Three large washes present on site (Drainages 1, 2 and 4) and the smaller wash (Drainage 3), identified in the Biological Resources Report. The drainages and on site washes serve as wildlife corridors providing a migration pathway for small to large mammal species (e.g., black-tailed jackrabbits, mule deer, and coyotes) from the surrounding areas including the mountain ranges to the west to water sources such as the Salton Sea. However, project activities and access roads will not impact drainage features within the site. These areas would be protected in place; no impacts would occur.⁷ The Proposed Project would thus avoid impacts to migration corridors and allow migration of wildlife through the site. Therefore, potential impacts to wildlife migration corridors would be potentially significant unless mitigation is incorporated.

Accordingly, the Proposed Project includes measures MM-BR-1 through MM-BR-7, described in (a) above. With incorporation of these measures, potential impacts of the Proposed Project would be less than significant.

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

The County of Imperial General Plan Open Space Conservation Policy requires detailed investigations to be conducted to determine the significance, location, extent, and condition of natural resources in the County. If any rare, sensitive, or unique plant or wildlife habitat would be impacted by a project, the County must notify the agency responsible for protecting plants and wildlife before approving the Proposed Project.

⁷ Ibid

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Construction of the Proposed Project is not anticipated to conflict with any local policies or ordinances protecting biological resources during construction or operation of the Proposed Project. Consistent with the County's Open Space Conservation Policy, appropriate studies have been prepared for the site. Additionally, implantation of Mitigation Measures MM-BIO-1 through MM-BIO-7 would reduce any potential impacts to rare, sensitive, or unique plant or wildlife habitat to less than significant; therefore, this impact is potentially significant unless mitigation is incorporated.

- 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?

No Habitat Conservation Plan has been adopted for the region. Therefore, the Proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan.⁸ No impact is projected.

V. CULTURAL RESOURCES

Would the project:

- a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Chambers Group, Inc. completed an Archaeological Survey Report, dated March 2023, for the Proposed Project, included as Appendix B. Based on the Archeological Survey Report and corresponding pedestrian survey, Chambers Group archaeologists identified 40 cultural resource localities during the systematic survey of the project site. Two newly identified resources were in close proximity to previously recorded archaeological sites, and these new data have been included in updates to those sites (P-13-017175 and -017184).

A total of 17 resources were identified as isolated occurrences (IO or isolates). Isolates consist of fewer than three artifacts within a defined area (not more than 30 meters from each artifact). A total of 21 resources were identified as sites. While an archaeological site usually consists of three or more artifacts, single features, such as stacked rock cairns or isolated thermal features, are considered sites.⁹

All 17 identified isolates are prehistoric lithic resources, which represent a total of 26 items. These consists predominately of lithic debitage, such as primary flakes (11 of a total of 26 items, or 42 percent), secondary flakes (5 of 26, or 19 percent), or angular waste (2 of 26, or 8 percent). Other items include assayed cobbles (these generally exhibit fewer than four flake removals and are indicative of a rejected lithic source) (3 of 26, or 12 percent), cores (3 of 26, or 12 percent), and scrapers (2 of 26, or 8 percent).¹⁰

A total of 16 of the 40 localities identified are prehistoric-period archaeological sites. These comprise eight lithic scatters (50 percent), five artifact scatters (31 percent), two habitation sites (12 percent), and a food resource

⁸ (California Department of Fish and Wildlife)

⁹ (Chambers Group, Inc.)

¹⁰ *Ibid*

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processing site (6 percent).¹¹

A total of five historic-period localities were identified within the project site. Two of the resources are stacked sandstone cairns. These are temporally ambiguous as cairn construction transcend temporal assignments and are found in both prehistoric- and historic-period settings. However, the condition and context of these two resources appear to favor an historic-period construction. Two deposits were identified as trash scatters. Both appear to be one-time events associated with a particular activity taking place within the project site. One appears to be associated with construction or maintenance of the Salton Sea Airport runway apron, and one appears to be associated with a gravel or road construction operation. The last deposit appears to be a 1960s-era campsite likely associated with game-hunting activity.

No recorded fossil localities have been identified within a one-mile radius of the project site. Additionally, no paleontological materials were observed during the survey. The SDNHM, however, notes that sensitive late Pleistocene- to Holocene-age Lake Cahuilla Beds exist within the Proposed Project, and subsurface ground-disturbing activities have the potential to impact sensitive paleontological resources.

Additionally, the records search and archaeological survey resulted in the identification of 118 resources within 1/4-mile radius of the project site. In addition to the 15 previously recorded sites and isolates within the project site, Chambers Group identified a further forty new sites and isolates during the survey. Furthermore, a previously recorded resource located outside the project site was found to extend beyond its prior recorded limits and transect the project site.

The preferred mitigation is avoidance of significant cultural resources is through project design. Resources found to be not significant will not require mitigation. If avoidance of direct impacts to resources CGI-21397-07, -10, -13, -14, -32, -37, and P-13-017175 and -017176, or other previously unknown eligible or potentially eligible resource(s), is not feasible, the County will ensure that potentially impacted archaeological sites are assessed for significance, as defined by PRC § 21083.2 or CEQA Guidelines § 15064.5 et. seq., through implementation of Phase II investigations. Should Phase II testing of these, or any previously unknown archaeological site, exhaust the data potential of the site, Project impacts will be reduced to a less than significant level by adopting the recommended mitigation measures below (MM-CR-1 through MM-CR-5).

Impacts to an archaeological site found to be significant under CRHR Criterion 4 may be mitigated through a Phase III data recovery program. For such a site, prior to any ground-disturbing activities, a detailed archaeological treatment plan shall be prepared and implemented by a Qualified Archaeologist. Data recovery investigations shall be conducted in accordance with the archaeological treatment plan to ensure collection of sufficient information to address archaeological and historical research questions, and results shall be presented in a technical report (or reports) describing field methods, materials collected, and conclusions. Additional testing and/or data recovery phases may involve additional excavation and/or more detailed recordation of resources or more comprehensive archival research. Any cultural material collected as part of an assessment or data recovery effort should be curated at a qualified facility. Field notes and other pertinent materials should be curated along with the archaeological collection. If a resource is found to be significant under CRHR Criterion 1, 2, or 3, alternative mitigation measures may be developed by the Qualified Archaeologist, in consultation with the County.

Based on the above findings, the Proposed Project would implement the following mitigation measures:

¹¹ *Ibid*

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MM-CR-1: A Qualified Archaeologist, meeting the Secretary of the Interior Standards or County standards, whichever is greater, shall be retained to prepare a Cultural Resources Management Plan (CRMP) in advance of project construction. The CRMP shall be prepared to include a Phase II significance identification and treatment plan, per PRC § 21083.2 and CEQA Guidelines § 15064.5 et. seq., to evaluate all cultural resources that cannot be avoided. For those resources that are identified as a significant cultural resource through the Phase II evaluation, and which cannot be avoided, a Phase III data recovery program shall be prepared. The data recovery plan shall make provisions for adequately recovering the scientifically consequential information from and about the resource, and shall be prepared and adopted prior to any excavation being undertaken. Following the data recovery plan, the Qualified Archaeologist shall prepare a Mitigation Monitoring Reporting Plan.

