Finding of No Significant Impact

(FONSI)

LC-24-07

Final Environmental Assessment (EA) for the IID 2024-2026 Temporary Colorado River System Water Conservation Project

Based on a thorough of the analysis of the potential environmental effects section of the Final EA, the Bureau of Reclamation (Reclamation) finds that implementation of the Proposed Action will not significantly affect the quality of the human environment within or adjacent to the project area, therefore an Environmental Impact Statement will not be prepared.

Accordingly, this FONSI has been prepared and is submitted to document environmental review and evaluation of the Proposed Action in compliance with the National Environmental Policy Act (NEPA) of 1969, as amended.

Recommended: MICHAEL BOYLES Digitally signed by MICHAEL BOYLES Date: 2024.08.09 11:15:54 -07'00' _____

Manager, Environmental Compliance Group

Approved: SHONNA DOOMAN Digitally signed by SHONNA DOOMAN Date: 2024.08.09 11:20:00 -07'00' _____

Chief, Resource Management Office

BACKGROUND

The United States Bureau of Reclamation (Reclamation) is considering approval of a System Conservation Implementation Agreement (SCIA) with Imperial Irrigation District (IID) to participate in the Lower Colorado River Basin System Conservation and Efficiency Program (LC Conservation Program). The approval of the SCIA pursuant to the LC Conservation Program is the "Proposed Action."

IID is an irrigation district, a limited-purpose public agency, formed under the laws of the State of California. IID holds rights to divert water from the Colorado River and deliver it to its water users, including farmers, tenants, landowners, cities, unincorporated areas, and special districts within a portion of Imperial County. IID was formed by a vote of the people pursuant to the California Irrigation District Law (formerly the "California Irrigation District Act") in 1911. Shortly thereafter, IID acquired 13 mutual water companies in the Imperial Valley which had developed and operated water distribution canals.

The Colorado River Basin is experiencing the driest 23-year period in the historical record. Prolonged drought and low runoff conditions accelerated by climate change have led to historically low water levels in Lakes Powell and Mead. Over the last two decades, the United States Department of the Interior has engaged with Colorado River Basin partners on various drought response operations. On April 16, 2019, the Colorado River Drought Contingency Plan Authorization Act (Public Law 116-14) was signed into law. This Act directed the Secretary to execute specific agreements referred to as the "DCP Agreements," and the DCP Agreements were subsequently executed on May 20, 2019.

However, given that water levels in Lake Powell and Lake Mead have continued to decline, additional actions are necessary to protect the Colorado River system. In June 2022, Reclamation Commissioner Camille Calimlim Touton testified before the U.S. Senate Committee on Energy and Natural Resources and called on water users across the Colorado River Basin to take actions to reduce demands or conserve water in the range of 2 to 4 million acre-feet per year for four years (2023 through 2026) to stabilize reservoir elevations at Lake Powell and Lake Mead. These actions were also needed to prevent the reservoirs from falling to critically low elevations that would threaten water deliveries and power production.

On October 12, 2022, Reclamation sent a letter to interested parties having a Colorado River water delivery contract or entitlement holders and Central Arizona Project water delivery contract or subcontract holders, announcing the funding opportunities for voluntary participation in the new LC Conservation Program.

In response to the October 2022 Letter, IID submitted to Reclamation a four-year LC Conservation Program 1.b proposal dated November 21, 2022, to cover calendar years 2023 through 2026. Reclamation evaluated IID's four-year proposal pursuant to the proposal and selection requirements shown in Enclosure 1 to Reclamation's October 12, 2022 letter and Proposed IID's four-year proposal for inclusion in the LC Conservation Program. This program will require a System Conservation Implementation Agreement with Reclamation similar to previous system conservation efforts in the Lower Colorado River Basin. IID and Reclamation agreed to separate IID's proposal into two parts, one SCIA for calendar year 2023 and one SCIA for calendar years 2024 through 2026. The Proposed Action includes only the calendar years 2024 through 2026 SCIA.

In response to IID's four-year LC Conservation Program 1.b proposal, Reclamation determined that an EA would be prepared in compliance with NEPA to assist with the identification of any potentially significant impacts that could result from the implementation of the Proposed Action. Reclamation is the lead Federal agency for preparation of the EA and for compliance with the Endangered Species Act (ESA) and the National Historic Preservation Act (NHPA).

