Notice of Preparation

To: **Agencies, Organizations, and Interested Parties**

Subject: **Notice of Preparation of a Draft Environmental Impact Report on the Sprinkler Irrigation Water Conservation Incentive Program in Compliance with Title 14, (CEQA Guidelines) Sections 15082(a), 15103, and 15375 of the California Code of Regulations**

The City of Los Angeles Department of Water and Power (LADWP) will be the Lead Agency under the California Environmental Quality Act (CEQA) for the preparation of an Environmental Impact Report (EIR) for the proposed project identified below.

Agencies: We request the views of your agency as to the scope and content of the environmental information which is relevant to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR prepared by LADWP when considering your permit or other approval for the project.

Organizations and Interested Parties: Comments and concerns regarding the environmental issues associated with this project are requested from organizations and individuals.

The description, location, and potential environmental effects of the project are detailed in an Initial Environmental Study available at the following local libraries: Main Library, 168 North Edwards Street, Independence, (760) 878-0260; Bishop Branch, 210 Academy Avenue, Bishop, (760) 873-5115; Lone Pine Branch, 145 West Bush Street, Lone Pine, (760) 876-5031; and Big Pine Branch, 201 North Main Street, Big Pine, (760) 938-2420. Documents related to the proposed project are also available for review at LADWP offices in Bishop (see contact information below). A summary of the project location, description, and potential environmental effects is provided below.

Project Title: Sprinkler Irrigation Water Conservation Incentive Program

Project Location: City of Los Angeles lands in Inyo County leased as pastures for livestock grazing and alfalfa fields that are currently under sprinkler irrigation (approximately 1,989 acres). A portion of the project area (approximately 326 acres) is designated as Enhancement/Mitigation lands.

Project Description: LADWP proposes to implement a water conservation program to promote irrigation efficiency on LADWP lands in Inyo County that are leased as pastures for livestock grazing and alfalfa fields and are irrigated using sprinklers. The program, on a voluntary basis, would allow lessees to receive a financial credit for reducing water use by increasing sprinkler irrigation efficiency. The financial credit would be 5 percent of the rent payment for the land leased with each 0.1 acre-foot per acre (AF/acre) of water conserved below the current allotment of 5 AF/acre. The maximum credit a lessee would be allowed to receive is 75 percent of the total rent, corresponding to 1.5 AF/acre of water conserved. LADWP would provide guidance and assistance for increasing sprinkler irrigation efficiency through non-structural improvements. The program would be implemented by including new provisions in the lease agreements at the time of renewal or in separate water conservation agreements to be signed by LADWP and the lessees.

Potentially Significant Environmental Effects: Based on the results of the Initial Environmental Study, the focus of the EIR will be on environmental impacts to biological resources and hydrology.

The public review period for the Notice of Preparation and the Initial Environmental Study is scheduled

to begin on September 7, 2005 and end on October 6, 2005. Due to the time limits mandated by State law, your response must be sent at the earliest possible date but no later than 30 days after receipt of this notice. Please indicate a contact person in your response, and send your response to the address below:

Mr. Brian Tillemans
City of Los Angeles Department of Water and Power (LADWP)
300 Mandich Street
Bishop, California 93514
Phone: (760) 872-1104
Fax: (760) 873-0266

Scoping Meeting: A public scoping meeting will be held to receive oral comments on the scope and content of the EIR. Written comments will also be accepted at this meeting. The scoping meeting will be held:

Thursday September 15, 2005 at 6:00 p.m.
City of Los Angeles Department of Water and Power (LADWP)
Multi-Purpose Room
300 Mandich Street
Bishop, California 93514

Gene L Coufal
Signature

9/1/05
Date

Gene L. Coufal
Printed Name

Manager, Los Angeles Aqueduct Business Group
Title

Reference: California Code of Regulations, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375.

Los Angeles Department of Water and Power

City of Los Angeles
Department of Water and Power

Initial Environmental Study for the

Sprinkler Irrigation Water Conservation Incentive Program

September 2005

MWH

CITY OF LOS ANGELES
DEPARTMENT OF WATER AND POWER

SPRINKLER IRRIGATION WATER CONSERVATION INCENTIVE PROGRAM

Initial Environmental Study

SEPTEMBER 2005

Prepared by:
MWH
301 North Lake Avenue, Suite 600
Pasadena, California 91101

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Section 1
Project and Agency Information

1.1 PROJECT TITLE AND LEAD AGENCY

Project Title:	Sprinkler Irrigation Water Conservation Incentive Program
Lead Agency Name:	City of Los Angeles Department of Water and Power (LADWP)
Lead Agency Address:	300 Mandich Street, Bishop, CA 93514
Contact Person:	Mr. Brian Tillemans
Contact Phone Number:	(760) 872-1104
Project Sponsor:	Same as Lead Agency

1.2 PROJECT BACKGROUND

LADWP leases approximately 224,000 acres of the land it owns in Inyo County and Mono County, including a total of approximately 19,900 acres of irrigated land as pasture for livestock grazing and alfalfa fields. Under the existing terms of the lease agreements between LADWP and the ranchers/farmers, the lessees receive up to 5 acre-feet (AF) of water per irrigated acre of land per irrigation season. Irrigation season is April to September in the Owens Valley (Inyo County) and May to September in Long Valley (Mono County).

