

HYDROLOGY AND WATER QUALITY

This section discusses the potential hydrological and water quality impacts that would occur in association with implementation of the proposed Energy Source Mineral ATLiS Project. This analysis describes the regional hydrologic setting, existing hydrology/drainage (onsite and offsite), and existing flood hazards in the Project area. Water quality is also described in terms of groundwater beneath the Project area and surface waters in the region and the Imperial Valley. Information contained in this section is summarized from the Water Supply Assessment (WSA) prepared by Dubose Design Group (April 2021) and the Preliminary Geotechnical Report prepared by LandMark Geo-Engineers and Geologists (Landmark; August 2020), included in Appendix J and Appendix E of this Draft EIR, respectively.

4.8.1 Existing Environmental Setting

Regional Setting

Imperial Valley, located in the Northern Sonoran Desert, has a subtropical desert climate characterized by hot, dry summers and mild winters. Clear and sunny conditions typically prevail, and frost is rare. The region receives 85 to 90 percent of possible sunshine each year, the highest in the United States. Winter temperatures are mild, rarely dropping below 32 °F, but summer temperatures are very hot, with more than 100 days over 100 °F each year. The remainder of the year has a relatively mild climate with temperatures averaging in the mid-70s.

Rainfall contributes around 50,000 acre-feet (AF) of effective agricultural water per inch of rain. Most rainfall occurs from November through March; however, summer storms can be significant in some years. The 30-year, 1990 to 2019, average annual air temperature was 73.6 °F; and average rainfall was 2.59 inches. This record shows that while average annual rainfall has fluctuated, the 10-year average temperatures have slightly increased over the 30-year average.

The Imperial Valley is bounded on the north by the south shore of the Salton Sea, on the south by the All-American Canal (AAC), on the east by the East Highline Canal, and on the west by the Westside Main Canal. The existence of most surface waters in the area is dependent primarily upon the inflow of irrigation water from the Colorado River via the AAC.

The Imperial Valley lies entirely within the State's Colorado River Hydrologic Region (IWF 2012). The shallow aquifers beneath the Imperial Valley are affected by the inflow of Colorado River waters, the rate of evaporation, the depth of the agricultural tile drains beneath farm lands, and seepage from drains and rivers. The Colorado River is probably the most important source of recharge into shallow groundwater aquifers; approximately 10 percent is percolated to underlying aquifers. Canals, such as the AAC and the East Highline, contribute to recharge because they are unlined; they are sometimes up to 200 feet wide; the AAC flows across many miles of sandy terrain; and the water surface of the canals is higher than the general groundwater levels (County 1997b).

Groundwater basins within the Imperial Region include portions of the Coyote Wells Valley Basin, Borrego Valley Basin, Ocotillo-Clark Valley Basin, West Salton Sea Basin, Ogilby Valley Basin, and all of the Imperial Valley Basin, East Salton Basin, and East Amos Valley Basin, for a total of approximately 2,800 square miles (IWF 2012). The major surface water body within the region is the Salton Sea, and drainage is to the Salton Sea via the New River and Alamo River, a few direct-to-sea drains, and various washes.

Project Site

The Project site is located approximately 3.8 miles southwest of the community of Niland, within the Imperial watershed and Imperial Valley groundwater basin (IWF 2012). The Project site is located on three parcels (APN 020-100-025, 020-100-044, and 020-100-046) north of West Schrimpf Road, east of Davis Road, and south of McDonald Road. No rivers or streams travel through the Project site or are directly adjacent to the Project site. The IID “O” lateral canal is approximately 50 feet north of the Project site (along McDonald Road), the IID “N” lateral canal is approximately 0.25 mile south (along Schrimpf Road), and the Alamo River is approximately 0.7 mile southwest. The “O” and “N” laterals lead toward the Alamo River and surrounding wetlands, which then feed into the Salton Sea.

The Project will share the fire suppression system and the freshwater storage containment pond with HR1. The raw water storage pond currently located on the east side of the HR1 plant will continue to receive canal water from the IID “O” lateral. The Project will also share the existing HR1 stormwater retention basin. The retention basin will be engineered and constructed to contain the combined stormwater storage requirements of both the HR1 and Project plant sites. The stormwater runoff will be contained on the HR1 site and will be managed using any single, or any combination, of the following methods: (1) allowed to evaporate or percolate into the soil, (2) released for non-Project beneficial use onto the undeveloped portion of the Project parcel, and/or (3) pumped from the stormwater basin into the freshwater pond for onsite uses.

