

CEQA Addendum/Findings
Analysis for the Salton Sea
Species Conservation Habitat
Project EIS/EIR



Document Information

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Acronyms

BLM	US Bureau of Land Management
CEQA	California Environmental Quality Act
CO _{2e}	carbon dioxide equivalent(s)
Corps	US Army Corps of Engineers
DDE	dichlorodiphenyldichloroethylene
DDT	dichlorodiphenyltrichloroethane
DOD	US Department of Defense
EDD	California Economic Development Department
EIS/EIR	Environmental Impact Statement/Environmental Impact Report
Fish & G. Code	California Fish and Game Code
FUDS	Formerly Used Defense Sites
GHG	greenhouse gas
ICAPCD	Imperial County Air Pollution Control District
IID	Imperial Irrigation District
NEPA	National Environmental Protection Act
NO _x	oxides of nitrogen
PEIR	Programmatic Environmental Impact Report
PM _{2.5}	particulate matter 2.5 microns in diameter or smaller
PM ₁₀	particulate matter 10 microns in diameter or smaller
SCAQMD	South Coast Air Quality Management District
SCH	Species Conservation Habitat
SR	State Route
SSERP	Salton Sea Ecosystem Restoration Program
SSMP	Salton Sea Management Program
SSTB	Salton Sea Test Base
UXO	unexploded ordinance

1 Introduction

This addendum updates the Salton Sea Species Conservation Habitat (SCH) Project Final Environmental Impact Statement/Environmental Impact Report (EIS/EIR) finalized in August 2013, to include the State's *Salton Sea Management Program - Phase I: 10-Year Plan* (10-Year Plan). The 10-Year Plan identifies a sequence of habitat and dust control projects around the perimeter of the Sea consistent with the SCH Project preferred alternative. The addition of these changes would not have any significant environmental impacts beyond those already addressed in the SCH EIS/EIR or cause a substantial increase in the severity of previously identified significant effects.

Under the California Environmental Quality Act (CEQA) Guideline section 15164, an addendum to a previously certified EIR is prepared if minor changes in the adopted project are proposed and none of the conditions in CEQA Guidelines section 15162 would occur.

As discussed in Section 1.3 of the SCH EIS/EIR (CEQA Project Goals and Objectives / NEPA Purpose and Need), the SCH Project's goals are two-fold: (1) develop a range of aquatic habitats that will support fish and wildlife species dependent on the Salton Sea; and (2) develop and refine information needed to successfully manage the SCH Project habitat through an adaptive management process.

The SCH Project is located at the mouth of the New River and encompasses dry playa that will be converted into aquatic habitat to support bird and fish populations at the Sea, and control dust emission from the playa.

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2 Project Description

This section describes the modifications to the SCH Project addressed in this addendum to conform the SCH Project to the California Natural Resources Agency's 10-Year Plan (SSMP 2017). These include additional locations and increased acreage for ponds and associated infrastructure, along with additional dust suppression measures located on exposed playa. The Phase 1 projects would be located along the southeastern portion of the Salton Sea near the New and Alamo Rivers, as well as at the northern end near the mouth of the Whitewater River. Details regarding the modifications are included in the 10-Year Plan, which is available online at <http://resources.ca.gov/salton-sea/salton-sea-management-program/>.

The Phase 1 project areas near the New and Alamo Rivers overlap a considerable area already evaluated in the EIS/EIR, and the remaining portions are immediately adjacent to the SCH Project alternative sites or along the northern perimeter of the Salton Sea near the Whitewater River in an area with similar environmental conditions (newly exposed playa adjacent to agricultural land). These locations are shown in the *Salton Sea Management Program Phase I: 10-Year Plan*, Appendix 1.

CNRA/DWR may also construct levees or berms in locations around the Salton Sea where there is opportunity to create and manage wetland habitat that will, over time, exhibit the range of salinity analyzed and approved in the final EIR.

The habitat projects would be concentrated in the 2018-2023 and the 2023-2028 playa exposure areas. Best Available Control Measures pilot projects and the water management ponds would be located in the 2003-2018 exposed area because they require exposed playa, and the water management ponds would be located as far up-gradient as possible to facilitate gravity flow. The water management ponds have the added benefit of suppressing dust from the exposed playa. A preliminary implementation schedule is included in the 10-Year Plan, Appendix 4.

Table 2-1 summarizes the projected playa exposure and the amount exposed emissive playa treated on an annual basis.

Table 2-1 2018-2028 Playa Exposure and Modified SCH Project Construction

Year	Exposed Playa (acres)	Proposed Construction (acres)
2018	3,500	500
2019	4,200	1,300
2020	5,000	1,700
2021	5,600	3,500
2022	5,500	1,750
2023	5,300	2,750
2024	4,900	2,700
2025	4,300	3,400
2026	3,900	4,000
2027	3,300	4,000
2028	2,800	4,200
Total	48,300	29,800

The location of habitat projects will be determined primarily based on site logistics such as water availability, soil suitability, and compatibility within the overall habitat landscape. If the primary objectives are met, location of habitat will be further informed by emissivity potential of the playa. Water-dependent dust suppression includes all water impoundment areas (both water management ponds and habitat), as well as vegetation enhancement techniques. The potential for seasonal flooding of some areas to provide habitat during migration and/or nesting seasons and then reducing water levels to keep the surface near saturation is being evaluated, as is salt crust formation.

Waterless dust suppression techniques include surface roughening, moat and row, gravel cover, and chemical suppressants/stabilizers. The techniques that would ultimately be used would be those with the fewest environmental impacts and least cost.

Sources of water for the modified SCH Project include the New, Alamo, and Whitewater Rivers, along with groundwater for use in the Torres Martinez wetlands.

3 Findings

No new significant impacts would occur as a result of the proposed project description changes, nor would the severity of previously identified significant effects increase substantially. While the scale of the project is being altered to include more of the perimeter of the lake, the scope and the impacts are not altered by this in any way. The impact numbers in the following sections (e.g., Impact AES-1) refer to those in the EIS/EIR.

3.1 Aesthetic Resources

No new impacts on aesthetic resources would occur from expanded pond construction. Similar types of construction activities would occur, using similar equipment, in similar environmental settings as described in the SCH Project EIS/EIR. Pond construction in the vicinity of the New and Alamo Rivers would overlap some of the alternative sites evaluated in the EIS/EIR or would be adjacent to these areas. The expanded areas, including near the Whitewater River along the northern portion of the Salton Sea, are adjacent to agricultural land, which is not considered visually sensitive, and is generally similar to the area near the New and Alamo Rivers. As described in the SCH Project EIS/EIR (**Impact AES-1**), construction impacts would be temporary and less than significant.