Irrigation water is conveyed from its source, which can be groundwater or surface streams, by a series of canals and ditches. The main canals and ditches branch out and ultimately feed the terminal ditches, which end on and deliver water to the individual leases. Water is then applied to the fields by various irrigation techniques, including sprinklers, flood irrigation, and leveled borders.

Existing terminal ditches and check and diversion structures that control the flows to the leases are maintained by the respective lessees. On-going maintenance activities include removal of vegetation and other obstacles to flow in the ditches and repair or replacement of weathered check and diversion structures. Lessees also install new terminal ditches and related structures on their fields as necessary.

The amount of water needed for optimum irrigation depends on the efficiency of the irrigation technique used. Irrigation techniques using sprinklers allow lessees to irrigate with less than the allotted 5 AF/acre because of the higher efficiency in delivering water to the plants. However, there is currently no incentive for the lessees to use less than the allotted volume of water because the amount of water actually used by a lessee does not affect the rent payment. As a result, lessees typically use the full allotment of 5 AF/acre even if less water is needed to maintain an optimum yield.

1.3 PROJECT OBJECTIVES

Significant amounts of water could be conserved if lessees used only the amount necessary instead of taking the full 5 AF/acre regardless of actual need. To capitalize on this opportunity for water conservation, LADWP is proposing to implement a program to promote irrigation efficiency by ranchers and farmers leasing LADWP lands in Inyo County and currently using sprinkler irrigation.

The objectives of the program are:

- To maintain existing uses in a manner consistent with the requirements for Type E and Enhancement/Mitigation (E/M) project lands
- To promote and reward irrigation efficiency on leased lands
- To increase the amount of water available to the City of Los Angeles from the Los Angeles Aqueduct

1.4 PROJECT LOCATION AND SETTING

The proposed project area is composed of City of Los Angeles lands in Inyo County leased as pastures for livestock grazing and alfalfa fields that are currently under sprinkler irrigation. **Table 1-1** lists the 11 leases that are currently sprinkler irrigated and will be included in the proposed project (a total of approximately 1,989 acres). Four of the leases (totaling approximately 326 acres) are lands designated for E/M projects under the Inyo County/Los Angeles Long-Term Water Agreement (LTWA) and/or the 1991 Environmental Impact Report (1991 EIR) (LADWP, 1991). All of these leases are Type E lands, which are lands that were provided with surface water during the 1981/1982 runoff year. Type E lands are designated in the Green Book, an appendix to the LTWA. Management goals for Type E lands are to avoid causing significant decreases or changes from vegetation conditions that existed on these lands during the 1981-82 runoff year and to avoid significant decreases in water-dependent recreational uses and wildlife habitat. The locations of the leases are shown in **Figure 1-1**.

Located in central California, the project area is a semi-arid region surrounded by the Sierra Nevada Mountains on the west and the White and Inyo Mountains on the east. Communities within the project area include Bishop, Big Pine, Independence, and Lone Pine. The Owens River runs through the middle of the Valley and lands included in the proposed program are located on both sides of the River. Most of the lands are adjacent to open space areas with upland vegetation. In some areas, the agricultural parcels are adjacent to residential development in the communities listed above.