Reclamation prepared the *Environmental Assessment IID 2024-2026 Temporary Colorado River System Water Conservation Project (LC-24-07)*. The EA is incorporated by reference into this FONSI.

Reclamation's approval of the Project will be granted by signing this FONSI and by execution of the SCIA.

ALTERNATIVES CONSIDERED

The EA analyzed the No Action Alternative and the Proposed Action.

No Action Alternative

Under the No Action Alternative, IID would not participate in the LC Conservation Program. There would be no volume of conserved water created within IID's Contract Service Area under the LC Conservation Program. No changes to IID's Colorado River water deliveries or on-farm practices would occur.

The Proposed Action

The Proposed Action (Selected Alternative) will involve the conservation of Colorado River water by IID pursuant to the SCIA. The water conservation will occur within the IID Contract Service Area, which is also the "Proposed Action Area," located in Imperial County, California.

Under the Proposed Action described in the EA, IID would agree to conserve a target volume of 250,000 AF, up to a maximum of 300,000 AF, of Colorado River water each year from 2024 through 2026, targeting a cumulative total of 800,000 AF, but no more than a cumulative maximum total of 900,000 AF, of water between 2024 and 2026, which will remain in Lake Mead to benefit the Colorado River System. The terms and conditions of the Colorado River System water conservation and funding are set forth in the SCIA with IID. After negotiation with IID, the Final SCIA reduces the cumulative total of conserved water to 700,000 AF, which in turn reduces the overall impacts of the Proposed Action, so no additional analysis is required.

IID has received delivery of approximately 2.5 MAFY from the Colorado River during the period from 2019 through 2022. This volume is down from the approximately 3 MAFY volumes experienced prior to the implementation of water conservation programs initiated under the Quantification Settlement Agreement (QSA) beginning in 2003. Annual Colorado River water deliveries to IID vary annually primarily based on cumulative agricultural demands in the IID Contract Service Area that are affected by several factors, including economic and climatic conditions. The water conservation programs implemented pursuant to the Proposed Action will temporarily further reduce IID deliveries to approximately 2.2 MAFY for three years from 2024 through 2026. Colorado River water deliveries to IID will return to pre-Proposed Action volumes beginning in 2027 upon the expiration of the SCIA and conclusion of the water conservation programs provided for by the SCIA. The Proposed Action will provide the funding for IID's implementation of water conservation programs under which agricultural water users conserve

water, thereby reducing water diversions from the Colorado River at Imperial Dam. The potential conservation programs include the following:

- On-Farm Efficiency Conservation Program (OFECP) or Simplified OFECP,
- Deficit Irrigation Program (DIP), and
- Farm Unit Fallowing Program (FUFP).

Under the Proposed Action, IID may implement the existing OFECP or a simplified OFECP. The maximum acreage potentially participating in the OFECP or the simplified OFECP is 65,000 acres per year resulting in up to a maximum of 50,000 acre-feet per year of efficiency-based conserved water.

Under the Proposed Action, IID may implement the DIP for agricultural water users on fields anywhere in the IID Contract Service Area that are owned or leased for agricultural use and cultivating alfalfa, bermuda grass, or klein grass, or seeds for one of these three crops. Participating fields will be allowed to choose between a 45-day to 60-day time period within the months of June, July, August, and September during which time the field will not be irrigated. The maximum acreage potentially participating in the DIP is 180,000 acres per year resulting in up to a maximum of 226,000 acre-feet of conserved water per year. Participating fields will be paid for the water conservation volume attributable to the fallowed 45-day to 60-day time period on a per acre-foot basis.

Under the Proposed Action, IID may implement the FUFP. Farm units are an aggregation of fields managed by an agricultural water user. Participating farm units will forego delivery of irrigation water on certain fields within the farm unit for the term of 6 months to one year. The FUFP will be for a 6-month to one-year fallowing period beginning July 1st of one year up to June 30th of the following year consistent with typical agricultural lease terms. To implement the FUFP, IID will determine the total volume of conserved water required for the FUFP based on participation in the OFECP and/or DIP and the remaining conserved water volume needed to meet IID's conservation targets. Each farm unit will be offered a pro-rata share of the total FUFP conserved water volume. The agricultural water user will be allowed to accept the volume offered and identify which field(s) in a farm unit to be fallowed. The maximum acreage potentially participating in the FUFP is 34,450 acres resulting in up to a maximum of 172,250 acre-feet of conserved water for a one-year period. However, due to the term of the FUFP, IID will only be able to implement one one-year program by the end of 2026, from July 1, 2025 through June 30, 2026. Under this one-year program, for the 6 months in 2025 (July 1 through December 31) the maximum acreage potentially participating in the FUFP is 34,450 acres resulting in a water conservation volume of up to a maximum of 86,125 acre-feet. Similarly, for the 6 months in 2026 (January 1 through June 30), the maximum acreage potentially participating in the FUFP is 34,450 acres resulting in a water conservation volume up to a maximum of up to 86,125 acre-feet. If IID implements a 6-month program before or after the one-year program, any 6-month period will be the same maximum acreage potentially participating in the FUFP and the same maximum water conservation volume resulting from that acreage as set forth above. Participating farm units will be paid for the water conservation volume attributable to the fallowed fields for the 6-months to one-year term on a per acre-foot basis.