Impact AES-2 continues to be applicable because the new ponds and the birds they would attract would improve the overall visual qualities of the surrounding area, which would be a beneficial impact. As described under **Impact AES-3**, the small-scale facilities required to operate the ponds would be visually compatible with the surrounding agricultural areas, and impacts would be less than significant. **Impact AES-4** is not applicable to the modified SCH Project because construction would not occur at night; dredging equipment, which may operate up to 24 hours a day, would not be used to excavate the ponds. Therefore, no impacts associated with night lighting would occur.

The water-dependent air quality dust suppression measures would not result in any new significant impacts because they would include ponds, seasonal flooding or vegetation enhancement, which would not detract from the area's aesthetic resources, and may represent an improvement; and salt crust formation, which would be comparable to naturally occurring conditions. Waterless dust suppression techniques also would not result in significant impacts because they would not substantially degrade the visual character or quality of the sites where they would be used, which are not located in visually sensitive areas. No scenic resources or scenic vistas would be affected, nor would light and glare result from the implementation of the dust suppression measures.

Thus, the modified SCH Project would not result in new significant environmental effects on aesthetic resources or in a substantial increase in the severity of previously identified significant effects.

3.2 Agricultural Resources

Impact AG-1 is not applicable to the modifications because construction of the diversion and conveyance facilities along the New and Alamo Rivers would not result in permanent conversion of existing farmland to non-agricultural uses, and the water supply lines for the water management ponds at the Whitewater River would not cross land that is in active agricultural production. The water management ponds and supply canals at the New and Alamo Rivers would not be located on agricultural land or land under a Williamson Act contract. None of the Project sites near the Whitewater River are on lands that are under a Williamson Act contract. Approximately 21 acres of the water management ponds near the Whitewater River would be located on Farmland of Local Importance, as would approximately 3 acres associated with the northernmost water supply canal. Consistent with the discussion in **Impact AG-2**, this amount would be negligible when compared to the more than 200,000 acres of Farmland of Local Importance in

production in Riverside County (California Department of Conservation 2017), and impacts would be less than significant. Dust suppression techniques would be located on recently exposed playa and would not affect agricultural lands.

Thus, the modified SCH Project would not result in new significant environmental effects on agricultural resources or in a substantial increase in the severity of previously identified significant effects.

3.3 Air Quality

No new significant short or long-term air quality impacts would occur as a result of the modifications.

Impact AQ-1: Emissions from construction and maintenance are accounted for in applicable air quality plans, including those of the Imperial County Air Pollution Control District (ICAPCD) and the South Coast Air Quality Management District (SCAQMD), and would not conflict with or obstruct their implementation, even with modifications that include additional ponds and associated infrastructure. Because general estimated basinwide construction-related emissions are included in ICAPCD's and SCAQMD's emission inventories, and because all required emissions reduction measures would be implemented, construction activities would not prevent attainment or maintenance of state or federal ozone (O₃) or particulate matter standards within the Salton Sea Air Basin. The modified Project also would not increase population or vehicle miles traveled beyond projections in local plans. In addition, the modified Project would not result in the operation of any stationary emissions sources or long-term operation of area or mobile emission sources. Thus, any impacts would remain less than significant, as described in the EIS/EIR.

Impact AQ-2: As a result of the modifications, more exposed playa would be covered than would be exposed, reducing the potential for wind-blown fugitive dust. This beneficial result would be considerably greater than under the original Project because approximately 30,000 acres of exposed playa would be covered with either ponds or other dust suppression methods, as opposed to a maximum of approximately 3,770 acres under Alternative 3.

Impact AQ-3a: The additional modifications would contribute incrementally to violations of federal and state O₃, PM₁₀, and PM_{2.5} standards and exceed ICAPCD's daily NO_x and PM₁₀ thresholds during construction, but all existing air quality mitigation measures would be implemented, which would reduce this impact to the same degree regardless of Project scale. It is also possible that the SCAQMD's NO_x and PM₁₀ thresholds would be exceeded during construction, as well, as a result of construction near the Whitewater River. As discussed in the EIS/EIR, this would be a significant and unavoidable impact, and this conclusion would not be affected by the changes to the Project description. Although the total emissions would be greater than those described in the EIS/EIR, the daily emissions, which are the basis for the significance determination, would be spread out over a longer period of time (10 years as opposed to 2 years), and they would be distributed between the north and south ends of the Salton Sea and subject to the thresholds of two air districts. Thus, the increase in daily emissions would not represent a substantial increase in the severity of a previously identified significant effect, nor would the overall total emissions represent a significant increase.

The modified SCH Project would be required to comply with ICAPCD's Regulation VIII, Fugitive Dust Control Measures (Appendix G), as discussed in the EIS/EIR, as well as the SCAQMD's Rule 403, Fugitive Dust. In addition to those measures that are required for all projects by the ICAPCD and SCAQMD, **MM AQ-1** and **MM AQ-2**, described in the EIS/EIR, would be implemented to further minimize impacts from NO_x and PM₁₀ emissions, thus rendering the changes consistent with the original Project.

Impact AQ-4: Routine maintenance and associated vehicular traffic would not exceed ICAPCD's or SCAQMD's thresholds even with the modifications to the Project. Periodic maintenance of the dust suppression techniques, primarily the waterless techniques, would generate emissions, as well. As shown in Table 3.3-1, the operational emissions for SCH Alternative 3, which was the largest alternative evaluated in the EIS/EIR, would be well under the daily operational thresholds established by both the

ICAPCD and SCAQMD. Operational emissions from the modified SCH Project would occur in two different air districts. NO_x emissions come the closest to approaching the thresholds, but to exceed the NO_x thresholds, more than 2.6 times the daily emissions would need to be generated in either the ICAPCD or SCAQMD. This would not occur because maintenance would take place intermittently over time, and there is not a direct, proportionate link between the amount of acreage that would be included in the modified SCH Project and the amount of maintenance that would occur on a daily basis. Thus, this impact would continue to be less than significant.