MM-CR-2: All initial ground-disturbing work within 100 feet (30 meters) of all previously identified significant cultural resources shall be monitored by an archaeological specialist (archaeological monitor) proficient in artifact and feature identification in monitoring contexts. Prior to initial ground-disturbing work the Qualified Archaeologist, and/or archaeological monitor, shall be present at the Proposed Project construction-phase kickoff meeting. The Qualified Archaeologist, and/or archaeological monitor, shall conduct initial Worker Environmental Awareness Program (WEAP) training to all construction personnel, including supervisors, present at the start of the Proposed Project construction work phase, for which the Applicant, or their designated Contractor, and all subcontractors shall make their personnel available. A tribal monitor, if required following consultation with the County, shall be provided an opportunity to attend the pre-construction briefing, if requested. This WEAP training will educate construction personnel on how to work with the monitor(s) to identify and minimize impacts to archaeological resources and maintain environmental compliance. This WEAP training will educate the monitor(s) of construction procedures to avoid construction-related injury or harm. This training may be performed periodically, such as for new personnel coming on to the Proposed Project as needed.

MM-CR-3: The Applicant, or their designated Contractor, shall provide the Qualified Archaeologist with a schedule of initial potential ground-disturbing activities. A minimum of 48 hours will be provided to the Qualified Archaeologist prior to the commencement of any initial ground-disturbing activities, such as vegetation grubbing or clearing, grading, trenching, or mass excavation.

MM-CR-4: The archaeological monitor, under the direction of the Qualified Archaeologist, shall observe initial ground-disturbing activities and, based on the initial observations and in consultation with the Qualified Archaeologist, may adjust the monitoring approach as needed to provide adequate observation and oversight. All on-site monitors will have authority to temporarily halt and/or redirect construction to allow for recordation and evaluation of any and all finds. The archaeological monitor will maintain a daily record of observations to serve as an ongoing reference resource and to provide a resource for final reporting upon completion of the Proposed Project.

MM-CR-5: At the completion of all ground-disturbing activities, the Qualified Archaeologist shall prepare an Archaeological Resources Monitoring Report summarizing all monitoring efforts and observations, as performed, and any and all prehistoric or historic archaeological finds, as well as providing follow-up reports of any finds to the South Coastal Information Center (SCIC), as required.

Per CEQA Guidelines, the Proposed Project should be designed to avoid impacts to significant cultural resources within the project site whenever feasible. Given that Chambers Group did identify new cultural resources during the survey of the project site, the mitigation measures identified above are required to ensure that potential impacts to cultural resources are reduced to less than significant.

With implementation of the above mitigation measures, potential impacts would remain below the level of significance; thus, the Proposed Project would not cause a substantial adverse change in the significance of

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a historical resource pursuant to §15064.5. Impacts would be less than significant.

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

Based on results of the Archeological Survey Report, the Proposed Project would not result in a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5; however, impacts to unknown archaeological resources could occur. Implementation of the mitigation measures MM-CR-1 through MM-CR-6; and MM-PR-1 through MM-PR-5 would reduce any potential impacts associated with an archaeological resource to less than significant.

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

Based on a records search requested from the SDNHM the project site has paleontological sensitivity. Accordingly, the Applicant will retain a Qualified Paleontologist, and a paleontological monitor will be present on-site during construction actions that may encounter sensitive resource-bearing deposits (MM-PR 1).

In the event of potential discovery of human remains, the Proposed Project will include the following measure:

MM-CR-6: In the event that human remains are discovered during ground-disturbing activities, the Proposed Project shall comply with California HSC § 7050.5, CEQA § 15064.5, and California PRC § 5097.98 (NPS 1983). If human remains are found during ground-disturbing activities, State of California HSC § 7050.5 states that no further disturbance shall occur until the County Medical Examiner–Coroner has made a determination of origin and disposition pursuant to PRC § 5097.98. In the event of an unanticipated discovery of human remains, the County Medical Examiner–Coroner shall be notified immediately. If the human remains are determined to be prehistoric, the Medical Examiner–Coroner shall notify the NAHC, which shall identify and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials (NPS 1983).

Therefore, with implementation of the above mitigation measures, potential impacts with respect to disinterred human remains would be reduced to less than significant.

VI. ENERGY

Would the project:

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

Construction of the Proposed Project would result in the significant need for energy resources. Energy demands would not be substantial. Operation of the well site would not result in wasteful, inefficient, or unnecessary consumption of energy resources; the well associated with the Proposed Project would not involve the construction of structures (residential, commercial, or industrial) that would require daily usage of

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energy resources. This impact is less than significant.

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

The Proposed Project would not conflict or obstruct a renewable energy or energy efficiency plan. The Proposed Project would remain consistent with the County of Imperial prepared a Renewable Energy and Conservation Element.¹² Therefore, impacts would be less than significant with regard to energy usage and renewable energy plans.

VII. GEOLOGY AND SOILS

Would the project:

- a) Directly or indirectly cause potential substantial adverse effects, including risk of loss, injury, or death involving:
- 1) 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 Division of Mines and Geology Special Publication 42?

In accordance with the Alquist-Priolo Special Studies Zone Act (Chapter 7.5, Division 2, Public Resources Code, State of California, effective May 4, 1975) the Office of State Geologist delineated Special Study Zones which encompass potentially and recently active traces of four major faults (San Andreas, Calaveras, Hayward and San Jacinto). The Alquist-Priolo Special Study Zone Act is enforced by the County to assure that homes, offices, hospitals, public buildings, and other structures for human occupancy which are built on or near active faults, or if built within special study areas, are designed and constructed in compliance with the County of Imperial Codified Ordinance.

Construction of the Proposed Project would not result in the construction of any structure intended for human occupancy. Additionally, the Proposed Project area is not located within or adjacent to any earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map (County of Imperial 1997). There would be no impacts relating to the rupture of a known earthquake fault.

Based on the California Department of Conservation data, the project site is not located on or within 5 miles any known faults.¹³ All construction shall comply with the most current California Uniform Building Code (Section 1626 through 1635), requiring development to incorporate the most stringent earthquake resistant measures. The Proposed Project scope does not include habitable structures. Therefore, with adherence to the above reference codes, impacts would be less than significant.

¹² (Imperial County Planning and Development Department)

¹³ (California Department of Conservation)

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- 2) Strong Seismic ground shaking?

California rests on the boundary between the North American Plate and the Pacific Plate. The San Andreas Fault system is located where the northwesterly drifting Pacific Plate grinds along and is subducted by the southwesterly drifting North American Plate. Baja, and California west of the fault system, are part of the Pacific Plate and move northwest compared to the rest of California and North America.

Southern California is a seismically active region, therefore it is highly likely that regional earthquakes would occur that could affect the Proposed Project site (County of Imperial 1997); though, as noted in section a) 1), no active faults are underlying or adjacent to the Proposed Project. Design and construction of the Proposed Project would be required to conform to the specific mandated structural design requirements to protect against strong seismic shaking, the potential impacts due to strong seismic ground shaking are a less than significant impact.

- 3) Seismic-related ground failure, including liquefaction and seiche/tsunami?

The geology that makes up Imperial County includes young, unconsolidated sediments of the Salton Trough that are subject to failure during earthquakes, especially throughout the irrigated portions of Imperial Valley where the soil is generally saturated. Liquefaction, and related loss of foundation support, is a common hazard in these areas (County of Imperial 1997).

A seiche is a to and from vibration of a body of water like the slopping of water in a jolted basin. Once initiated, the water body continues to oscillate independently. Seiches can be triggered by seismic events such as earthquakes. The most likely location for a significant seiche to occur is the Salton Sea. While there have been a number of seismic events since the formation of the Salton Sea, no significant seiches have occurred to date (County of Imperial 1997).

The irrigation associated with the Proposed Project would not be not located within an irrigated portion of Imperial Valley, causing the risk of liquefaction in the area to be low. Additionally, despite the Proposed Project area being close proximity to the Salton Sea, seiches in the area are unlikely. Additionally, the Proposed Project is approximately 80 miles from the nearest ocean, the Pacific Ocean, and therefore are too far to be at risk of experiencing a tsunami. Impacts associated with seismic-related ground failure, including liquefaction and seiche/tsunami are less than significant.