CONSULTATION AND COORDINATION

Reclamation and IID have consulted with various agencies and interested parties to identify potential issues or concerns prior to the initiation of formal consultation. Specifically, Reclamation and IID met with the US Fish and Wildlife Service (USFWS), the California Natural Resources

Agency , and the California Department of Fish and Wildlife (CDFW) on several occasions to discuss the Proposed Action. Reclamation consulted with the USFWS pursuant to Section 7 of the Endangered Species Act and on July 24, 2024 received their concurrence that the project is not likely to adversely affect threatened and endangered species within the project area.

In November 2023 Reclamation delivered an announcement of the proposed project and consultation invitation letter to 27 identified Tribes. Reclamation has since received responses from and discussed the Proposed Action with several Tribes. Reclamation has been informed of the presence of specific traditional cultural resources; these are, however, located outside of the area of the Proposed Action and will not be affected. Reclamation's Tribal partners have also requested additional information regarding the nature and scope of prior ground disturbance in the area of the Proposed Action and voiced concerns regarding the effects of ground-disturbing programs funded by the Proposed Action. Information regarding prior ground disturbance in the Proposed Action and clarification of the nature and scope of the ground-disturbing activities funded by the Proposed Action was gathered by Reclamation from IID and disseminated to the requesting Tribes via email and telephone. Reclamation representatives appeared before the Torres-Martinez Desert Cahuilla Indians Tribal Council to get their feedback on the project on July 24, 2024. Reclamation continues to maintain dialogue with those Tribal partners who have expressed interest in the project.

ENVIRONMENTAL COMMITMENTS

Biological Resources

The IID Drain and Salton Sea Vegetation Monitoring and Reporting Plan will be implemented as part of the Proposed Action, including:

Monitoring

Drains

1. Flow Monitoring: Drain flow data will be collected from IID drains that flow directly into the Salton Sea on an ongoing basis using on of the following methods: Automatic Sensors or Hand-held water current meters
2. Visual Monitoring: IID will conduct weekly drain habitat monitoring by photographic documentation for each drain identified on the IID Drain List.
3. Farmland Mapping: IID will develop maps showing drain-sheds for the drains that flow directly to the Salton Sea. IID will develop a map showing the 5-year (2019-2023) historical field participation in the existing OFECP. IID will develop maps showing fields participating in the IID conservation programs under the Proposed Action.

Vegetation

IID will map existing vegetation communities adjacent to the termini of IID drains along the southern shoreline of the Salton Sea which will be provided to the USFWS, Reclamation, and CDFW upon completion.

Mapping will be completed using a combination of high resolution multi-spectral satellite imagery and object-based image analysis techniques informed by field survey observations. Satellite imagery with ultra-high and high resolution will be acquired. The resolution specifications will be provided with any imagery submitted. Field surveys will be completed within 4 to 6 weeks of satellite imagery acquisition along the periphery of the vegetated areas within the Vegetation Monitoring Areas where accessible. Unmanned Aerial Vehicle video transacts will also be collected for interior portions of

the vegetated areas inaccessible on foot. The satellite imagery and field survey data will be processed and analyzed to develop vegetation community maps. Processing the satellite imagery and field survey data involves 3 steps: 1) conversion to reflectance and calculation of vegetation indices, 2) classification, and 3) accuracy assessment.