Table 3.3-1 Emissions Significance Thresholds for Operations (lbs/day)

Criteria Pollutant	ICAPCD	SCAQMD	SCH Alternative 3
Volatile Organic Compounds (VOCs as methane [CH ₄])	55	55	2.4
Carbon Monoxide (CO)	550	550	8.9
Oxides of Nitrogen (NO _x as NO ₂)	55	55	20.5
Sulfur Dioxide (SO _x as SO ₂)	150	150	0
Particulates (PM ₁₀)	150	150	0.8
Particulates (PM _{2.5})	–	55	0.7
Lead	–	3	NA

Sources: ICAPCD 2007, SCAQMD 2015

Impact AQ-5: The EIS/EIR indicated that Project construction would result in a cumulatively considerable/significant net increase in emissions, which is a significant unavoidable impact, and this would not change or be cumulatively more considerable as a result of the Project modifications. The modified SCH Project would similarly result in a significant unavoidable impact should other projects be under construction at the same time. Emissions from operations and maintenance of the ponds and dust suppression measures would not be cumulatively considerable/significant because they would be mobile, intermittent, and minor, as discussed in the EIS/EIR.

Impact AQ-6: Project emissions from construction and maintenance would not expose sensitive receptors to substantial pollutant concentrations even with the modifications. As was the case with the original SCH Project alternatives, the modified Project sites are located in a sparsely populated agricultural area, and no houses, parks, schools, libraries, senior facilities, day care centers, or hospitals are located within 1,000 feet of the potential construction sites. Similarly, the access routes are in agricultural areas, although isolated farmhouses are present at some locations. Similar numbers of daily truck trips are expected to occur during construction, although they would be spread out over a 10-year period instead of a 2-year period. As described in the EIS/EIR, the access roads are very lightly traveled, and the addition of intermittent trips during construction would not expose sensitive receptors to health risks. Therefore, due to relatively low mass emissions, dispersion over a wide geographic area, lack of proximate receptors, and intermittent occurrence, impacts from construction and maintenance would continue to be less than significant. Additionally, implementation of the control measures for diesel exhaust described in **MM AQ-1** and **MM AQ-3** would further reduce any potential impacts associated with diesel particulate matter.

Impact AQ-7: As discussed in the EIS/EIR, the Project could result in localized odors during construction, operations, and maintenance, and this would continue to be a less than significant impact with the proposed modifications because the same types of fuels would be used; odors from anoxic sediments, should they occur, would dissipate rapidly; fish and bird die-offs would be monitored and dealt with as described in the EIS/EIR; and the expanded sites would be located in sparsely populated areas.

Impact AQ-8: Modifications to the SCH Project would continue to have a minor effect on the microclimate near the Salton Sea, which would be a less than significant impact. The modified SCH Project would temper the changes to a larger extent than the original Project because it would replace a greater portion of what otherwise would be exposed playa with water-filled ponds.

No new significant air quality impacts would occur as a result of the proposed modifications to the SCH Project, nor would a substantial increase in the severity of previously identified significant effects occur. The modifications would have a greater beneficial impact with regard to dust suppression because more exposed playa would be covered than under the original SCH Project.

3.4 Biological Resources

Impacts BIO-1a, BIO-1b, and BIO-1c: No new or more severe impacts on biological resources would occur as a result of the modifications. Similar construction and operational practices would be implemented to create the habitat ponds and associated infrastructure in similar geographic areas. The same special-status bird species would be present, as well, and would be similarly affected by construction and operation of the expanded ponds as described in the EIS/EIR, although more individuals would be affected. No special-status species are present in the expanded area that were not already discussed in the EIS/EIR (CNDDDB 2017). The same mitigation measures would be implemented (**MM BIO-1, MM BIO-2, MM BIO-3, and MM BIO-4**), which would reduce impacts on desert pupfish (*Cyprinodon macularius*) and special-status bird species to less than significant because impacts would be avoided or minimized.

Project operation would continue to provide habitat for desert pupfish and several special-status bird species after the Salton Sea exceeds their water quality tolerances. This would be a beneficial impact, and the benefits would be greater than under the SCH Project because more habitat would be provided. Implementation of the dust control measures would not affect desert pupfish because it would not affect the Salton Sea and the drains where they are located. The same birds described in the EIS/EIR could be affected by ground disturbance from construction and maintenance activities associated with the dust suppression methods to the extent that construction occurred in the appropriate habitat. No future exposed playa lands will have avian habitat that is not readily available in large quantities around the Salton Sea; therefore, no new impacts on terrestrial birds would result from the implementation of dust suppression construction actions by the modified Project. Impacts would not exceed those identified in the EIS/EIR, and some measures, such as vegetation enhancement as a dust suppression measure, potentially could be beneficial to many avian species at the Sea. The use of chemical suppressants and stabilizers would be limited to those that could be used without adversely affecting local wildlife.

Impact BIO-2: Construction and operation of the ponds and associated infrastructure would continue to cause a temporary disturbance or loss of riparian habitat and/or sensitive habitat. This would be a significant impact, but would not be substantially more severe as a result of the proposed modifications. The area of impact would be expanded to include the Whitewater River sites, but the impacts would be similar, and the same mitigation measure (**MM BIO-5**) would be implemented, which would reduce the impact to less than significant. The dust suppression measures would not affect riparian or other sensitive habitat because they would be implemented on recently exposed playa.

Impacts BIO-3a and BIO-3b: As stated in the EIS/EIR, the construction of the ponds and associated infrastructure would result in temporary disturbance of Federal Waters of the US and minimal effects on wetlands, which would be a less than significant impact, and this would not change with the proposed modifications. Diversion of water for the enhanced habitat ponds at the northern end of the Salton Sea would occur along the Whitewater River or through development of groundwater wells to supply the ponds, but impacts would be similar to those for the New and Alamo Rivers because similar conditions are present; the Whitewater River is characterized by cattail-dominated wetlands in a low-flow channel and adjacent willow (*Salix* sp.), cottonwood (*Populus fremontii*), salt cedar, and arrow weed (*Pluchea*

sericea) (Amec Foster Wheeler 2016). Overall, the modified SCH Project would have a greater net increase in Waters of the US because more acres of ponds would be constructed. Implementation of the other dust suppression measures would not affect Waters of the US or wetlands.

Impact BIO-4: Aquatic species would not be adversely affected by construction and operation of the modified Project (desert pupfish are addressed under **Impact BIO-1**). No migratory fish are present, and construction of the ponds and diversion structure would not interfere with movement of the nonnative aquatic species in the Salton Sea and New, Alamo, and Whitewater Rivers. Impacts on aquatic species movement would remain less than significant. Development of pond habitat around the Sea is designed to support populations of targeted fish species and therefore would have a beneficial impact on fish populations at the Sea. Potential impacts associated with the removal of snags would be as described in the EIS/EIR because similar conditions would be present. Implementation of dust suppression measures would not affect the movement of fish or aquatic species or the presence of snags.