4.8.2 Regulatory Setting

Federal

Clean Water Act

The USEPA is the lead federal agency responsible for managing water quality. The Clean Water Act (CWA) of 1972 is the primary federal law that governs and authorizes the USEPA and the states to implement activities to control water quality. The various elements of the CWA that address water quality and that are applicable to the Project are discussed below.

Under federal law, the USEPA has published water quality regulations under Volume 40 of the Code of Federal Regulations (CFR). Section 303 of the CWA requires states to adopt water quality standards for all surface waters of the United States. As defined by the CWA, water quality standards consist of two elements: (1) designated beneficial uses of the water body in question, and (2) criteria that protect the designated uses. Section 304(a) requires the USEPA to publish advisory water quality criteria that accurately reflect the latest scientific knowledge on the kind and extent of all effects on health and welfare that may be expected from the presence of pollutants in water. Where multiple uses exist, water quality standards must protect the most sensitive use. The USEPA is the federal agency with primary authority for implementing regulations adopted under the CWA. The USEPA has delegated to the State of California the authority to implement and oversee most of the programs authorized or adopted for CWA compliance through the Porter-Cologne Water Quality Control Act of 1969 (Porter-Cologne Act), described below.

Under CWA Section 401, applicants for a federal license or permit to conduct activities that may result in the discharge of a pollutant into waters of the United States must obtain a water quality certification from the SWRCB in which the discharge would originate or, if appropriate, from the interstate water pollution control agency with jurisdiction over affected waters at the point where the discharge would originate.

CWA Section 402 establishes the NPDES permit program to control point source discharges from industrial, municipal, and other facilities if their discharges go directly to surface waters. The 1987 amendments to the CWA created a new section of the CWA devoted to regulating stormwater or nonpoint source discharges (Section 402[p]). The USEPA has granted California primacy in administering and enforcing the provisions of the CWA and the NPDES program through the SWRCB. The SWRCB is responsible for issuing both general and individual permits for discharges from certain activities. At the local and regional levels, general and individual permits are administered by RWQCBs.

National Pollution Discharge Elimination System General Industrial and Construction Permits

The NPDES General Industrial Permit requirements apply to the discharge of stormwater associated with industrial sites. The permit requires implementation of management measures that will achieve the performance standard of the best available technology economically achievable and best conventional pollutant control technology. Under the statute, operators of new facilities must implement industrial BMPs in the projects' SWPPP and perform monitoring of stormwater discharges and unauthorized nonstormwater discharges.

Construction activities are regulated under the NPDES General Permit for Discharges of Storm Water Runoff Associated with Construction Activity (General Construction Permit) which covers stormwater runoff requirements for projects where the total amount of ground disturbance during construction exceeds 1 acre. Coverage under a General Construction Permit requires the preparation of a SWPPP and submittal of a Notice of Intent (NOI) to comply with the General Construction Permit. The SWPPP includes a description of BMPs to minimize the discharge of pollutants from the sites during construction. Typical BMPs include temporary soil stabilization measures (e.g., mulching and seeding), storing materials and equipment to ensure that spills or leaks cannot enter the storm drain system or stormwater, and using filtering mechanisms at drop inlets to prevent contaminants from entering storm drains. Typical post-construction management practices include street sweeping and cleaning stormwater drain inlet structures. The NOI includes site-specific information and the certification of compliance with the terms of the General Construction Permit.

State

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act, also known as the California Water Code, is California's statutory authority for the protection of water quality. Under this Act, the State must adopt water quality policies, plans, and objectives that protect the waters of the State. The Act sets forth the obligations of the SWRCB and RWQCBs pertaining to the adoption of Water Quality Control Plans and establishment of water quality objectives. Unlike the CWA, which regulates only surface water, the Porter-Cologne Act regulates both surface water and groundwater.