Conversion to reflectance and calculation of vegetation indices:. Reflectance of light spectra from plants/leaves changes with plant type, water content within tissues, and other intrinsic factors. The reflectance from vegetation to the electromagnetic spectrum allows for the mapping of vegetation using raw satellite imagery. The raw satellite imagery values are in Digital Number (DN). Vendor specified protocols will be used to convert DN values to reflectance values. Reflectance values are generally recommended for use in vegetation index calculations as it provides a more accurate representation and can be used analytically in a canopy reflectance model.

Classification: Satellite imagery will be analyzed using the Object Based Imagery Analysis (OBIA) technique. Specifically, imagery will be segmented to derive hierarchical objects that clearly delineate relevant plant communities at a fine scale. OBIA allows for incorporating meaningful non-spectral features (i.e. texture, size, shape, etc.) for class separation and classification and accounts for landscape hierarchy of vegetation ecosystem organization and structure. The field surveys will be used to classify a subset of objects as ground-truth and training data for the machine learning algorithm. A trained ecologist using photo-interpretive techniques and ground truth video transects will review the machine learning classification results.

Accuracy assessment: A subset of field survey points will be held out of the classification and used for an independent validation and accuracy assessment. Map accuracy will be reported for all classes using a fusion matrix approach. This will provide information on accuracy and misclassification

Action Triggers

Drains

Automatic Sensors. For the drains with automatic sensors installed, the automatic sensors have the capability of triggering a signal when flows reach a zero-flow level.

Hand-Held Current Meters. For the drains measured with the hand-held current meters once a week, there is no historical data of the drain flows. However, an indication of drain flows are the irrigation delivery schedules of the fields that drain into that specific drain.

Vegetation

IID will develop an early warning system focused on monitoring potential changes in the biophysical conditions of the mapped vegetation communities in the Vegetation Monitoring Areas. The early warning system will involve the monitoring of the mapped vegetation communities using satellite-based indices representative of surface water stress and vegetation productivity/vigor. Specifically, this includes the use of the Normalized Difference Water Index (NDWI) for water stress and Leaf Area Index (LAI) for vegetation productivity/vigor. NDWI is a measure of surface water stress using a satellite-derived index from the Near-Infrared and Short-Wave Infrared channels.

Impact Avoidance Measures

Drains

When an action trigger is reached for any of the drains, with or without automatic sensors, IID will implement the following impact avoidance measures:
1) IID staff responsible for monitoring the drains for the action triggers will notify operational and/or field staff to conduct a site visual check of the drain during that same day;
2) During the site visual check, IID staff will take photographic documentation of the conditions within the drain at or near the habitat monitoring locations;
3) If there is no ponded water within or at the terminus of the drain that can be seen from the habitat monitoring location, within no more than 18 hours following the site visual check, IID staff will deliver water to the affected drain via water truck at a location that can be safely accessed by the water truck downstream of the last structure on the drain; and
4) IID will deliver water to the affected drain via water truck each following day until the automatic sensor indicates flows have returned to the affected drain or irrigation deliveries have resumed to fields draining into the affected drain.

Vegetation

If an early warning threshold of meaningful change is triggered for the vegetation within the Vegetation Monitoring Areas, additional vegetation monitoring and analysis actions will be implemented to determine the cause of a meaningful change in the mapped vegetation communities. Within 15 days of the action trigger, IID will submit a set of actions to USFWS, Reclamation, and CDFW, which may include the additional collection and analysis of UAV imagery/video, ground-truth data, and high-resolution satellite imagery to determine whether there is a reduction in NDWI and LAI, the area of reduction, and whether the reduction is isolated to specific drain-sheds or part of a broader Salton Sea-wide phenomenon. If IID determines that the change is linked to a specific drain-shed affected by the conservation programs implemented under the Proposed Action, IID will take immediate action to deliver water to the affected vegetation via the drain or drains flowing water to the vegetation via water truck each following day until IID is able to limit participation in the conservation programs for the fields within that drain-shed.

Coordination and Reporting

IID will meet with USFWS, Reclamation, and CDFW staff on a quarterly basis during the short-term period of the Proposed Action to review the collected drain flow monitoring data and vegetation monitoring data for the prior quarter. During these meetings, IID will also report on the implementation of action triggers and impact avoidance measures for the prior quarter. IID will also prepare an annual report for submittal to USFWS, Reclamation, and CDFW by March 31 of each year under the Proposed Action. The annual report will include compiled drain and vegetation monitoring data for the year and information regarding the implementation of action triggers and impact avoidance measures during that year.