- 4) Landslides?

A landslide refers to slowly to very rapidly descending rock or debris caused by the pull of gravity. Landslides affect humans in many ways. A very rapid landslide could result in casualties and devastating property damage while a slow landslide could result in the nuisance of having a fence slowly pulled apart. The cost in lives and property from landslides is surprisingly high. According to the U.S. Geological Survey, more people in the United States died from landslides during the last three months of 1985 than were killed by all other geologic hazards, such as earthquakes and volcanic eruptions. The damage to property from landslides each year exceeds the cost of earthquake damage for the last twenty years.¹⁴

14 (County of Imperial)

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The Proposed Project is located in a relatively flat portion of Imperial County and are not identified as an area at risk of landslide (County of Imperial 1997); therefore, impacts associated with landslides are considered less than significant.

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

Erosion is the removal of rock fragments or soil by the action of running water, glacial ice, or wind. Human activities can accelerate erosion. The areas in Imperial County that are most subject to erosion are the Algodones Sand Dunes paralleling the East Mesa and Superstition Mountain, and the Chocolate, Picacho, Cargo Muchacho, and Coast Range Mountains. The remainder of Imperial County is generally flat and experiences low levels of natural erosion.¹⁵

Although the Proposed Project is located in a relatively flat area identified as having low erosion potential (County of Imperial 1997), the preparation of a SWPPP would be required due to the size of the disturbed area exceeding one acre. The SWPPP would identify best management practices (BMPs) that would reduce any impacts associated with soil erosion or loss of topsoil; therefore, this impact is less than significant.

MM-GEO-1: Applicant will prepare a SWPPP consistent with the requirements of the California State Water Resources Control Board (SWRCB) to reduce the potential for water pollution and sedimentation from proposed Project activities. The SWPPP will be project specific and expressly address site runoff, assuring that project runoff would not affect or alter drainage patterns to sensitive habitat.

- 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?

Subsidence is the gradual, local settling or sinking of the earth's surface with little or no horizontal motion. Subsidence is usually the result of gas, oil, or water extraction, hydrocompaction, or peat oxidation, and not the result of a landslide or slope failure. Ground surface effects related to subsidence are generally restricted to long surface structures such as canals, drains, and sewers, which are sensitive to slight changes in elevation. Subsidence from earthquakes and other activities can disrupt drainage systems and cause localized flooding.

According to Department of Conservation Regulatory Maps, the project site is not located on an unstable land unit, or subject to erosion, landslide, liquefaction, subsidence, or collapse.¹⁶ The Proposed Project would comply with the California Department of Water Resources (DWR) Guidelines and Imperial County Ordinance Title 9, Division 21 – Water Well Regulations. Adherence to DWR guidelines and the County Ordinance regulating water wells reduce any impacts associated with subsidence; therefore, this impact is less than significant.

¹⁵ *Ibid*

¹⁶ *Ibid*

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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- d) Be located on expansive soil, as defined in the latest Uniform Building Code, creating substantial direct or indirect risk to life or property?

Expansive soils are soils that expand when water is added and shrink when they dry out. This continuous change in soil volume can cause structures built on this soil to move unevenly and crack; expansive soils are commonly associated with clay rich soils.

The soils underlying the Project Proposed site are sedimentary rock. Additionally, construction of the Proposed Project would not result in the establishment of permanent structures. Therefore, impacts associated with expansive soils are less than significant.

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

The Proposed Project would not require the use of septic systems or alternative wastewater systems to accommodate wastewater needs. No impact would occur.

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

Chambers Group, Inc. prepared an Archaeological Resource Survey Report for the Proposed Project, dated March 2023, for the Proposed Project (Appendix B). Based upon literature review, the project site contains no known paleontological resources or unique geologic features; however, the possibility of uncovering unknown paleontological resources is present to the high potential for the site to contain paleontological resources. With implementation of measures MM-PR-1 through PR-5, as follows, potential impacts to paleontological resources would be reduced to less than significant.

MM-PR-1: The Applicant shall retain the services of a Qualified Paleontologist and require that all initial ground-disturbing work be monitored by someone trained in fossil identification in monitoring contexts. The Qualified Paleontologist shall prepare a Paleontological Resource Mitigation Plan to be implemented during ground-disturbing activity for the proposed Project. This program should outline the procedures for paleontological monitoring, including extent and duration; protocols for salvage and preparation of fossils; and the requirements for a final mitigation and monitoring report. The Qualified Paleontologist and a paleontological monitor shall be present at the Proposed Project construction-phase kickoff meeting.

MM-PR-2: Prior to commencing construction activities and thus prior to any ground disturbance in the project site, the Qualified Paleontologist and paleontological monitor shall conduct initial WEAP training to all construction personnel, including supervisors, present at the start of the Proposed Project construction work phase, for which the Applicant, or their designated Contractor, and all subcontractors shall make their personnel available. This WEAP training will educate construction personnel on how to work with the monitor(s) to identify and minimize impacts to paleontological resources and maintain environmental compliance and shall be performed periodically for new personnel coming on to the Proposed Project as needed.

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MM-PR-3: The Applicant, or their designated Contractor, shall provide the Qualified Paleontologist with a schedule of initial potential ground-disturbing activities. A minimum of 48 hours will be provided to the consultant prior to the commencement of any initial ground-disturbing activities, such as vegetation grubbing or clearing, grading, trenching, or mass excavation.

As detailed in the schedule provided, a paleontological monitor shall be present on-site at the commencement of ground-disturbing activities related to the Proposed Project. The monitor, in consultation with the Qualified Paleontologist, shall observe initial ground-disturbing activities and, as they proceed, make adjustments to the number of monitors as needed to provide adequate observation and oversight. All monitors will have stop-work authority to allow for recordation and evaluation of finds during construction. The monitor will maintain a daily record of observations as an ongoing reference resource and to provide a resource for final reporting upon completion of the Proposed Project.

The Qualified Paleontologist, paleontological monitor, and the Applicant, or their designated Contractor, and subcontractors shall maintain a line of communication regarding schedule and activity such that the monitor is aware of all ground-disturbing activities in advance to provide appropriate oversight.

MM-PR-4: If paleontological resources are discovered, construction shall be halted within 50 feet of any paleontological finds and shall not resume until the Qualified Paleontologist can determine the significance of the find and/or the find has been fully investigated, documented, and cleared.

MM-PR-5: At the completion of all ground-disturbing activities, the Qualified Paleontologist shall prepare a Paleontological Resources Monitoring Report summarizing all monitoring efforts and observations, as performed, and any and all paleontological finds, as well as providing follow-up reports of any finds to the preferred paleontological repository, as required.

VIII. GREENHOUSE GAS EMISSION

Introduction

This section describes the regulatory setting and potential global climate change effects from implementation of the Proposed Project.