California Department of Water Resources

The Department of Water Resources (DWR) is responsible for managing and protecting California's water resources, systems, and infrastructure, including the State Water Project (SWP). Some responsibilities of the DWR include preventing and responding to floods, droughts and catastrophic events, informing and educating the public on water issues, developing scientific solutions, restoring habitats, planning for future water needs and climate change impacts, constructing and maintaining facilities, generating power,

ensuring public safety, and providing recreational opportunities. The DWR works with other agencies to benefit the State's people and to protect, restore, and enhance the natural and human environments.

Regional Water Quality Control Board

The RWQCBs serve as the frontline for State and federal water pollution control efforts. It is composed of nine control boards, each including seven members. Regional boundaries are based on watersheds; and water quality requirements are based on the unique differences in climate, topography, geology, and hydrology for each watershed. Each Regional Board makes critical water quality decisions for its region, including setting standards, issuing waste discharge requirements, determining compliance with those requirements, and taking appropriate enforcement actions. The Project site is located in Region 7, the Colorado River Region.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA), passed in September 2014, is a comprehensive three-bill package that provides a framework for the sustainable management of groundwater supplies by local authorities. The SGMA requires the formation of local groundwater sustainability agencies (GSAs) to assess local water basin conditions and adopt locally based management plans. Local GSAs must be formed by June 30, 2017. The SGMA provides 20 years for GSAs to implement plans and achieve long-term groundwater sustainability and protect existing surface water and groundwater rights. The SGMA provides local GSAs the authority to: (1) require registration of groundwater wells; (2) measure and manage extractions; (3) require reports and assess fees; and (4) request revisions of basin boundaries, including establishing new subbasins. Furthermore, under the SGMA, GSAs responsible for high- and medium-priority basins must adopt groundwater sustainability plans within five to seven years of 2015, depending on whether the basin is in critical overdraft. The DWR has designated the Imperial Valley Basin, which the County overlies, as very low-priority and not in critical overdraft (DWR 2021)

Regional and Local

Colorado River Regional Water Quality Control Board

The Colorado River Basin RWQCB has adopted the Water Quality Control Plan for the Colorado River Basin in accordance with criteria contained in the CWA, Porter-Cologne Act, and other pertinent State and federal rules and regulations. The intent of the Basin Plan is to provide definitive guidelines and give direction to the scope of Colorado River Basin RWQCB activities that will optimize the beneficial uses of the waters of the State within the Colorado River Basin by preserving and protecting the quality of these waters. The intended beneficial use of water determines the water quality objectives. For example, the quality requirements for irrigation water are different from those of drinking water. The Colorado River Basin RWQCB implements the Basin Plan by issuing and enforcing waste discharge requirements for appropriate persons and groups; these can include individuals, communities, or businesses whose waste discharges may affect water quality. These requirements can be either State Waste Discharge Requirements for discharge to land, or federally delegated NPDES permits for discharges to surface water. Discharges are required to meet water quality objectives and protect beneficial uses.

Water Quality Control Plan for the Colorado River Basin

The Water Quality Control Plan for the Colorado River Basin (or Basin Plan) prepared by the Colorado River RWQCB (Region 7) identifies beneficial uses of surface waters within the Colorado River Basin region, establishes quantitative and qualitative water quality objectives for protection of beneficial uses, and establishes policies to guide the implementation of these water quality objectives. Water bodies that have beneficial uses that may be affected by construction activity and post-construction activity include the Imperial Valley Drains (includes the Wistaria Drain and Greeson Wash), New River, and the Salton Sea.

Imperial Integrated Water Resources Management Plan

The Imperial Integrated Regional Water Management Plan (IRWMP) serves as the governing document for regional water planning to meet present and future water resource needs and demands by addressing such issues as additional water supply options, demand management and determination, and prioritization of uses and classes of service provided. In November 2012, the Imperial County Board of Supervisors approved the Imperial IRWMP, and the City of Imperial City Council and the IID Board of Directors approved it in December 2012. Approval by these three stakeholders meets the basic requirement of California DWR for an IRWMP. Through the IRWMP process, IID presented the regional stakeholders' with options in the event long-term water supply augmentation is needed, such as water storage and banking, recycling of municipal wastewater, and desalination of brackish water.

County of Imperial Land Use Ordinance, Title 9

The County's Ordinance Code provides specific direction for the protection of water resources. Applicable ordinance requirements are contained in Division 10, Building, Sewer and Grading Regulations, and summarized below.