Impact BIO-5a: As was the case with the original Project, Project modifications could affect nesting by some common bird species unless mitigation measures are implemented. Similarly, absent mitigation, invasive species could be introduced, spread, or otherwise established during construction or operations of the modified project. However, the proposed modifications would follow all mitigation requirements as originally proposed. During construction of any new habitat, contractors would implement mitigation measures **MM BIO-2**, **MM BIO-3**, and **MM BIO-6**. As described in the EIS/EIR, with implementation of **MM BIO-2** and **MM BIO-3**, residual impacts would be less than significant because disturbance of nesting birds would be avoided. Implementation of **MM BIO-6** would reduce residual impacts of invasive species to less than significant by minimizing the potential for introduction of such species.

Impact BIO-5b: No new significant effects on common fish (native and nonnative), wildlife species, or native plant communities would occur as a result of the proposed Project modifications. Impacts associated with selenium would be as described in the EIS/EIR for habitat ponds located along the New and Alamo Rivers. Selenium levels are lower in the Whitewater River, so ecorisk impacts would be less than described in the EIS/EIR (EIS/EIR Table 3.11-5; SWAMP 2016). All three rivers have known problems with pesticides, and impacts would be similar to those described in the EIS/EIR. Impacts associated with avian diseases and fish die-offs would be similar to those described in the EIS/EIR because the habitat ponds would be designed and operated in a similar manner as the original SCH Project. Implementation of the dust control measures would not affect fish or native plant communities because they would be located on recently exposed playa. Construction and maintenance of these measures could result in temporary disturbances to terrestrial wildlife habitats through ground disturbance and noise, but individuals of most species would move out of the disturbance area so that few individuals would be directly affected, as described in the EIS/EIR.

Impact BIO-5c: Adding aquatic and terrestrial habitat acreage to the Project would result in a beneficial impact on common fish and wildlife species, both native and nonnative. This beneficial impact would be greater than under the original SCH Project because more habitat would be restored. The dust control measures would not affect fish.

The water management ponds and supply canals near the Whitewater River are within the boundaries of the Coachella Valley Multiple Species Habitat Conservation Plan (CVMC 2007) and are part of the Coachella Valley Stormwater Channel and Delta Conservation Area. This area contains Core Habitat for desert pupfish and crissal thrasher (*Toxostoma crissale*), and it protects one of the two known Habitat areas in the Plan Area for Yuma clapper rail (now known as Yuma Ridgway's rail [*Rallus obsoletus yumanensis*]) and California black rail (*Laterallus jamaicensis coturniculus*). The area also contains suitable migration and breeding habitat for the riparian species covered by the plan and also provides Other Conserved Habitat for Le Conte's thrasher (*Toxostoma lecontei*), Coachella Valley round-tailed ground squirrel (*Spermophilus tereticaudus* ssp. *chlorus*), and Palm Springs pocket mouse (*Perognathus*

longimembris bangsi). The conservation measures for this area are described below; each measure is followed by a description of the modified SCH's Project consistency with the measure:

1. In total, 3,870 acres of the Coachella Valley Stormwater Channel and Delta Conservation Area shall be conserved. (This may be less than the sum of acres indicated in the following objectives because there can be overlap among areas covered by the objectives.) For example, Core Habitat for two or more species may overlap, or Core Habitat and an Essential Ecological Process area may overlap. The individual acreage figures will be used in compliance monitoring.
 - > The water management ponds and supply canals near the Whitewater River would not impact the Conservation Area. The water management ponds and supply canals would comprise approximately 450 acres, and the ponds could be used as fish habitat. In addition, the Torres Martinez wetlands project (50 acres), which is part of the modified SCH Project but which has undergone separate environmental review, would create wetlands that could provide habitat for some of the MSHCP's Covered Species.
2. Conserve at least 781 acres of Core Habitat for *Crissal thrasher*, allowing evolutionary processes and natural population fluctuations to occur. Minimize fragmentation, human-caused disturbance, and edge effects to Core Habitat by conserving contiguous Habitat patches and effective Linkages between patches of Core Habitat.
 - > The modified SCH Project would not conflict with this measure because this species is not currently known to be present in the areas where the water management ponds and supply canals would be located (CVMC 2007, Figure 4-25b; Amec Foster Wheeler 2016). The Torres Martinez ponds would, however, create wetlands that may provide habitat for a variety of freshwater marsh and riparian birds, such as crissal thrasher, which would support the goals of the MSHCP.
3. Conserve at least 706 acres of Other Conserved Habitat for Le Conte's thrasher.
 - > The modified SCH Project would not conflict with this measure because this species is not currently known to be present in the areas where the water management ponds and supply canals would be located (CVMC 2007, Figure 4-25b; Amec Foster Wheeler 2016).
4. Establish 66 acres of permanent Habitat for California black rail and Yuma clapper rail (Yuma Ridgway's rail) in this area to replace the Habitat that is periodically altered by flood control and drain maintenance activities. Surveys area required in potential Habitat for the rails before any activity that would impact the Habitat. If rails are found, the Habitat must be avoided or measures approved by the wildlife agencies taken to ensure that no take of an individual occurs, other than for project where Fish and G. Code § 2081-7 is applicable.
 - > The modified SCH Project may provide suitable habitat for California black rail, but this species is not known in the immediate region. Suitable habitat for Yuma clapper rail/Yuma Ridgway's rail is known in the Project area, near the mouth of the Whitewater River (Amec Foster Wheeler 2016). Regardless, the modified SCH Project would not conflict with plans to conserve areas for these species. As discussed in MM BIO-5, modified SCH Project would include preparation and implementation of a Habitat Protection, Mitigation, and Restoration Program, whereby impacts on sensitive and riparian habitat would be avoided or offset by restoration. MM BIO-2, MM BIO-3, and MM BIO-4 include measures that would reduce impacts on special-status species covered by the plan to less than significant, consistent with the goals of the MSHCP.
5. Establish permanent riparian Habitat including at least 44 acres of Sonoran cottonwood-willow riparian forest in this area to replace the Habitat that is periodically altered by flood control maintenance activities.
 - > The modified SCH Project would not conflict this this measure.