Regulatory Setting

Significant legislative and regulatory activities directly and indirectly affect climate change and GHGs in California. The primary climate change legislation in California is AB 32, the California Global Warming Solutions Act of 2006. AB 32 focuses on reducing greenhouse gas emissions in California, and AB 32 requires that GHGs emitted in California be reduced to 1990 levels by the year 2020. In addition to AB 32, Executive Order B-30-15 was issued on April 29, 2015 that aims to reduce California’s GHG emissions 40 percent below 1990 levels by 2030. In September 2016, AB 197 and SB 32 codified into statute the GHG emission reduction targets provided in Executive Order B-20-15. CARB is the state agency charged with monitoring and regulating sources of emissions of GHGs in California that contribute to global warming in order to reduce emissions of GHGs. The CARB Governing Board approved the 1990 GHG emissions level of 427 million tons of CO2 equivalent (MtCO2e) on December 6, 2007. Therefore, in 2020, annual emissions in California are required to be at or below 427 MtCO2e. The CARB Board approved the Climate Change Scoping Plan (Scoping Plan) in December 2008, the First Update to the Scoping Plan in May 2014, and California’s 2017 Climate Change Scoping Plan in November 2017. The Scoping Plans define a range of programs and activities that will be implemented primarily by state agencies but also include actions by local government agencies. Primary strategies addressed in the Scoping Plans include new industrial and emission control technologies; alternative energy generation

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technologies; advanced energy conservation in lighting, heating, cooling, and ventilation; reduced-carbon fuels; hybrid and electric vehicles; and other methods of improving vehicle mileage. Local government will have a part in implementing some of these strategies. The Scoping Plans also call for reductions in vehicle-associated GHG emissions through smart growth that will result in reductions in vehicle miles traveled (CARB 2008, 2014, 2017).

Would the project:

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

Neither the County of Imperial nor the ICAPCD has established significance thresholds for GHG emissions. In order to establish context in which to consider the GHG emissions created from the Proposed Project, this analysis reviewed guidelines used by other public agencies in California and found the most conservative GHG emissions threshold is detailed in *CEQA & Climate Change*, prepared by California Air Pollution Control Officers Association (CAPCOA, 2008), which recommends a threshold of 900 metric tons of CO₂e (MTCO₂e) per year from any project. It should also be noted that a direct comparison of construction GHG emissions with long-term thresholds would not be appropriate, since construction emissions are short-term in nature and would cease upon completion of construction. Other Air Districts, including the SCAQMD, recommend that GHG emissions from construction activities be amortized over 30 years, when construction emissions are compared to operational-related GHG emissions thresholds.

The Proposed Project includes installation of an irrigation well approximately 600-750 feet in depth, and conversion of approximately 250 acres of undeveloped land. The Proposed Project would require approximately 27 years to convert land for farming use at a rate of 9 acres per year. Analysis for the construction of nearby wells of similar characteristics indicate construction and operation of a similar facilities would result in approximately 34.81 metric tons/year of total GHG, which would not exceed the established annual GHG emissions threshold of 900 metric ton/year.¹⁷ As such, it could be concluded that the Proposed Project's construction-related GHG contribution is not "cumulatively considerable" and is therefore less than significant under CEQA.

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

The California State Legislature adopted AB 32 in 2006, that requires the State's GHG emissions by 2020 to meet the GHG emissions level created in 1990 and adopted AB 197 and SB 32 in 2016, that requires the State's GHG emissions to be 40 percent below 1990 levels by 2030.

Neither the County of Imperial nor the ICAPCD has adopted a climate action plan to reduce GHG emissions in the Proposed Project area. As shown above in impact (a), based on construction of similar nearby wells, the Proposed Project would be expected generate approximately 35 MTCO₂e per year, below the established GHG emission threshold of 900 MTCO₂e per year. Therefore, the Proposed Project would not conflict with any applicable plan, policy, or regulation adopted for reducing the emissions of GHGs. A less than significant

¹⁷ (Chambers Group, Inc)

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impact would occur.

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?

Vehicles and equipment used for irrigation well construction would contain or require the temporary, short-term use of potentially hazardous substances, such as fuels, lubricating oils, and hydraulic fluid. Hazardous substances would be stored in transportable containment trailers at locations within the construction staging area to minimize potential for accidental releases and/or spills. No other hazardous or potentially hazardous materials will be brought to the well site. Further, the Proposed Project would be required to comply with all applicable rules and regulations involving hazardous materials, including the State of California CCR Title 23 Health and Safety Regulations, the California Division of Occupational Safety and Health (Cal/OSHA) requirements, the Hazardous Waste Control Act, the California Accidental Release Prevention (CalARP) Program, and the California Health and Safety Code. Compliance with these measures would reduce any potential risk or impact associated with the transport, use, or disposal of hazardous materials. This impact is less than significant.

- b) Create a significant hazard to the public or the environment through reasonable, foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

As noted above, the Proposed Project would require the storage of hazardous materials; however, hazardous substances would be stored in transportable containment trailers at locations within the construction staging area to minimize potential for accidental releases and/or spills. No other hazardous or potentially hazardous materials will be brought to the well site. Further, the Proposed Project would be required to comply with all applicable rules and regulations involving hazardous materials, including the State of California CCR Title 23 Health and Safety Regulations, the California Division of Occupational Safety and Health (Cal/OSHA) requirements, the Hazardous Waste Control Act, the California Accidental Release Prevention (CalARP) Program, and the California Health and Safety Code. Compliance with these measures would reduce any potential risk or impact associated with the release of hazardous materials into the environment. This impact is 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?

The Proposed Project is not located within one-quarter mile of schools; nor are any schools proposed within a one-quarter mile radius of the project site. The nearest school to the Proposed Project is West Shores High School approximately 4 miles northeast. The Proposed Project would not result in a release of hazardous

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emissions, hazardous or acutely hazardous materials, or substances within 0.25 miles of an existing or proposed school. 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?

A review of federal and state standard and supplemental databases indicates the Proposed Project is not located within any identified hazardous material site pursuant to Government Code Section 65962.5. No hazardous materials sites are located within 0.25 mile of the Proposed Project area.¹⁸ The Proposed Project would not create a significant hazard to the public or environment. No impacts would occur.

- 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?

The Proposed Project is within 2 miles of the Salton City Airport; however, implementation of the Proposed Project would not result in people permanently residing in the area. Following construction, no permanent workers would be located on site and work in the area would be consist of farming activities; the Proposed Project does not involve housing. As such, the project will not result in exposure to a safety hazard or excessive noise from proximity to the Salton City Airport. No impact would occur.

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

The construction of the Proposed Project would not involve blocking or restricting any access routes. The Proposed Project would not interfere with emergency response plans or operations near the irrigation well. No impacts are expected.

- g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

The potential for a wildfire in the unincorporated areas of the County is generally low¹⁹ and the irrigation well

¹⁸ (Department of Toxic Substance Control)

¹⁹ (County of Imperial)

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are not located within a fire hazard severity zone.²⁰ The Proposed Project would not introduce features that directly or indirectly increase the risk of wildfire throughout the Proposed Project area. No impact would occur.

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 known or reasonably expected surface water quality issues are anticipated to result from implementation of the Proposed Project; however, because ground-disturbing activities will occur in an area greater than one acre, a SWPPP will be developed that implements BMPs (as previously discussed) that sufficiently control degradation of water quality on site and adjacent to a drill pad or access road. In addition, the SWPPP will be implemented such that stormwater discharges would not adversely impact human health or the environment, nor contribute to any exceedances of any applicable water quality standard contained in the Basin Plan (Colorado River Basin Regional Water Quality Control Board).²¹ This impact is less than significant.

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

Construction of the well associated with the Proposed Project would require approximately 50,000 gallons of water per day; however, the use of water would be temporary in nature (30 days per proposed well site), and water necessary for these activities would be purchased from the Coachella Valley Water District via a fire hydrant. The proposed well would not result in a decrease in groundwater supplies and would not interfere with groundwater recharge; therefore, the Proposed Project would result in less than significant impacts associated with groundwater depletion.

The Proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Proposed Project may impede sustainable groundwater management of the basin.