Chapter 10 – Grading Regulations. Section 91010.02 of the Ordinance Code outlines conditions required for issuance of a Grading Permit. These specific conditions include:

1. If the proposed grading, excavation, or earthwork construction is of irrigatable land, said grading will not cause said land to be unfit for agricultural use.
2. The depth of the grading, excavation, or earthwork construction will not preclude the use of drain tiles in irrigated lands.
3. The grading, excavation, or earthwork construction will not extend below the water table of the immediate area.
4. Where the transition between the grading plane and adjacent ground has a slope less than the ratio of 1.5 feet on the horizontal plane to 1 foot on the vertical plane, the plans and specifications will provide for adequate safety precautions.

Imperial Irrigation District

The IID is an irrigation district organized under the California Irrigation District Law, codified in Section 20500 et seq. of the California Water Code. Critical functions of IID include diversion and delivery of Colorado River water to the Imperial Valley; operation and maintenance of the drainage canals and

facilities, including those in the Project area; and generation and distribution of electricity. Several policy documents govern IID operations and are summarized below:

- The Law of the River and historical Colorado River decisions, agreements, and contracts
- The Quantification Settlement Agreement and Transfer Agreements
- The Definite Plan, now referred to as the Systems Conservation Plan, which defines the rigorous agricultural water conservation practices being implemented by growers and IID to meet the Quantification Settlement Agreement commitments
- The Equitable Distribution Plan, which defines how IID will prevent overruns and stay within the cap on the Colorado River water rights
- Existing IID standards and guidelines for evaluation of new development and define IID’s role as a responsible agency and wholesaler of water

IID has adopted an Interim Water Supply Policy (IWSP) for Non-Agricultural Projects during the development of the Imperial IWRMP, from which water supplies can be contracted to serve new developments within IID’s water service area. For applications processed under the IWSP, applicants shall be required to pay a processing fee and, after IID board approval of the corresponding agreement, will be required to pay a reservation fee(s) and annual water supply development fees.

Imperial County General Plan

The Water Element and the Conservation and Open Space Element of the General Plan contain goals, objectives, policies, and programs to ensure water resources are preserved and protected. Table 4.8-1 identifies the General Plan goals, objectives, policies, and programs for water quality and flood hazards that are relevant to the Project and summarizes the Project’s consistency with the General Plan. While this EIR analyzes the Project’s consistency with the General Plan pursuant to CEQA Guidelines Section 15125(d), the Imperial County Board of Supervisors ultimately determines consistency with the General Plan.

Table 4.8-1 analyzes the consistency of the Project with specific policies contained in the Imperial County General Plan associated with hydrology and water quality.

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General Plan Policies	Consistency with General Plan	Analysis
<i>Conservation and Open Space Element</i>		
Goal 1 – Environmental resources shall be conserved for future generations by minimizing environmental impacts in all land use decisions and educating the public on their value.	Consistent	A Water Supply Assessment (WSA) has been conducted for the Project site to evaluate the Project’s potential impacts on water resources in the County. The County’s water supply and stability was determined to be adequate for the Project for the next 20 years.

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General Plan Policies	Consistency with General Plan	Analysis
Goal 6 – The County will conserve, protect, and enhance water resources in the County.	Consistent	The Project would protect water quality during construction through compliance with Imperial County design and detention requirements and the NPDES General Construction Permit, as well as preparation and implementation of a Project-specific SWPPP, which will incorporate the requirements referenced in the State Regulatory Framework, design features, and BMPs.
Objective 6.3 – Protect and improve water quality and quantity for all water bodies in Imperial County.	Consistent	The Project would protect water quality during construction through compliance with the NPDES General Construction Permit, SWPPP, and BMPs. The Project will be designed to include site design, source control, and treatment control BMPs. The use of source control, site design, and treatment BMPs would ensure stormwater pollution impacts would not be significant.
Program – Structural development normally shall be prohibited in the designated floodways. Only structures which comply with specific development standards should be permitted in the floodplain	Consistent	The Project does not contain a residential component nor would it place housing or other structures within a 100-year flood hazard area.
Water Element		
Policy – Adoption and implementation of ordinances, policies, and guidelines which assure the safety of County ground and surface waters from toxic or hazardous materials and/or wastes.	Consistent	The Project would preserve ground and surface water quality from hazardous materials and wastes during construction and operation activities. The Project would protect water quality during construction through compliance with NPDES General Construction Permit, SWPPP, which will incorporate the requirements referenced in the State Regulatory Framework and BMPs. The Project will be designed to include site design, source control, and treatment control BMPs. The use of source control, site design, and treatment BMPs would result in a decreased potential for stormwater pollution. It is anticipated that Project decommissioning activities would be subject to similar or more stringent ground and surface water regulations than those currently required.
Program – The County of Imperial shall make every reasonable effort to limit or preclude the contamination or degradation of all groundwater and surface water resources in the County.	Consistent	The Project would preserve ground and surface water quality from hazardous materials and wastes during construction, operation, and decommissioning activities. The Proposed Project would protect water quality during construction through compliance with NPDES General Construction Permit; SWPPP, which will incorporate the requirements referenced in the State Regulatory Framework; and BMPs. The Project