ENVIRONMENTAL IMPACTS AND FINDINGS

The potential for impacts to a wide range of resources was considered in the EA. It was determined that there will be no adverse impacts affecting the following and these were not carried forward for additional analysis: Agriculture/Forestry Resources, Energy, Floodplains and Wetlands; Geology/Soils, Greenhouse Gas Emissions, Hazards & Hazardous Materials, Land Use, Mineral

Resources, Noise, Populations/Housing, Public Services, Recreation, Transportation, Utilities/Service Systems, Wildfire, Indian Trust Assets (ITA) and Indian Sacred Sites.

Seven key issues and their corresponding resource areas were identified for analysis in the EA. These resource areas identified for analysis were Air Quality, Biological Resources, Cultural Resources, Environmental Justice, Human Health, Hydrology/Water Quality, and Visual Resources.

Implementation of the Proposed Action will not result in significant impacts to any of the resources evaluated within the EA. The impacts described in the EA are further reduced due to the lower volume of water that will be conserved under the SCIA (700,000 AF in the SCIA vs 900,000 AF as analyzed). It is Reclamation's determination that the implementation of the Proposed Action will not significantly impact the human environment, and an EIS will not be required.

RESOURCES EVALUATED IN THE EA

Air Quality

The Proposed Action involves the conservation of water within the IID Contract Service Area, reducing water diversions from the Colorado River. The conservation of water will occur through the implementation of on-farm conservation programs, meaning all participation will be within existing agricultural fields. The Proposed Action includes the implementation of conservation programs by IID within its Contract Service Area for a temporary, short-term three-year period of time. Participation in the conservation programs will be voluntary and incentivized by payment for the conserved water created by the programs.

The Proposed Action will accelerate the lowering elevation of the Salton Sea, thereby accelerating the exposure of the shoreline. This acceleration in turn will result in the earlier potential for increasing fugitive dust emissions and related HAP emissions and exposure to communities surrounding the Salton Sea. The reduction of the Salton Sea may also result in an earlier increase of anaerobic organic decay with increasing concentration of sulfates and other compounds present in the saline Salton Sea, which will lead to increasing H2S emissions. Odors could also occur earlier from increasing concentrations of nutrient levels and fish, bird, plant, algae, and phytoplankton die-offs. However, while it is possible that these events may occur earlier, they will still occur without the Proposed Action.

The Proposed Action involves the temporary, short-term conservation of water during three years and will accelerate the lowering elevation of the Salton Sea and overall water surface area; however, the temporary impacts associated with the Proposed Action will taper off to projected future baseline levels by the year 2045. Thus, the Proposed Action, when considered with relevant past, present, and reasonably foreseeable projects that involve the potential for water conservation and reduced water flow to the Salton Sea, will not significantly increase overall emissions when considered with other projects in the Action Area.

Participation in the DIP or FUFP will require implementation of Best Management Practices to ensure that potential dust emissions are controlled on participating fields.

Biological Resources

The Proposed Action involves the conservation of water within the IID Contract Service Area, reducing water diversions from the Colorado River. The analysis of the Proposed Action follows an approach similar to that used in the QSA EIR/EIS to identify impacts for biological resources due to reduced flows. The QSA EIR/EIS assessed the following water conservation measures for their

potential to effect biological resources: (1) IID system efficiencies (e.g., 12-hour delivery and seepage recovery programs), (2) on-farm irrigation system improvements (e.g., tailwater return systems and drip irrigation) and (3) temporary fallowing farmland and select Salton Sea mitigation sites.

The Proposed Action will be limited to water conservation and will not involve the construction of projects. The Proposed Action is expected to result in an average annual reduction in drain flows of 11.9 percent during three years, calendar years 2024 through 2026. To assess the effects of these drain flow reductions, an analysis of existing flow variability was conducted.

The Proposed Action may alter flows within the water delivery and drainage system but will not reduce the overall flows within IID's canal system. The Proposed Action will accelerate the lowering elevation of the Salton Sea, thereby accelerating the exposure of the shoreline but the acceleration will taper off to baseline projection levels by 2045 based on the trajectory predicted by hydrologic models developed by Department of Water Resources (DWR). The Proposed Action when considered with relevant past, present and reasonably foreseeable projects that involve the potential for water conservation and reduced water flows to the Salton Sea, will not significantly increase overall potential effects to biological resources. The IID Drain and Salton Sea Vegetation Monitoring and Reporting Plan will be implemented.