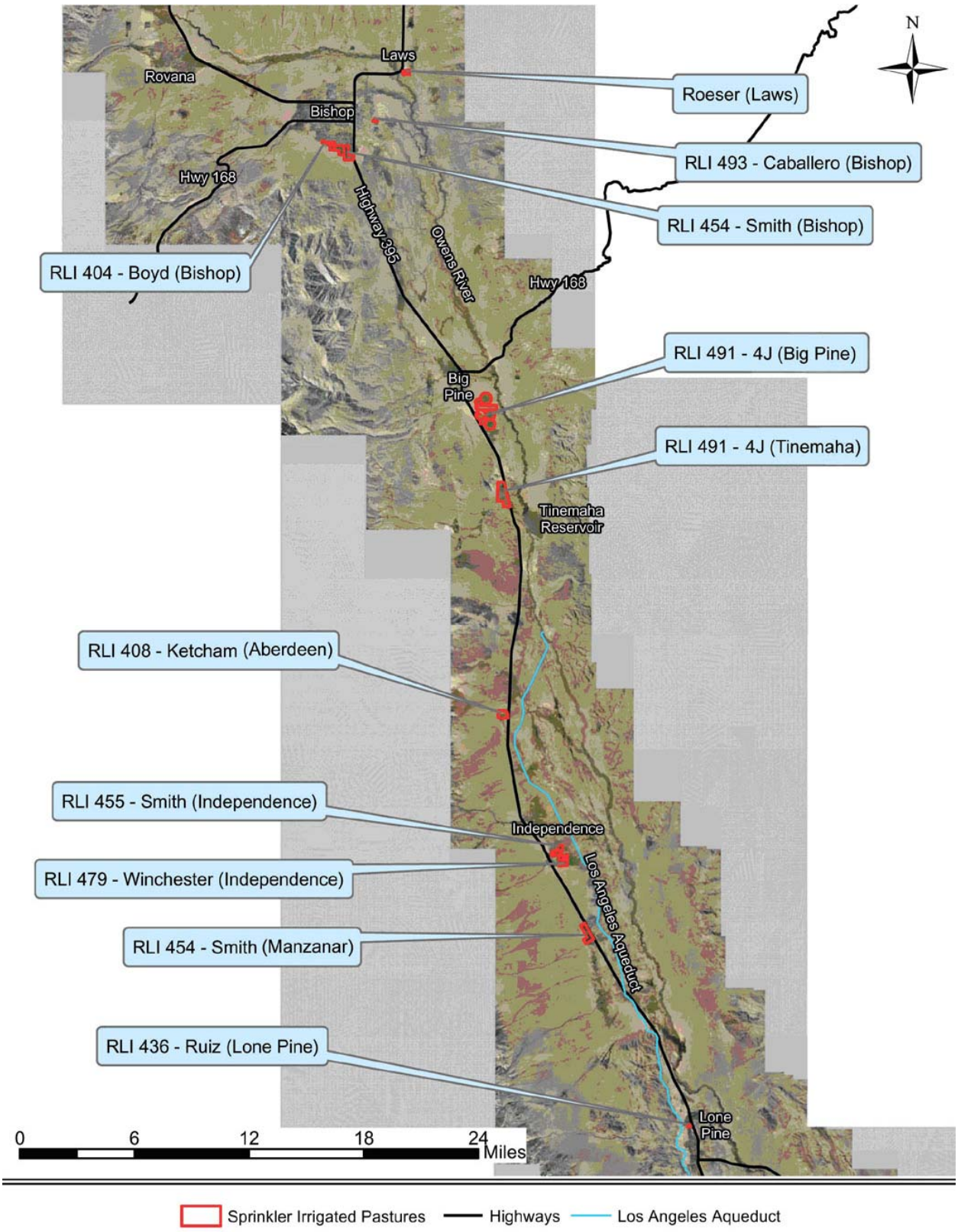
Table 1-1
Leases Included in the Proposed Program

Name of Lessee	Ranch Lease Number	USGS Quad Map	Township / Range / Section	E/M Project Land	Approx. Acreage of Sprinkler Irrigated Areas
Roeser*	*None*	Laws	6S / 33E / 27	X	36
Caballero	RLI 493	Laws	7S / 33E / 05		18
Boyd	RLI 404	Bishop	7S / 32E / 13 7S / 32E / 14		48
Smith	RLI 454	Bishop	7S / 33E / 18 7S / 32E / 13		367
4J	RLI 491	Big Pine	9S / 34E / 20, 21, 28, 29		760
4J	RLI 491	Tinemaha	10S / 34E / 10, 15, 22		315
Ketcham	RLI 408	Aberdeen	12S / 34E / 10 and 15		107
Smith	RLI 455	Independence	13S / 35E / 08 and 17		48
Winchester	RLI 479	Independence	13S / 35E / 17	X	86
Smith	RLI 454	Manzanar	13S / 35E / 33, 34, 03, 04	X	197
Ruiz	RLI 436	Lone Pine	15S / 36E / 28	X	7
				Total	1,989

RLI – Ranch Lease Inyo E/M – Enhancement/Mitigation

* Note: The Roeser lease was recently converted to sprinkler irrigation in September 2005.

Figure 1-1
Project Location



1.5 PROJECT DESCRIPTION

The proposed project is a water conservation program to promote irrigation efficiency on 11 LADWP leases in Inyo County that are under sprinkler irrigation (**Table 1-1**). The program would be implemented by including new provisions, as outlined below, in the lease agreements at the time of renewal or in separate water conservation agreements to be signed by LADWP and the lessees. Participation in the program will be voluntary. LADWP plans to begin implementation of this program by April 1, 2006, in time for the 2006 irrigation season.