Based upon an approximate flow of 125 gpm per well, additional drawdown on neighboring wells would be less than 2 ft outside of a 10,000-ft radius of a proposed airport supply well. The nearest neighboring water well identified is about 4,800 ft away and inactive. The next closest neighboring wells identified (to the north) are more than 10,000 ft away. Most of the neighboring wells are also likely inactive, as a field reconnaissance in December of 2015 found only old Salton City wells northwest of the landfill. Currently the area is part of the Coachella Valley Water District and all water is piped south to Salton City from the Coachella Valley in Riverside County.²²

²⁰ (CalFire)

²¹ (Colorado River Basin Regional Water Quality Control Board)

²² *Ibid*

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Given the depth of the West Salton Sea Basin, it is likely that a well drilled sufficiently deep at the proposed location west of the hangar at the airport should intersect multiple higher-permeability units and apparent transmissivity could increase with well depth. According to literature review, two existing wells in the immediate area show yielding more than double the required amount. Further, extrapolation of existing data for the Burrtec Landfill Well 1 suggest the required rate of 125 gpm could be achieved with about 875 ft of drawdown in a similarly completed well. A well depth of about 1,200 ft bgl, with an adequate length of screen, is recommended to accommodate such a large amount of drawdown.²³

If more than one well is completed, the wells would need to be over 3,000 ft apart to keep interference effect below 10 ft of drawdown. Any additional well installations would need to be spaced as far apart as possible on the approximately 320-acre airport property.

Maximum projected drawdown (decline) is project at less than 2 ft at a distance of 10,000 ft from the airport after 20 years of pumping for a range of transmissivities, including the 25 ft²/day for the Burrtec Landfill Well 1 documented at the landfill.²⁴

Based on the above findings, the Proposed Project would result in a less than significant impact to and groundwater supply and recharge rate, nor would the Proposed Project impede sustainable management of the West Salton Sea Basin.

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

(i) result in substantial erosion or siltation on- or off-site;

The Proposed Project would not result in substantial erosion, or siltation, on- or off-site. The Proposed Project would void existing drainages and ephemeral. No areas of landslide or increased erosion occur on site. The Proposed Project would be developed consistent with existing terrain, and areas used for farming would be maintained at a relatively flat grade. Therefore, the Proposed Project would not result in substantial on- or off-site erosion. Impacts would be less than significant.

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

The Proposed Project would not convert pervious soil into impervious surface. The Proposed Project involves conversion of the existing undeveloped land into farm use. The Proposed Project would avoid impacts to existing drainages and ephemeral washes. Topography would be maintained at a relatively flat grade, consistent with present conditions, and would not contribute to surface runoff in a manner which results in on-

²³ *Ibid*

²⁴ *Ibid*

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or off-site flooding. Impacts would remain less than significant.

- (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; or;
- | | | | |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|-------------------------------------|--------------------------|

The Proposed Project would not convert pervious soil into impervious surface. The Proposed Project involves conversion of the existing undeveloped land into farm use. The Proposed Project would avoid impacts to existing drainages and ephemeral washes. Topography would be maintained at a relatively flat grade, consistent with present conditions. Irrigation will be contained on site. Site runoff will not occur. Therefore, the Proposed Project would not contribute to runoff water or exceed the capacity of existing or planned stormwater drainage systems. The Proposed Project would not involve sources of runoff. Impacts would remain less than significant.

- (iv) impede or redirect flood flows?
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

The Proposed Project would not impact flood flows. No work would occur within regulatory floodways or ephemeral washes or watercourses. The Federal Emergency Management Administration identifies two regulatory floodways on the project site.²⁵ The regulatory floodway feature a low (1% risk) of flooding, and further, the Proposed Project would avoid impacts to these features. The Proposed Project would not impede or redirect flood flows; no impacts would occur.

- d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?
- | | | | |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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The Proposed Project is not located in an area at risk of tsunami or seiche.²⁶ No impact would occur.

- e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

The Proposed Project and associated well would be compliant with all city, state, and federal regulations, including compliance with the NPDES permits with the implementation of BMPs; compliance with the referenced regulations would reduce any potential impact associated with a water quality control plan to a less than significant. Additionally, as discussed above, implementation of the Proposed Project would not require water supplies beyond the supplies purchased from Coachella Valley Water District.

Further, the Proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The proposed commercial irrigation well would be constructed consistent with applicable guidelines and regulations. Therefore, the Proposed Project would remain

²⁵ (Federal Emergency Management Administration)

²⁶ (County of Imperial)

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consistent with the Imperial Integrated Regional Water Management Plan.²⁷ No impact would occur.

XI. LAND USE AND PLANNING

Would the project:

- a) Physically divide an established community?

The Proposed Project includes the construction of a commercial irrigation well and conversion of approximately 250-acres of undeveloped desert land to commercial farm use. The Proposed Project would not physically divide an established community, as no facilities are proposed that would prohibit travel throughout the Proposed Project area. The Proposed Project would not physically divide or block residents from accessing public areas or facilities. Land use designations would remain the same. No impact would occur.

- b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Plans exist have been adopted for the Salton Sea Airport.²⁸ The Proposed Project is not in conflict with the County adopted land use plans or policies. It is consistent with the County's General Plan, the Renewable Energy and Transmission Element Update, and the applicable sections of the Imperial County Land Use Ordinance (Title 9); therefore, no impact would occur.

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?

A number of mineral resources in Imperial County are currently being extracted, including gold, gypsum, sand, gravel, lime, clay, stone, kyanite, limestone, sericite, mica, tuff, salt, potash, and manganese. Several issues influence the extraction of mineral deposits in Imperial County, including the location of geologic deposition, the potential for impacts to the environment, and land use conflicts. As a result, the extraction of mineral resources is limited to a relatively small number of sites throughout the County.

The Proposed Project would not result in any impacts to known mineral resources or mineral resource recovery sites. Additionally, the Proposed Project would not preclude future mineral resource exploration throughout the Proposed Project area. No impacts would occur.

²⁷ (Imperial Irrigation District)

²⁸ (Imperial County)

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- 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?

The Proposed Project would not result in any impacts to known mineral resources or mineral resource recovery sites. Additionally, the Proposed Project would not preclude future mineral resource exploration throughout the Proposed Project area. No impacts would occur.

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?

Environmental Setting

The Proposed Project is located on the southwest side of Salton City, which is an unincorporated area located in the western portion of Imperial County. The primary sources of noise within the study area consists of vehicle noise on State Route 86 and the local roads, aircraft noise from Salton Sea Airport (Airport), and from off-road equipment operating at the Salton City Landfill. It should be noted that due to the distances these sources are located from the Proposed Project, these noise sources only provide nominal increases to the very low ambient noise levels at the proposed irrigation well site.

The nearest sensitive noise receptor consists of single-family residence, approximately 1,300 feet northeast at Air Park Drive.

County of Imperial Noise Standards

The General Plan Noise Element provides the applicable noise standards for the Proposed project.²⁹ The Noise Element limits the noise level from any noise generating property to 50 dBA between 7 a.m. and 10 p.m. and to 45 dBA between 10 p.m. and 7 a.m. at the property line of the nearest home. The Noise Element exempts construction noise from these standards, provided construction activities.

Noise at the Site may temporarily increase as a result of project construction. Working hours are anticipated to be 8 to 12 hours per day beginning in the morning hours and per the contractor's direction. In accordance with the General Plan, construction equipment operation will be limited to the hours of 7 am to 7pm Monday through Friday and 9 am to 5pm on Saturday, in compliance with the County General Plan noise ordinance. Temporary increases may result from traffic to the site and operation of construction equipment. Equipment

²⁹ (County of Imperial)

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used for construction will include but are not limited to the following: motor graders, soil compactors, front-end loaders, bulldozers, and skid steers.