Table Error! No text of specified style in document.-1: General Plan Consistency

General Plan Policies	Consistency with General Plan	Analysis
		will be designed to include site design, source control, and treatment control BMPs. The use of source control, site design, and treatment BMPs would ensure stormwater pollution impacts would not be significant. It is anticipated that project decommissioning activities would be subject to similar or more stringent ground and surface water regulations than those currently required.
Program – All development proposals brought before the County of Imperial shall be reviewed for potential adverse effects on water quality and quantity and shall be required to implement appropriate mitigation measures for any significant impacts.	Consistent	See response above.

4.8.3 Thresholds of Significance

In order to assist in determining whether a project would have a significant effect on the environment, the County utilizes the State CEQA Guidelines Appendix G Guidelines. Appendix G states that a project may be deemed to have hydrology and water quality impacts if it would:

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

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

- Threshold c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:**
 - i) result in substantial erosion or siltation on- or off-site;**

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

 - iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources or polluted runoff; or**

 - iv) impede or redirect flood flows?**

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

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

Please refer to **Section 6.1: Effects Found Not to Be Significant** for an evaluation of those topics that were determined to be less than significant or have no impact and do not require further analysis in the EIR.

4.8.4 Methodology

Dubose Design Group was retained by the County to prepare a WSA for the Project in April 2021. The WSA evaluates water availability during a normal year; water availability during a single-dry and multiple-dry water years; water availability during a 30-year projection to meet existing demands; expected 30-year water demands of the Project; and reasonably foreseeable planned future water demands to be served by the IID. LandMark prepared a Preliminary Geotechnical Report for the Project in August 2020. This report addresses groundwater conditions on the Project site.

Subsurface exploration was performed on July 20, 2020, using Kehoe Testing and Engineering, Inc. to advance three electric CPT soundings to approximate depths of 50 feet below existing ground surface. The soundings were made at the locations shown on the Site and Exploration Plan in Appendix E. The approximate sounding locations were established in the field and plotted on the site map by sighting to discernible site features. Shallow (5-foot-deep) mechanical auger borings (6 inches in diameter) were made in the future laydown yard to the west in order to obtain near-surface soil samples for laboratory analysis.

Groundwater was not noted in the CPT soundings, but LandMark notes groundwater is typically encountered at approximately 8 to 9 feet below ground surface in the vicinity of the Project site. The silts encountered at 18 to 24 feet below ground surface are the water-bearing strata. Groundwater levels may fluctuate with precipitation, irrigation of adjacent properties, site landscape watering, drainage, and site grading.

4.8.5 Project Impact Analysis

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

The Project will share the fire suppression system and the freshwater storage containment pond with HR1. A 500,000-gallon aboveground water tank will be constructed to serve as the primary water supply for the joint fire suppression system for the HR1 and ATLiS sites. Approximately 90,000 g/h of water will be required during Project operations for cooling and additional process needs. Approximately 112 g/h will be required for potable water purposes, including potable washbasin water, eyewash equipment water, water for showers and toilets in crew change quarters, and sink water in the sample laboratory. For these operational water needs, the Applicant is proposing to draw water from the IID "O" lateral. However, a backup delivery line will also be installed from the "N" lateral located about 0.25 mile south of the Project site.