6. Restore and enhance wetlands Habitat as feasible.
 - > The Torres Martinez ponds would create wetlands, consistent with this measure.
7. Conserve occupied burrowing owl (*Athene cunicularia*) burrows as described in burrowing owl avoidance, minimization, and mitigation measures.
 - > MM BIO-2 would ensure that any impacts on burrowing owls would be mitigated consistent with the MSHCP measures.
8. Establish 25 acres of permanent replacement Habitat for desert pupfish and maintain a desert pupfish population in the agricultural drains.
 - > The modified SCH Project would increase the amount of habitat for desert pupfish than would otherwise exist, including in areas near the Coachella Valley Stormwater Channel and Delta Conservation Area and includes a mitigation measure to protect desert pupfish during construction
9. Conserve at least 67 acres of mesquite hummocks, at least 713 acres of the desert saltbush scrub, at least 1,026 acres of desert sink scrub, and at least 51 acres of coastal and valley freshwater marsh natural communities, which provide Habitat for riparian birds and other Covered Species. For the remaining acreage of the coastal and valley freshwater marsh natural community where disturbance is authorized by the Plan, ensure no net loss.
 - > The modified SCH Project would not conflict with efforts to conserve the habitat types listed above; as discussed under Measures 1 and 2, the Torres Martinez Project would create wetlands. The eastern pond is located in an area classified as desert sink scrub in the MSHCP, but this would represent a small portion of the total acreage to be conserved and would be necessary to allow the creation of habitat ponds that could support desert pupfish, one of the MSHCP's Covered Species.
10. Remove tamarisk to improve Habitat values.
 - > The modified SCH Project would not conflict with efforts to remove tamarisk. MM BIO-5 gives the option of restoring sensitive or riparian habitats with either native or nonnative species, consistent with permit conditions. Additionally, the salinity level in the managed ponds will prevent the proliferation of tamarisk (*Tamarix* spp.).

In summary, the modified SCH Project would be consistent with the conservation measures established for the Coachella Valley Stormwater Channel and Delta Conservation Area. No new significant impacts on biological resources would occur as a result of the proposed modifications to the SCH Project, nor would a substantial increase in the severity of previously identified significant effects occur. The modifications would have a greater beneficial long-term impact because more habitat would be created than under the original SCH Project.

3.5 Cultural Resources

Impact CR-1: Consistent with the conditions described in the EIS/EIR, facilities associated with the modified SCH Project, including both the habitat ponds and infrastructure and dust suppression sites, would be located in an archaeologically sensitive area, and construction activities could encounter cultural resources or human remains associated with the area's historical occupation by both Native Americans and Euro Americans. Mitigation Measure **MM CR-1** would be applicable to the modified SCH Project and would reduce any potential impacts to less than significant for the same reasons described in the EIS/EIR. No new significant cultural resources impacts would occur as a result of the proposed modifications to the SCH Project, nor would a substantial increase in the severity of previously identified significant effects occur.

3.6 Energy Consumption

There would be no new significant, or more severe impacts to energy consumption as a result of pumping additional seawater to supply habitat ponds. As described in the EIS/EIR, the seawater pump would lose efficiency over time because of the hypersaline water being pumped, but would be maintained as appropriate to reduce fouling and would be replaced when needed. The river pumps also would be maintained appropriately and replaced when needed. Implementation of the air quality mitigation measures would require minimal amounts of energy, primarily from groundwater pumping should this water source be used at the northern end of the Salton Sea, and solar power would be used to operate this pump. Therefore, the modified SCH Project would not use energy in an inefficient or wasteful manner. No new significant energy consumption impacts would occur as a result of the proposed modifications to the SCH Project, nor would a substantial increase in the severity of previously identified significant effects occur.

3.7 Geology and Soils

There would be no new or more severe impacts on geology or soils. **Impacts GEO-1, GEO-2, and GEO-3** are applicable to the modified SCH Project because similar types of pond construction would occur in areas with similar geologic conditions. The same types of best management practices would be used to prevent soil erosion and the loss of topsoil during construction, ensuring that impacts would be less than significant, as described the EIS/EIR. The other dust suppression techniques would not result in any risks to the public, and would prevent erosion of the exposed playa, which would be a beneficial impact.

Impact GEO-4: Proposed modifications would require rock or gravel from local sources to be used as substrate or riprap for the ponds, as described in the EIS/EIR, or for use as a waterless dust suppression technique. No new or more significant impacts would result from this additional application of rock associated with the modified project. More of these materials would be required due the larger acreage involved, but they are in ready supply, and their use would not result in the loss of availability of a mineral resource that is of local or statewide importance.

No new significant impacts on geological resources would occur as a result of the proposed modifications to the SCH Project, nor would a substantial increase in the severity of previously identified significant effects occur.

3.8 Greenhouse Gas Emissions

Impact GHG-1: The proposed modifications would generate minor amounts of GHG emissions during construction and operations of the ponds and associated infrastructure and the dust suppression measures, and any impacts would be less than significant. As discussed in the EIS/EIR, construction of the original SCH Project would generate up to approximately 6,650 metric tons of carbon dioxide equivalents (CO₂e) over the course of 2 years. Using a linear scale to estimate emissions from construction of approximately 30,000 acres (it is assumed that on average, dust suppression methods would not exceed those of pond construction), the modified SCH Project would generate a total of approximately 54,000 metric tons of CO₂e over the course of 10 years, or approximately 5,400 metric tons of CO₂e per year. As described in the EIS/EIR, these emissions would be temporary and would cease upon completion of work. Moreover, they would be well under the amount of GHG emissions that major facilities are required to report (25,000 metric tons of CO₂e or more per year).

As described in the EIS/EIR, the primary power demand during operations could result from pumping, and electric pumps were chosen over diesel to minimize air emissions. Alternative methods of diverting river water relying on gravity are under consideration, though, which would reduce emissions. However, should electric pumps be used, indirect GHG emissions from the fossil fuel component of mixed electric power generation would increase as a result of the modified Project. Indirect GHG emissions from electric power used by the pumping plants for the original SCH Project would be about 2,280 metric tons of CO₂e

annually. Estimating emissions based on the proportional increase in acreage would equal 18,143 metric tons CO₂e annually. Power required to operate the Project pumps would increasingly come from sources that minimized the production of GHG emissions, and indirect emissions would be expected to decrease over time. Imperial Irrigation District's (IID's) current energy sources include ~36% (2015) non-carbon based and renewable energy sources (<http://www.iid.com/energy/renewable-energy/power-content-label>), which reduce the carbon footprint of electricity demand attributed to the modified project.

In addition to indirect emissions, direct GHG emissions from the original SCH Project from maintenance equipment and vehicles would be about 96 metric tons of CO₂e annually. Proportionally increasing this to reflect the increased acreage would result in 763 metric tons of CO₂e annually. Combined direct and average indirect operational emissions would be about 18,906 metric tons of CO₂e annually, which is under the annual 25,000 metric ton CO₂e reporting threshold established by Assembly Bill 32 but above the draft annual 7,000 metric ton CO₂e threshold suggested by the California Air Resources Board. This is not an adopted significance threshold, however, and the modified Project would continue to comply with best management practices that are intended to reduce GHG emissions during construction, operations, and maintenance to the extent feasible. (Refer to Section 2.4.7 of the SCH Project Draft EIS/EIR for a description of these practices.) Using these best management practices would contribute to energy efficiency.