Noise levels will be maintained as outlined in the Imperial County General Plan Noise Element.³⁰ The General Plan Noise Element exempts construction activities from the applicable noise standards, provided that construction activities are limited to between 7 a.m. and 7 p.m. Monday thru Friday and between 9 a.m. and 5 p.m. on Saturday and do not exceed 75 dBA Leq at the nearby residences. Construction of the irrigation well and farm, and farming operations would adhere to the allowable times for construction activities as detailed in the General Plan.

The County of Imperial permits operation of properly conducted agricultural operations within the County. In addition, the Proposed Project would comply with County Ordinance (1031), which serves as recognition to agricultural practices to new development. Agricultural/Industrial operations shall comply with the noise levels prescribed under the General Industrial Zones. Noise levels will be maintained as outlined in the Imperial County General Plan Noise Element. Impacts would be less than significant.

- b) Generation of excessive ground borne vibration or ground borne noise levels?

The County of Imperial permits operation of properly conducted agricultural operations within the County. In addition, the Proposed Project would comply with Imperial County Right to Farm Ordinance (1031). Agricultural/Industrial operations shall comply with the noise levels prescribed under the General Industrial Zones. Noise levels will be maintained as outlined in the Imperial County General Plan Noise Element. In addition, no sensitive noise receptors are located near the site. Impacts would be less than significant. The Proposed Project would not involve excessive ground borne vibration or ground borne noise levels. Impacts would remain less than significant.

- 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?

The Proposed Project site surrounds the Salton Sea Airport, located as near as 400 feet from the runway for Salton Sea Airport. The Noise Element of the General Plan (Imperial County, 2015) states that current airport activity at Salton Sea Airport is negligible and due to the low levels of activity. Therefore, the County did not prepare noise contours for Salton Sea Airport. Therefore, it is likely that Salton Sea Airport does not have activity to create 65-dBA CNEL noise contours. The Proposed Project would consist of a very limited increase in people working in the project area and the only source of airport noise is Salton Sea Airport that produces noise levels below County noise standards. As such, airport and airstrip noise impacts would be less than significant.

³⁰ (County of Imperial)

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XIV. POPULATION AND HOUSING

Would the project:

- a) Induce substantial unplanned 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)?

The Proposed Project would not induce unplanned population growth or displace existing people or housing. The Proposed Project consists of the installation of a commercial irrigation well and conversion of 250-acres into agricultural use within a predominantly undeveloped, vacant area of Imperial County. No residential units would require relocation, and access roads associated with the Proposed Project would be used only for accessing the Proposed Project. No development of new roads or infrastructure is proposed that would introduce new populations to the Proposed Project area. No impact would occur.

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

The project site is currently vacant. The Proposed Project does not involve the displacement of homes, businesses, or residents. No impact would occur.

XV. PUBLIC SERVICES

- a) Would the project 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, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- 1) Fire Protection?

The Proposed Project would not result in substantial adverse physical impacts to fire protection. The Proposed Project would not involve the modification of any fire protection services or their facilities. The survey also would not invite new populations to the area that would result in the permanent, and increased need of fire protection services. No impact would occur.

- 2) Police Protection?

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The Proposed Project would not result in substantial adverse physical impacts to fire protection. The Proposed Project would not involve the modification of any police protection services or their facilities. The survey also would not invite new populations to the area that would result in the permanent, and increased need of fire protection services. No impact would occur.

3) Schools?

The Proposed Project would not directly increase demand for public schools In the County. As a commercial water well and farming project, the Proposed Project would not generate employment that results in a substantial demand on school services. Indeed, the Proposed Project is only anticipated to have four employees when it is operational. The Proposed Project would not directly or indirectly induce any population growth in the Proposed Project area. Therefore, the Proposed Project would not increase demand on schools, nor degrade the quality of existing schools. No impacts would occur.

4) Parks?

The Proposed Project would not result in substantial adverse physical impacts to parks. The Proposed Project would not involve the modification of any parks or their facilities. Moreover, the Proposed Project would not invite new populations to the survey area that would result in the permanent and increased need for parks. No impact would occur.

5) Other Public Facilities?

The Proposed Project would not result in substantial adverse physical impacts to public facilities. The Proposed Project would not involve the modification of any public facilities. Moreover, the Proposed Project would not invite new populations to the survey area that would result in the permanent and increased need for parks. No impact would occur.

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?

Construction of the Proposed Project would not increase the use or demand for neighborhood parks, campgrounds, trails, or other recreational facilities and would not include the construction or expansion of new recreational facilities. The Proposed Project would not induce new populations that would result in the substantial physical deterioration of recreational facilities or require new facilities. No impact would occur.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse

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effect on the environment?

The Proposed Project would not include recreational facilities or require the construction or expansion of recreational facilities. The Proposed Project would not induce new populations that would result in the substantial physical deterioration of recreational facilities or require new facilities. No impact would occur.

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?

Primary highway access to the Project vicinity is provided by State Highway 86, a four-lane highway running north-south through Imperial County on the west side of the Salton Sea. Immediate access to the site is from an approximate 2-mile private access road between the Salton City Refuse Disposal State Highway 86. All existing nearby designated roads and trails would remain available for use. The Proposed Project would not affect transportation or pedestrian facilities. The Proposed Project would not cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system is negligible. Impacts would be less than significant.

- b) Would the project conflict or be inconsistent with the CEQA Guidelines section 15064.3, subdivision (b)?

Any increase in traffic would be short-term and temporary. Traffic volumes generated by construction and well drilling would be so minor, the potential for the Proposed Project to cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system is negligible. Approximately 4 workers would be present during construction of the proposed well. Additionally, Proposed Project operations would not appreciably increase vehicle miles travelled (VMT); traffic would only consist of routine transport of materials, and workers commuting to and from the site. Impacts would be less than significant.

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

The Proposed Project does not include any alteration to the existing public road network or involve incompatible use. This impact is less than significant.

- d) Result in inadequate emergency access?

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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The Proposed Project would not involve blocking or restricting any access routes. The Proposed Project would not interfere with emergency response plans or operations near the Proposed Project area. No impacts would occur.

XVIII. TRIBAL CULTURAL RESOURCES

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:

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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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 type="checkbox"/>
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The Proposed Project would not cause a substantial adverse change in the significance of a tribal cultural resource. Chambers Group submitted a request for a search of the Sacred Lands Files (SLF) housed at the California Native American Heritage Commission (NAHC) on January 5, 2023. The results of the search were returned on February 8, 2023, and were negative, stating that the absence of specific site information in the SLF does not indicate the absence of cultural resources in the project site that still may be impacted by Project development. In accordance with California Assembly Bill (AB) 52, Native American tribes with potential resources in the area were notified of the Project on January 18, 2023 and offered the opportunity for consultation. As of April 25, 2023, the Quechan Tribe has requested consultation. Consultation is ongoing and section will be updated pending results of consultation.

(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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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No significant impacts to cultural or paleontological resources are anticipated as a result of the current

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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undertaking if recommended eligible resources are avoided and the identified mitigation measures (MM-CR-1 through MM-CR-6) are implemented.

Consultation is ongoing and section will be updated pending completion of consultation.

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 stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?

The Proposed Project would not require the construction of any water, wastewater, stormwater, or energy facilities to accommodate the demands of the Proposed Project. No infrastructure would be required to provide water to the Proposed Project; water for dust control and drilling would be purchased from the Coachella Valley Water District. The Proposed Project would not generate wastewater that would need to be treated by a wastewater treatment facility. Storm water control would be implemented for each well pad and access road. The Proposed Project will be constructed so that no off-site discharge of water will be allowed, and all of the runoff or discharge will be managed on-site. The Proposed Project would not require additional water, electric, wastewater, natural gas, telecommunications facilities. Due to the lack of public utilities and services available within the Proposed Project area, and the lack of need to provide expanded services to accommodate the Proposed Project, these impacts are less than significant.