Cultural Resources

The Proposed Action will consist of normal agricultural practices and restrict ground-disturbing activities to areas of disturbed agricultural land. These practices are unlikely to encounter known or unknown archaeological, historic, paleontological resources. The conservation programs are on-farm programs; all participation will be within existing agricultural fields. Agricultural fields are disturbed on the surface down to at least the tile drains – most commonly placed 3 to 6 feet below the surface. As a result, the Proposed Action is not be expected to encounter previously unknown cultural resources. Impacts of the Proposed Action will be similar to the No Action Alternative.

The implementation of water conservation programs under the Proposed Action will not contribute to cumulative impacts to cultural resources in the project area. The Proposed Action will not involve land-disturbing activities beyond the present boundaries of existing fields with a recent demonstrated history of water usage and will not exceed the depth of the drain tiles or other prior disturbance – areas where extensive, historical ground disturbance has already occurred.

Environmental Justice

Under the Proposed Action, IID would implement a combination of conservation programs. By the structure and nature of each conservation program, fields cannot participate in more than one conservation program at a time. IID intends to prioritize the OFECP and DIP water conservation programs. The implementation of the OFECP (or simplified OFECP) would result in no changes to or adverse effects on the environment of minority or low-income populations. The agricultural land would remain in production to the same extent it would otherwise be in production. The implementation of conservation measures under either the OFECP or the simplified OFECP would result in conserved water from existing agricultural land.

Under the Proposed Action, the combination of conservation programs may include the implementation of the fallowing-based conservation programs. If both the FUFP and the DIP were to be implemented, the maximum potential acreage for either program would not be reached. Agricultural land cannot participate in both programs at the same time. Therefore, if one field is in one program, it cannot simultaneously be in the other program, thereby bringing down the maximum level of participation possible for that other program. The maximum level of participation

for either fallowing-based conservation program will be even lower if there are fields participating in the OFECP and will then also not be eligible for participation in a fallowing-based conservation program.

If maximum participation were to occur in the DIP, up to 180,000 acres of agricultural land could stop being irrigated for a 45- to 60-day period between the months of June through September for each of the three years of 2024, 2025, and 2026. Fields participating in the DIP would only be alfalfa, bermuda grass and klein grass crops, which are perennial crops grown year-round and would be in active agricultural production before and after participation in the DIP. The crop would cease receiving water for 45 to 60 days, but then the agricultural activities would resume on the field following that period of time for the remainder of the year. Therefore, despite the DIP being a fallowing-based conservation program, the agricultural activities on a field are only interrupted for a short period of time (45 to 60 days out of 365 days) and only during the temporary, short-term span of three years.

Additionally, alfalfa, bermuda grass and klein grass are perennial forage crops that are traditionally flood irrigated and harvested through the use of farm equipment, as opposed to other crops that utilize more labor-intensive harvesting methods, such as fruit and vegetable crops. While local businesses and farm workers may be employed to irrigate and harvest forage crops, a small number of workers and labor hours are required to operate the farm equipment and trucks that perform the mowing, raking, baling, transport, and stacking of the bales. As a result, on-farm labor demand would not significantly change as a result of the Proposed Action. Although some reduction in agricultural-related business activities may occur during the 3 years of the Proposed Action, layoffs of farm workers are not anticipated for the 45 to 60 days of deficit irrigation during the DIP. Furthermore, market conditions for alfalfa, bermuda grass and klein grass are highly variable and low market conditions and pricing can negatively affect agricultural water users' decisions, utilization of agricultural support services and farm irrigation services independent of the DIP. IID anticipates that DIP participation will fluctuate based on market conditions and will allow agricultural businesses to maintain operational continuity during these summer months. Consequently, there would be negligible direct or indirect impacts to the businesses within the agricultural industry and negligible effects on the environment of minority or low-income populations.

If maximum participation were to occur in the FUFP, up to 34,450 acres of agricultural land could be fallowed for 6 months to one year during the two years of 2025 and 2026. Fields participating in the FUFP will be in active agricultural production prior to participation in the program. The field will be fallowed for 6 to 12 months during which time all agricultural activities on the field will cease. However, the agricultural activities will resume on the field following that period of time. If a field is allowed to participate in the FUFP for consecutive years, it would be no longer than the temporary, short-term period of two years. Similar to the QSA, a two-year maximum allowed participation in the FUFP can be implemented and still maintain the integrity of the soils for resumed agricultural production. Although some businesses may be directly affected by the reduced farming activity, economic impacts of the FUFP implemented under the Proposed Action would be negligible given the longest possible period of fallowing would be a temporary, short-term period of two years.