Impact GHG-2: The proposed modifications would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions for the reasons described in the EIS/EIR, and impacts would remain less than significant.

No new significant impacts on GHG emissions would occur as a result of the proposed modifications to the SCH Project, nor would a substantial increase in the severity of previously identified significant effects occur.

3.9 Hazards and Hazardous Materials

Impacts HAZ-1, HAZ-2, HAZ-4, HAZ-5, and HAZ-6: Similar types of hazardous materials would be used during construction, operation, and maintenance, and similar best management practices would be implemented. Similar soil contaminants could be present, and similar testing and/or remediation procedures would be followed before construction as needed, and similar dust control measures would be implemented during construction. As described in the EIR/EIR, construction would take place in sparsely populated rural areas, and typical roadway safety precautions would be taken to ensure that traffic and construction near roadways would not impair the implementation of an adopted emergency response or evacuation plan. These impacts would all remain less than significant.

The same air and dust-borne disease-causing viruses could be present as described in the EIS/EIR, which would be a significant impact. **MM HAZ-1** would continue to be implemented and would reduce impacts to worker safety to less significant because workers would be trained how to recognize symptoms (and thus get treatment), as well as how to use personal protective equipment to prevent disease, as described in the EIS/EIR.

Impact HAZ-7: Project modifications could increase breeding habitat for mosquito vectors, but implementation of the Mosquito Control Plan would prevent threats to public health, as described in the EIS/EIR. Therefore, any impacts would remain less than significant.

Impact HAZ-8: Selenium and dichlorodiphenyldichloroethylene (DDE) are present in the pond source water and could cause increased selenium and DDE levels in sport fish and waterfowl using the ponds. However, these baseline concentrations pose less than significant impacts associated with human consumption. The modified project would not increase the levels of these constituents and therefore would not increase human health risk exposure related to consuming fish or wildlife from the ponds. This would be a less than significant impact as identified in the EIS/EIR. Impacts for ponds near the New and

Alamo Rivers would be as described in the EIS/EIR because the same source water would be used, and the ponds would be operated in the same way. The Whitewater River ponds also would be operated in a similar manner, but selenium levels are less than in the other rivers (EIS/EIR Table 3.11-5; SWAMP 2016), so the potential for impacts is less. The Coachella Valley Stormwater Channel (the portion of the Whitewater River leading into the Salton Sea) is listed as impaired for dichlorodiphenyltrichloroethane (DDT) on the State's 303(d) list (SWAMP 2016); therefore, impacts would be comparable to those for the sites near the New and Alamo Rivers as described in the EIS/EIR.

Other Potential Hazards

The potential risks from unexploded ordnance (UXO) were not addressed in detail in the SCH Project EIS/EIR because the Salton Sea Test Base (SSTB) and any Salton Sea fixed bomb target sites were outside the SCH Project boundaries. Portions of the modified SCH Project, however, do encroach into areas that were bomb targets. A portion of the Alamo River South playa that would be exposed in the 2023-2028 timeframe would overlap part of Bomb Target No. 51, and a portion of the Whitewater River playa that would be exposed in the same timeframe would overlap part of Bomb Target No. 54; this target also is immediately adjacent to the playa that would be exposed during the 2018-2023 timeframe (Parsons 2009).

The potential risks from UXO were addressed in the Salton Sea Ecosystem Restoration Program Programmatic Environmental Impact Report (PEIR) (Chapter 14). Bomb Target 51 is described as a "Practice bomb target. 11th Naval District discontinued use in 1945. Department of the Interior owned." Bomb Target 54 is described as "High-altitude and dive-bombing target. No details available." The PEIR noted that:

Most of the bombing targets were floating targets consisting of radar-rigged, wooden pyramid structures for high-altitude bombing and dive-bombing practice (USACE, 1996). One was a skip bomb target with a screened raft-radar for low-level practice bombing. A few targets shifted location over time due to the effects of weather and wind. Other sites were designated as safety areas near bomb targets to provide a buffer. Some sites were listed as "potential or proposed," and may not have been used for bombing practice. Typically, practice bombs were not live, but contained a small charge to aid in "spotting" the bomb hit. Spotting charges that did not detonate could still be intact in the ordnance and constitute a hazard, although it is likely that any ordnance remaining for the past 65 years has been affected by the corrosive environment of the relatively shallow salt waters of the Salton Sea (USACE FUDS database; see Table 14-1 for website link).

Unexploded ordnance and munitions may lie on or within the floor of the Salton Sea over the 12,200 acre area where the bombing targets previously existed....No records were obtained indicating that ordnance clearance and decontamination occurred at the bomb target sites outside the SSTB. The U.S. Army Corps of Engineers report (USACE, 1996) on the sites recommended further assessment of Ordnance and Explosive Waste for these sites. Historical records specify "no restoration required other than target removal" for the practice bomb targets (USACE FUDS database). However, it is unclear whether these recommendations were based only on considerations for removal of visual evidence of the bomb targets or whether they also accounted for clearance of practice bombs from the Sea Bed.

Under "Next Steps," the PEIR indicated that:

As part of the Base Realignment and Closure program, the U.S. Navy concluded that risk management actions that included recurring reviews, minimizing public access and soil disturbances, and notification requirements should occur prior to land use changes in areas with potential ordnances. The U.S. Navy also concluded that a secondary alternative (2-Foot Clearance) would be implemented to survey and remove or detonate

in place any detected ordnance in the event that future changes in land use, such as construction of major facilities or development, would require the removal of unexploded ordnance (U.S. Navy, 1999). The reference to 2-Foot Clearance was not intended to imply that ordnance removal necessarily would be limited to the surface 2-foot layer (U.S. Navy, 1999). In accordance with their memorandum of understanding with the BLM, as well as CERCLA requirements and standard procedures for managing unexploded ordnance, the U.S. Navy would continue to evaluate changes in the physical conditions of the Salton Sea shoreline, public accessibility, applicability of new technologies for detecting ordnance, and the on-going effectiveness of this response (U.S. Navy, 1999). These procedures are expected to reduce potential risks to public safety from encounters with ordnance and explosive waste. However, it is possible that some remnant ordnance is buried at depths in shoreline soils and/or the Sea Bed that exceed the sensitivity of currently available technology and would be undetectable during a clearance survey, yet still susceptible to disturbance by earth-moving equipment or placement of pilings or rock during construction.