Approximately 56 AFY of water would be needed for fugitive dust control during Project site grading and construction activities, which are anticipated to last up to 2 years. Approximately 3,400 AFY would be required for Project operations, lasting up to 30 years. The Project's total water demand is approximately 3,456 AFY, resulting in 102,112 AF total over the 30-year lifespan of the Project. Construction water requirements represent 0.025 percent of the unallocated supply set aside in the IWSP for non-agricultural projects, while operational water needs represent 14 percent of the unallocated supply set aside in the IWSP for nonagricultural projects (Appendix J).

IID, as a water wholesaler, does not derive any of its supplies from groundwater (IWF 2012). Groundwater underlying the Imperial Valley is generally of poor quality and unsuitable for domestic or irrigation purposes; thus, the IID's only source of water is the Colorado River. Untreated Colorado River water will be supplied to the Project via the "O" Lateral, gate 32 and a new gate and connection via the "N" Lateral. The water supply will be under an IWSP Water Supply Agreement with IID and Schedule 7 General Industrial Use, which sets water rates. The Project will not decrease groundwater supplies or interfere with groundwater recharge; thus, impacts would be less than significant.

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

Water Quality

The Project site is located within the Colorado River Basin Region of the California Regional Water Quality Control Board (CRB RWQCB; RWQCB 2021a). The Project is therefore subject to standards set forth in the CRB RWQCB's Water Quality Control Plan. Through implementation of a SWPPP and a Drainage and Grading Plan, the Project would implement standard industry BMPs and relevant Basin BMPs to control offsite discharges. Additionally, the Project would develop a shared stormwater retention basin with HR1, which would be engineered and constructed to contain any stormwater runoff. Stormwater flows will be directed to the retention basin via ditches, culverts, and/or swales. Stormwater may be allowed to evaporate or percolate into the soil or released for non-Project beneficial use onto the undeveloped portion of the Project parcel; however, the collected stormwater runoff in the basin will be sampled and analyzed for quality and compatibility prior to releasing or removing the runoff from the retention basin.

No process wastewater discharges to land or waters will be associated with the Project; therefore, the Project will meet RWQCB surface discharge requirements consistent with the Waste Discharge Order issued by the CRB RWQCB. Additionally, spill containment areas and sumps subject to spills of immiscible chemicals would be drained to a dilution water tank. Any oil contamination spills would be collected with absorbent pads and disposed as required by law. The Project site would be graded and constructed so that all process spills would drain into area drains that would be reprocessed into the system. Excess process spills would drain into the brine pond.

The Project would not allow any offsite discharges that could violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. The Project would not conflict with or obstruct implementation of the CRB RWQCB's Water Quality Control Plan; therefore, impacts would be less than significant.

Groundwater Management

As mentioned above, the Applicant is proposing to draw water from two IID laterals for the Project's operational water needs. IID, as a water wholesaler, does not derive any of its supplies from groundwater (IWF 2012). Groundwater underlying the Imperial Valley is generally of poor quality and unsuitable for domestic or irrigation purposes; thus, the IID's only source of water is the Colorado River. Untreated Colorado River water will be supplied to the Project via the "O" Lateral, gate 32 and a new gate and connection via the "N" Lateral. Therefore, the Project would not conflict with or obstruct implementation of a groundwater management plan.

4.8.6 Cumulative Impacts

Cumulative impacts are defined in CEQA as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (CEQA Guidelines Section 15355). Stated in another way, "a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing relating impacts" (CEQA Guidelines Section 15130 [a][1]).

As mentioned above, the Proposed Project would not deplete groundwater supplies or interfere substantially with groundwater recharge and therefore would not cumulatively contribute to groundwater deficits. With the implementation of legally required SWRCB, RWQCB, and County policies, plans and ordinances governing land use activities that may degrade or contribute to the violation of water quality standards, the Proposed Project, in combination with approved, proposed, and other reasonably foreseeable projects (Table 3.0-1, Chapter 3.0) in the Imperial watershed and Imperial Valley groundwater basin would not contribute to the cumulative effects of degradation of water quality or result in changes in water runoff patterns. Impacts would be less than cumulatively considerable.

4.8.7 Mitigation Measures

No mitigation measures are required, as all Project impacts regarding hydrology and water quality are less than significant.

4.8.8 Level of Significance After Mitigation

No mitigation measures are required; impacts related to hydrology and water quality would remain less than significant.