- b) Have sufficient water supplies available to serve the project from existing and reasonably foreseeable future development during normal, dry and multiple dry years?

Construction of the proposed irrigation well associated with the Proposed Project would not require a significant amount of water. Water use associated with the well would be limited to drilling and dust control measures. Water for dust control and drilling would be purchased from the Coachella Valley Water District via a nearby fire hydrant. Operation of the irrigation well would not require significant amount of water and would be limited to general maintenance activities.

While preparing the soil for crop production, water would be applied with a water truck that would be filled directly from the proposed well. The water well would be approximately 600-750 feet deep and would produce up to approximately 200 acre-feet per year (AFY) of water. Once crops are planted, a water delivery system of pipes, agricultural canals, and/or automated spray system fed by electric pumps would be utilized depending on the final crop selection. Any future crop would solely utilize water from the well and would not require any additional water beyond the 200 AFY.

Potable water for employees would be in the form of water bottles and/or the airport hangar facility which is serviced by Coachella Valley Water District domestic water supply. There are sufficient water supplies

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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available to serve the Proposed Project during normal, dry, and multiple dry years. This impact is less than significant.

- c) Result in a determination by the wastewater 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?

As noted in Impact b), the Proposed Project would not generate wastewater that would need to be treated by a wastewater treatment facility. Onsite wastewater needs will be accommodated by the use of portable toilets. No impact would occur.

- d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Small amounts of drilling mud and cuttings would be generated from drilling operations associated with the Proposed Project. These wastes would be temporarily stored in the onsite containment basin or tanks. The solid contents remaining in each containment basin, typically consisting of non-hazardous, non-toxic drilling mud and rock cuttings, will be tested as required by the CRWQCB. The solids will be removed and disposed of in a waste disposal facility authorized by the CRWQCB to receive and dispose of these materials. If allowed, they may be used as daily cover at the nearby landfill.

Further, all solid waste or trash created during the construction of the Proposed Project will be transported for disposal at an approved solid waste disposal facility. All survey debris, including flagging, stakes, and pin flags, will be gathered on cleared pathways daily and disposed of at an approved site or landfill. This impact is therefore less than significant.

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

Construction and operation of the Proposed Project would comply with all applicable statutes and regulations related to solid waste, as described above. Solid waste generated from the Proposed Project is expected to be minimal. This impact is less than significant.

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?

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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The Proposed Project is not within a high fire hazard severity zone.³¹ Proposed Project construction would not block or restrict emergency access routes. The Proposed Project would not impair an adopted emergency response plan or emergency evacuation plan. No impact is projected.

- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The Proposed Project would not involve development of structures of infrastructure that would introduce new populations to the Proposed Project area that could result in impacts involving wildfires. The survey would comply to the goals and policies identified in the County of Imperial General Plan Seismic and Public Safety Element to provide adequate safety measures to protect residents within the Proposed Project area. No impact would occur.

- 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?

The Proposed Project would not involve development of structures of infrastructure that would introduce new populations to the Proposed Project area that could result in impacts involving wildfires. No impact is projected.

- 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?

As noted above, the Proposed Project would not involve development of structures of infrastructure that would introduce new populations to the Proposed Project area that could result in impacts involving wildfires. No impact would occur.

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 substantially 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

³¹ (CalFire)

a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, eliminate tribal cultural resources or eliminate important examples of the major periods of California history or prehistory?

As identified in Section V of this IS, the Proposed Project has 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, and/or reduce the number or restrict the range of a rare or endangered plant or animal. However, the Proposed Project would implement measures MM-BR-1 through MM-BR-7 to reduce any potentially significant impacts to biological resources. Additionally, the Proposed Project was determined to result in potentially significant impacts associated with California history or prehistory. Implementation of MM-CR-1 through MM-CR-5, and MM-PR-1 through MM-PR-5 would reduce these impacts to less than significant. Therefore, the Proposed Project would result in less than significant impacts with mitigation 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.)
-

Implementation of the Proposed Project would not result in a cumulative impact. All potentially significant impacts can be reduced to less than significant via the implementation of mitigation measures. The cumulative impacts associated with the Proposed Project are less than significant.

- c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?
-

As noted above, all environmental impacts associated with implementation of the Proposed Project can be reduced to less than significant via implementation of mitigation measures. The Proposed Project would not result in significant impacts on human beings. This impact is less than significant.

IV. PERSONS AND ORGANIZATIONS CONSULTED

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

A. COUNTY OF IMPERIAL

- Jim Minnick, Director of Planning & Development Services
- Michael Abraham, AICP, Assistant Director of Planning & Development Services
- David Black, Project Planner
- Imperial County Air Pollution Control District
- Department of Public Works

- Fire Department
- Ag Commissioner
- Environmental Health Services
- Sheriff's Office

B. OTHER AGENCIES/ORGANIZATIONS

- _____
- _____

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

V. APPENDICES

Appendix A – Biological Resources Report and Jurisdictional Delineation
Appendix B – Archaeological Survey Report
Appendix C – Hydrogeological Report

VI. REFERENCES

- Brian F. Mooney & Associates. *County of Imperial General Plan EIR*. El Centro: Brian F. Mooney & Associates, 1993.
- CalFire. "State Responsibility Area Fire Hazard Safety Zones." CalFire, 21 November 2022.
- California Department of Conservation. 4 April 2023. <<https://maps.conservation.ca.gov/cgs/EQZApp/>>.
- . *California Important Farmland Finder*. 17 February 2023. <<https://maps.conservation.ca.gov/DLRP/CIFF/>>.
- California Department of Fish and Wildlife. *NCCP Plan Summary*. 4 April 2023. <wildlife.ca.gov/Conservation/Planning/NCCP/Plans/Imperial>.
- CalRecycle. *Organics*. 4 April 2023. <<https://calrecycle.ca.gov/organics/slcp/>>.
- Chambers Group, Inc. *Initial Study and Mitigated Negative Declaration*. Initial Study/Mitigated Negative Declaration. El Centro: Imperial County, 2019.
- Chambers Group, Inc. *Archaeological Survey Report for the Burrtec Commercial Well and Farming Project, Salton City, Imperial County, California*. San Diego: Chambers Group, Inc., 2023.
- . *Biological Resources Report for the Burrtec Commercial Water Well and Farm Project*. Santa Ana: Chambers Group, Inc., 2023.
- Colorado River Basin Regional Water Quality Control Board. *Water Quality Control Plan for the Colorado River Basin Region*. Palm Desert: Colorado River Basin Regional Water Quality Control Board, 2019.
- County of Imperial. "County of Imperial General Plan Geophysical and Public Safety Element." 1997. <http://www.icpds.com/CMS/Media/Geophysical-and-Public-Safety-Element.pdf>. 15 04 2023.
- . *Noise Element*. El Centro: Planning and Development Services, 2015.
- Department of Toxic Substance Control. *EnviroStor Databasse*. 2023. Available Online at: <http://www.envirostor.dtsc.ca.gov/public/>. 15 04 2023.
- Federal Emergency Management Administration. *FEMA's National Flood Hazard Layer (NFHL) Viewer*. 1 April 2023. <<https://hazards-fema.maps.arcgis.com/apps/webappviewer/>>.
- Imperial County Air Pollution Control District. *CEQA Air Quality Handbook*. El Centro, 2017. Available Online at

<https://www.co.imperial.ca.us/AirPollution/PlanningDocs/CEQAHandbk.pdf>.

—. "Rules and Regulations." <https://apcd.imperialcounty.org/rules-and-regulations/>. County of Imperial, 2020.

Imperial County. *Airport Land Use Compatibility Plan*. El Centro: Imperial County, 1996.