Therefore, although the IID Contract Service Area includes a higher rate of Hispanic/Latino populations and higher rate of residents below the poverty level when compared to the overall State of California, the Proposed Action would not disproportionately affect the minority and low-income populations in the area because the Proposed Action is not expected to significantly affect local

socioeconomic conditions due to the short duration of the reduced farming activities and the compensation for conserved water under the Proposed Action.

Human Health

The Proposed Action involves the conservation of water within the IID Contract Service Area, reducing water diversions from the Colorado River. Implementation of the Proposed Action will result in the acceleration of the lowering of elevation of the Salton Sea when compared to the No Action Alternative. The Proposed Action will accelerate the anticipated exposure of the playa, but the acceleration will taper off to baseline projection levels by 2045 based on the trajectory predicted by hydrologic models developed by DWR. No net increase in the exposure of the playa results in no increase of overall potential dust emissions through 2045. The exposed Salton Sea acreage is anticipated to occur as a result of the QSA and will be addressed by the IID's Salton Sea Air Quality Mitigation Program Plan (SS AQMP). During the three-year period of the Proposed Action, the acceleration of the exposed playa may increase the potential for dust emissions. However, the implementation of the SS AQMP will address the potential dust emissions because implementation of the SS AQMP will be required for those same acres absent the Proposed Action. Data shows that dust emissions are occurring from other sources within and adjacent to Imperial County, including the desert region to the west of the IID Contract Service Area and Mexico to the south. Emissions inventories, assessments, dust control measures, and other activities under the SS AQMP will continue to be implemented, in the same manner as under existing conditions.

The Proposed Action will not significantly contribute to the cumulative reduction of the Salton Sea elevation. The Proposed Action will accelerate the anticipated effects of cumulative flow reductions, but over time, by the year 2045, the conditions at the Salton Sea will be the same as baseline projected conditions. Because the Proposed Action accelerates the exposure of playa that will already occur under existing conditions and does not result in greater exposed playa over the long term, and therefore will be addressed by IID's SS AQMP and the implementation of dust control measures, it will not significantly contribute to cumulative human health impacts within the IID Contract Service Area. The Proposed Action will be consistent with the SSMP and Long-Range Plan. Thus, the Proposed Action, when considered with relevant past, present, and reasonably foreseeable projects will not significantly contribute to cumulative impacts related to human health issues in the IID Contract Service Area.

Hydrology/Water Quality

The effect of the Proposed Action within the IID Contract Service Area was evaluated as an average flow reduction, evenly applied both spatially and temporally. Existing conservation programs implemented pursuant to the QSA comprise approximately 70 percent of agricultural fields within IID's Contract Service Area. The Proposed Action will likely increase the acreage of fields participating in a conservation program. All existing conservation programs and new conservation programs implemented pursuant to the Proposed Action are voluntary and participation cannot be reasonably predicted. Monthly variability in discharge to the Salton Sea from the IID drainage system under existing conditions was analyzed and compared to the Proposed Action.

Due to the temporary short-term nature of the Proposed Action, and lack of long-term effects demonstrated by SSAM, the Proposed Action, when considered with relevant past, present, and reasonably foreseeable projects, will not contribute significantly to cumulative hydrology impacts to the IID Contract Service Area.

Visual Resources

The Proposed Action will occur within the IID Contract Service Area and will not alter the aesthetic character of surrounding desert areas, sand dunes, and mountains located outside the IID Contract Service Area. The Proposed Action will result in minor changes to the visual landscape within the primarily irrigated areas of IID's Contract Service Area and along the southern shoreline of the Salton Sea. The Proposed Action will accelerate impacts of the QSA, but not contribute to the cumulative effect of the lowering elevation of the Salton Sea. Hydrologic modeling conducted by DWR estimate that with implementation of the cumulative projects, the Salton Sea elevation will plateau in 2045. Although the Proposed Action will accelerate the near-term shoreline recession, over the long term, by 2045, the Sea elevation will be similar to the No Action Alternative. Therefore, the Proposed Action, when considered with relevant past, present, and reasonably foreseeable projects, will not contribute significantly to cumulative visual resource impacts within the IID Contract Service Area.