Today, the US Department of Defense (DOD) is responsible for the environmental restoration (cleanup) of properties that were formerly owned by, leased to, or otherwise possessed by the United States and under the jurisdiction of the Secretary of Defense prior to October 1986. Such properties are known as Formerly Used Defense Sites (FUDS), and include Bomb Targets 51 and 54. The US Army is DOD's lead agent for the FUDS Program, and the US Army Corps of Engineers (Corps) executes the FUDS Program on behalf of the US Army and DOD. The US Army and DOD are dedicated to protecting human health and the environment by investigating and, if required, cleaning up potential contamination or munitions that may remain on these properties from past DOD activities. A 2009 site inspection report conducted for Bomb Target 51 on behalf of the Corps as part of the FUDS Program (Parsons 2009) concluded that there is a potential for explosive hazards to remain, along with munitions constituents, and that potential human receptors include future construction workers for the Salton Sea restoration efforts, along with site visitors and recreational user, and that ecological receptors are also receptors for exposure pathways at the site. This report recommended further characterization of the site as part of a Remedial Investigation/Feasibility Study.

Prior to any construction in an area that potentially could contain UXO, the California Department of Water Resources will coordinate with the Corps Los Angeles District, to verify the current state of the bomb targets and determine what remediation, if any, needs to occur prior to construction. No construction would begin before implementing any steps needed to protect the health of construction workers and members of the public, as well as ecological receptors. Therefore, no new significant impacts related to UXO would occur as a result of the proposed modifications to the SCH Project.

No new significant impacts associated with hazards and hazardous materials would occur as a result of the proposed modifications to the SCH Project, nor would a substantial increase in the severity of previously identified significant effects occur.

3.10 Hydrology and Water Quality

Impacts HYD-1 and HYD-2: Evaporation from the ponds would cause a reduction in the Salton Sea's water surface elevation and slightly increase salinity. This would be a less than significant impact even with the proposed modifications because the same volume of water would otherwise flow to the Sea where it would be subject to similar evaporation rate. The Salton Sea will get smaller, shallower, and saltier regardless of whether or not the modified SCH Project is implemented; however, the modified Project would restore a portion of the lost habitat by providing new habitat that is usable by birds, fish, and other organisms. The modified SCH Project would not, in itself, result in changes that would have an adverse effect on or preclude the beneficial uses of the Salton Sea identified in the Basin Plan, as described in the EIR/EIR.

Impact HYD-3 is applicable to the modified SCH Project because similar types of pond operations would be performed in areas with generally similar water quality, and this would cause changes in Salton Sea water quality but would not violate established standards, a less than significant impact.

Impact HYD-4: Construction and maintenance of the proposed modifications would have the potential to temporarily degrade water quality at the Salton Sea, which would be a less than significant impact. As described in the EIS/EIR, an Erosion and Sediment Control Plan and a Stormwater Pollution and Prevention Plan would be implemented for construction and maintenance activities, and these plans would address the potential for erosion and incorporate appropriate protections into the design. Impacts associated with pesticides would be similar to those described in the EIS/EIR because they are present in all of the expanded locations. Therefore, no new significant impacts due to the modified Project.

Impact HYD-5: Potentially damaged berms from the modified components would be repaired promptly, and impacts would be less than significant. Modified components would not create a significant impact on nearby canals or drains because the berms would be down-gradient, and any water released from the ponds would flow away from them, toward the Salton Sea. The analysis in the EIS/EIR applies to the modified SCH Project because impacts from the use of water from the New and Alamo Rivers would be as described in the EIS/EIR. It also would apply to water from the Whitewater River because there are no other downstream users. The use of groundwater was not one of the water supplies evaluated in the EIS/EIR. It would be used to provide water to the Torres Martinez ponds, and this impact was already evaluated in the Mitigated Negative Declaration prepared for this project (Salton Sea Authority 2014), which concluded that no impacts would occur.

No new significant impacts on hydrology and water quality would occur as a result of the proposed modifications to the SCH Project, nor would a substantial increase in the severity of previously identified significant effects occur.

3.11 Land Use

No new significant or substantially more severe impacts on land uses would occur in the surrounding areas as a result of the proposed modifications. Given implementation of mitigation measures identified in the EIS/EIR, the areas around the New and Alamo Rivers would be compatible with the Imperial County General Plan and other applicable land use plans or policies. The dust control measures are being developed in coordination with IID, ICAPCD, SCAQMD, and others, which would ensure that they are consistent with the plans and policies of these agencies.

With mitigation, the portion of the modified SCH Project near the Whitewater River would also be consistent with the policies of the Riverside County General Plan and Eastern Coachella Valley Area Plan (e.g., Riverside County 2015a, b, c, d). The latter plan notes that reduction of inflow into the Salton Sea will lead to a wide range of impacts to the Sea, wildlife, and human health due to decreased water volume and increased salinity concentration and exposed salt beds, issues that are being addressed by the modified SCH Project. Specific policies include promoting stronger controls to reduce particulate matter and promoting healthy communities, which are consistent with the goals of the modified SCH Project. Any impacts would be less than significant.

No new significant impacts associated with land use would occur as a result of the proposed modifications to the SCH Project, nor would a substantial increase in the severity of previously identified significant effects occur.

3.12 Noise

Impact NOI-1: There are no significant noise impacts as a result of the proposed modifications. Construction at all three locations would occur in a sparsely developed agricultural area lacking in sensitive receptors. Impacts on visitors to the Sonny Bono National Wildlife Refuge would remain

unchanged from those described in the EIS/EIR because no additional construction would occur closer than analyzed in the EIS/EIR.

Impact NOI-3: Similar amount of noise would be generated along the same roads or roads with similar characteristics (located in a sparsely populated agricultural area). Additionally, truck trips would be spread out over a 10-year period and divided between three locations. Overall, impacts would be similar to those of the original SCH Project and would remain less than significant.

Impacts NOI-4 and NOI-5: No additional construction would occur near Red Hill Park, nor would additional pumps be added.

No new significant impacts associated with noise would occur as a result of the proposed modifications to the SCH Project, nor would a substantial increase in the severity of previously identified significant effects occur.

3.13 Paleontological Resources

Impact PALEO-1: No new significant impacts on paleontological resources would occur. **MM PALEO-1, MM PALEO-2, and MM PALEO-3** would be implemented as described in the EIS/EIR, which would mitigate impacts from ground-disturbing activities on paleontological resources to less than significant.