"Imperial County General Plan." *General Plan Open Space and Conservation Element*. 2016.

Imperial County. *Imperial County Planning and Development Services*. 17 March 2023.

<<https://www.icpds.com/planning/maps/flood-zone-maps>>.

Imperial County Planning and Development Department. *Renewable Energy and Transmission Element County of Imperial General Plan*. El Centro: County of Imperial, 2015.

Imperial County Planning and Development Services. "Imperial County Zone Maps Division 6 Airport Zoning." 2023.

Imperial Irrigation District. "Imperial Integrated Regional Water Management Plan." 2008.

John Shomaker & Associates, Inc. *Hydrogeological Technical Memorandum*. Albuquerque: JSAI, 2023.

United States Department of Labor, Occupational Safety and Health Administration. *Occupational Safety and Health Administration*. 1 April 2023. <<https://www.osha.gov/agricultural-operations/hazards>>.

Attachment C.
Application

CONDITIONAL USE PERMIT

I.C. PLANNING & DEVELOPMENT SERVICES DEPT.
801 Main Street, El Centro, CA 92243 (760) 482-4236

- APPLICANT MUST COMPLETE ALL NUMBERED (black) SPACES - Please type or print -

1. PROPERTY OWNER'S NAME Burrtec Waste Industries, Inc.	EMAIL ADDRESS dbrischke@burrtec.com	
2. MAILING ADDRESS (Street / P O Box, City, State) 9890 Cherry Avenue, Fontana CA	ZIP CODE 92335	PHONE NUMBER (909) 429-4200
3. APPLICANT'S NAME David Brischke	EMAIL ADDRESS dbrischke@burrtec.com	
4. MAILING ADDRESS (Street / P O Box, City, State) 9400 Cherry Avenue, Building C, Fontana, CA 92335	ZIP CODE 92335	PHONE NUMBER (909) 429-4200
4. ENGINEER'S NAME David S Brischke	CA. LICENSE NO. RCE No. C46521	EMAIL ADDRESS dbrischke@burrtec.com
5. MAILING ADDRESS (Street / P O Box, City, State) 9400 Cherry Avenue, Building C, Fontana, CA 92335	ZIP CODE 92335	PHONE NUMBER (909) 714-8146
6. ASSESSOR'S PARCEL NO. 017-970-009: 017-970-010: 017-970-011: 017-970-012	SIZE OF PROPERTY (in acres or square foot) 299.79 Acres	ZONING (existing) S1
7. PROPERTY (site) ADDRESS 1590 Air Crest Drive		
8. GENERAL LOCATION (i.e. city, town, cross street) Salton City		
9. LEGAL DESCRIPTION <u>See Attached Drawing Set, Sheet G03 - The parcels of land that combine to make the Salton City Airport</u>		

PLEASE PROVIDE CLEAR & CONCISE INFORMATION (ATTACH SEPARATE SHEET IF NEEDED)

10. DESCRIBE PROPOSED USE OF PROPERTY (list and describe in detail)	<u>Drilling & developing a large commercial water well to support farming activity on the unused portion of the Salton City airport property while keeping the airport functioning as permitted.</u>
11. DESCRIBE CURRENT USE OF PROPERTY	<u>Rural private airport surrounded by vacant and underutilized open desert</u>
12. DESCRIBE PROPOSED SEWER SYSTEM	<u>Sewer service to property provided by Salton Sea Community Services District</u>
13. DESCRIBE PROPOSED WATER SYSTEM	<u>Domestic water service provided by Coachella Valley Water District.</u>
14. DESCRIBE PROPOSED FIRE PROTECTION SYSTEM	<u>Imperial County Fire Department</u>
15. IS PROPOSED USE A BUSINESS? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	IF YES, HOW MANY EMPLOYEES WILL BE AT THIS SITE? <u>Estimated 2 to 4</u>

I / WE THE LEGAL OWNER (S) OF THE ABOVE PROPERTY CERTIFY THAT THE INFORMATION SHOWN OR STATED HEREIN IS TRUE AND CORRECT.

David S Brischke 07/23/2021
 Print Name Date
David Brischke
 Signature

 Print Name Date

 Signature

REQUIRED SUPPORT DOCUMENTS

A. SITE PLAN	_____
B. FEE	_____
C. OTHER	_____
D. OTHER	_____

APPLICATION RECEIVED BY: <u>DBK</u>	DATE <u>1/14/22</u>	REVIEW / APPROVAL BY OTHER DEPT'S required. <input type="checkbox"/> P. W. <input type="checkbox"/> E. H. S. <input type="checkbox"/> A. P. C. D. <input type="checkbox"/> O. E. S. <input type="checkbox"/> _____ <input type="checkbox"/> _____
APPLICATION DEEMED COMPLETE BY: <u>DB</u>	DATE <u>2/1/23</u>	
APPLICATION REJECTED BY: _____	DATE _____	
TENTATIVE HEARING BY: _____	DATE _____	
FINAL ACTION: <input type="checkbox"/> APPROVED <input type="checkbox"/> DENIED	DATE _____	

CUP #
22-0002

Attachment D.
Project Description

Salton City Airport Farm Project Description

Burrtec Waste Industries, Inc., wishes to construct a large commercial well approximately 25 feet west of the airport hangar building at the Salton City Airport. Water from the well will be used to support a planned farming operation on the unused lands around the runway and hangar building. All activities including crop selection will be managed in accordance with the guidelines and restrictions of Imperial County Airport Land Use Compatibility Plan as well as all other appropriate Federal, State and Local rules and regulations.

Preliminarily, the well will be completed as follows:

- 1) Total depth between 600 and 750 feet below ground surface.
- 2) Casing assumed to be 304 stainless with solid wall to 350 feet then screened to bottom.
- 3) 75 hp - 750 gpm vertical turbine pump, 480 volt/3ph
- 4) 8-inch diameter column pipe, 45 to 60 psi operating pressure

Salton City Airport consists of 6 adjoining separate parcels of land totaling approximately 300 acres. The Airport, which was first constructed in the late 1950's was constructed with a lighted main east/west runway 75 feet wide by 4,800 feet. Also constructed at the facility was a 3,000 square foot hangar and a 1,250 square foot office with restroom facilities. BWI purchased the Airport Property in a private land sale in 2010 and has operated and maintained the facility bringing the badly degraded runway surface, hangar and offices up to code for continued operation as a private airport. Air traffic in and out of the facility is very limited to periodic use by privately owned light aircraft and occasional rotary wing military aircraft from the regional training facilities that request use of the airport for practice maneuvers.

The runway and hangar/office facilities and the associated flight safety zones surrounding the runway account for approximately 50 acres of the property, leaving 250 acres undeveloped as open desert. BWI is proposing to convert the unused portion of the airport property to productive agricultural lands for growing of commercial crops. No specific crop has been selected at this time, however, it is anticipated that it may be a feed crop such as alfalfa.

The heavy clay ground will require addition of organics and amendments to support crop production. Organics may include composted green material, composted green/wood and food wastes, manures, dried Class A (EQ) biosolids along with gypsum and other common agronomic additives used to improve soil drainage and crop production and reduce water needs. Operations will be undertaken in compliance with the State Water Resource Control Board, Water Quality Order No. 2004-0012-DWQ, General Waste Discharge Requirements for the application of soil amendments to land in agriculture activities.

Best management practices such as cross-slope farming and diversion terraces will be employed to conserve soil and reduce erosion from rainfall runoff and winds as may be required by Imperial County. All activities including plowing and disking, soil amendment addition, planting and harvesting will be undertaken to promote "good neighbor" community relations consistent with the intent of Imperial County Agricultural Element including the County's Right-To-Farm Ordinance.