No new significant impacts on paleontological resources would occur as a result of the proposed modifications to the SCH Project, nor would a substantial increase in the severity of previously identified significant effects occur.

3.14 Population and Housing

Impact POP-1: Modifications to the Project would result in out-of-town construction workers, causing a temporary, slight increase in both Imperial and Riverside County populations, which would be a less than significant impact. Most workers would be drawn from the local populations in Imperial and Riverside Counties over the 10-year period of construction. Both counties have large pools of workers available – approximately 2,000 and 100,000, respectively (EDD 2017a, b), and unemployment is particularly high in Imperial County (currently approximately 20 percent). Construction of the original SCH Project would have lasted approximately 2 years, during which time it is estimated that approximately 100 construction workers would have been required. Since construction of the modified SCH Project would last for approximately 10 years, workers would be required for a longer time, but it is anticipated that similar numbers of workers would be required when construction occurred in each county. Some heavy equipment operators may be brought in from other major metropolitan areas (e.g., San Diego, Sacramento, or San Francisco), as described in the EIS/EIR. This would represent a minor increase in the local populations of both counties and would be less than significant.

Impact POP-2: Project modifications might result in increased visitation by researchers and the public. This would not result in additional new significant impacts because the newly restored habitat would be concentrated in areas further toward the center of the Salton Sea on newly exposed playa and would not result in any long-term changes in population in the surrounding areas.

No new significant impacts on population and housing would occur as a result of the proposed modifications to the SCH Project, nor would a substantial increase in the severity of previously identified significant effects occur.

3.15 Public Services

Impact PS-1: Modifications would not increase the demand for emergency or other services during construction in comparison to the proposed Project. Construction and maintenance activities could result in increased demand for emergency services (police, fire, and trauma centers), and could increase use of

the Project site by recreational visitors. This would remain a less than significant impact because the Project does not include any unusually dangerous activities, and the increased demand associated with construction and maintenance activities would be within the capacity of local emergency service providers. The increased demand would not be expected to affect the ability of providers to maintain their current level of service or require new or altered facilities. Additionally, the risk of an accident from recreational activities is low.

No new significant impacts on public services would occur as a result of the proposed modifications to the SCH Project, nor would a substantial increase in the severity of previously identified significant effects occur.

3.16 Recreation

Impact REC-1: Recreational opportunities would potentially increase given the modifications to the SCH Project due to newly created ponded habitat that supports fish and bird life on the exposed playa around the Sea. There would be potential for new access and opportunities for passive and active recreational activities such as bird watching or fishing.

No new significant impacts on recreation would occur as a result of the proposed modifications to the SCH Project, nor would a substantial increase in the severity of previously identified significant effects occur.

3.17 Transportation

Impact TRAN-1: The proposed modifications would increase traffic during construction, maintenance, and operations, but would not reduce the level of service of any roadways below Imperial or Riverside County standards. The primary difference between the originally proposed and modified project would be that under the modified project, vehicular traffic required for construction near the Whitewater River would divert onto local farm roads from either State Route (SR-) 86 or SR-111 to access the construction sites. The volume of traffic on SR-86 and SR-111 and the local roads used to access the New and Alamo River areas would be comparable to that described in the EIS/EIR; it would just be spread out over a longer period of time. The amount of traffic on these roads is currently generally comparable to that present when the EIS/EIR was prepared (Caltrans 2010 and 2016, County of Imperial 2008); therefore, impacts would be similar and less than significant. As described in the EIS/EIR, minimal personnel would be required to maintain and operate the ponds and dust suppression measures. Therefore, long-term impacts would be less than significant as well.

Impacts TRAN-2 and TRAN-3: Similar types of construction equipment would be used and similar safety procedures would be followed as described in the EIS/EIR, which would ensure that conflicts with farm vehicles and equipment and emergency vehicles would be less than significant.

No new significant impacts on traffic and transportation would occur as a result of the proposed modifications to the SCH Project, nor would a substantial increase in the severity of previously identified significant effects occur.

3.18 Utilities and Service Systems

Impact UT-1: Dust suppression water would be required during construction of the ponds and associated infrastructure, but would not exceed existing supplies, even with proposed project modifications. The modified Project would involve construction of roughly four times the amount of habitat/dust suppression measures as restored by the SCH Project, but it would be spread out over a period of 10 years instead of 2 years. Water would be provided by IID for sites in Imperial County and the Coachella Valley Water District for sites in the north, near the Whitewater River. Therefore, demand in any given year would likely

be similar to the demand estimated for the original Project and would represent a small portion of the overall supplies of each district, which would be a less than significant impact.

Impact UT-2: Based on the increase in acreage, approximately 400 tons of similar types of solid waste would be generated. As shown on Table 3.21-2 of the EIS/EIR, a number of landfills are available with adequate capacity to accept this amount of solid waste well into the future. Impacts would remain less than significant. Minimal solid waste disposal would be required during maintenance and operations, and described for the original SCH Project. Impacts would be less than significant.

No new significant impacts on utilities and service systems would occur as a result of the proposed modifications to the SCH Project, nor would a substantial increase in the severity of previously identified significant effects occur.

3.19 Cumulative Impacts

The proposed modifications would not result in new significant cumulative impacts or increase the severity of cumulative impacts identified in the EIS/EIR. Cumulative impacts would be similar to those of the SCH Project because project-specific impacts would be similar, resulting primarily from construction activities, which would combine with those of other nearby projects in similar ways. Long-term impacts would be beneficial to regional air quality, habitat, and recreational opportunities, and would not contribute to adverse environmental impacts in combination with other projects.

4 Conclusions

As discussed in Section 3, implementing the modified SCH Project, even with the proposed changes due to the 10 year plan, would result in impacts similar to those already analyzed in the SCH Project EIS/EIR, and none of the new elements described above (increased acreage at expanded locations plus dust suppression measures) would trigger the need for preparing a subsequent EIR or a supplement to the EIR because:

- > There are no substantial changes that would cause new significant environmental effects or a substantial increase in the severity of previously identified significant effects, nor have substantial changes occurred to the circumstances under which the Project would be constructed.
- > No new information of substantial importance has been identified that would result in significant effects not discussed in the previous EIR or a substantial increase in the severity of significant effects.
- > No new mitigation measures or alterations to mitigation measures are required.

Section 15164 of the CEQA Guidelines describes the conditions under which an addendum to an EIR should be prepared as follows:

- (a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR or Section 15163 calling for preparation of a supplemental EIR have occurred.

Thus, this addendum meets the requirements under CEQA.

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