The proposed water conservation incentive program would allow lessees to receive a credit based on their rent for implementing water conservation measures. For each 0.1 AF/acre of irrigation water conserved below the 5 AF/acre allotment, the lessee would receive credit equal to 5 percent of their rent. The maximum credit allowed would be equivalent to 75 percent of the rent based on 1.5 AF/acre of water conserved. **Table 1-2** shows the credit a lessee would receive, as a percentage of their rent, corresponding to the amount of water conserved below the 5 AF/acre allotment.

The irrigation efficiency improvements involved in the proposed program would not require physical changes to the pastures/fields such as berming or leveling the fields. Improvements needed to increase efficiency would be limited to switching the type of sprinkler system (e.g., to center pivot from wheel line), reducing the size of sprinkler nozzles, and/or installing moisture sensors to optimize the timing of irrigation. Modifications to the ditches that supply water to these leases are not proposed. LADWP would provide the lessees with assistance in improving irrigation efficiency. This would include seminars by irrigation experts, advice on types and location of sprinkler systems, and use of technology to establish and monitor more efficient irrigation schedules (e.g., soil moisture sensor, etc.).

If all lessees fully participated in the program (i.e., a total of 1,989 acres) and reduced water use to 3.5 AF/acre, up to approximately 2,980 AF/year of water would be conserved. In practice, at least initially, it is estimated that allotments can easily be reduced to 4.5 AF/acre, which would conserve up to approximately 995 AF/year of water.

Table 1-2
Percent Rent Credit Allowed

Irrigation Duty* (AF/acre)	Water Conserved below 5 AF/acre Allotment	Credit as a Percent of Rent
5.0	0.0	0
4.9	0.1	5
4.8	0.2	10
4.7	0.3	15
4.6	0.4	20
4.5	0.5	25
4.4	0.6	30
4.3	0.7	35
4.2	0.8	40
4.1	0.9	45
4.0	1.0	50
3.9	1.1	55
3.8	1.2	60
3.7	1.3	65
3.6	1.4	70
3.5	1.5	75

* Irrigation duty is the amount of water a lessee receives per acre of irrigated land leased from LADWP.

Conditions for participating in this voluntary conservation incentive program are described below. These conditions would be incorporated into the renewed lease agreements or separate water conservation agreements.

- If a lessee applies for and receives a credit under the water conservation program, the lessee would not also receive a "dry finding." [A "dry finding" is an existing arrangement by which a lessee receives a rent reduction when the lessee cannot receive the full allotment during below normal runoff years. The rent reduction associated with a dry finding is much less than the credit a lessee would receive from the proposed water conservation program.]
- When water supply is below normal, irrigated lands that cannot be provided the full 5 AF/acre allotment do not qualify for the water conservation credit. Such lands would only qualify for a "dry finding."
- In above-normal runoff years, if LADWP has made additional water available for irrigation or spreading, credits for water conservation would not be made.
- In order to qualify for a conservation credit, a lessee must maintain vegetation cover at historical levels. As currently practiced, appropriate dust control measures, such as delaying the cultivation of the field until just prior to planting, shall be taken if a portion of an alfalfa field is temporarily fallowed as a part of the normal crop rotation cycle.

[Note: Fallowing is not necessary for maintaining productivity of pastures and therefore is not practiced on pasture lands.]

1.6 OTHER PUBLIC AGENCIES WHOSE REVIEW AND/OR APPROVAL MAY BE REQUIRED

- California Department of Fish and Game (CDFG) – Routine maintenance of irrigation conveyance features within LADWP's system is covered by an existing Master Agreement between CDFG and LADWP (2002). The proposed program would not involve construction or other disturbance to irrigation conveyance features or other water bodies. Therefore, the existing Master Agreement would not apply to the proposed program, and no permitting under Section 1602 of the Fish and Game Code (Streambed or Lakebed Alteration Agreements) is envisioned for the proposed program. However, CDFG is a trustee agency for fish and wildlife under CEQA, and all environmental documents prepared for the proposed program will be provided to CDFG for review.

- U.S. Army Corps of Engineers (COE) – Section 404 of the Clean Water Act authorizes the COE to issue permits for the discharge of dredged or fill material into waters of the United States. However, modification or installation of new facilities into a water of the United States is not proposed as part of this program. Therefore, permitting by the COE would not be required.

- Inyo County Water Department – Under the LTWA, the Technical and Standing Committees review projects for compliance with the Water Agreement. Since this is a water conservation project and is designed to maintain existing uses on the Type E and E/M lands of the 11 leases included in the proposed program, the project is not inconsistent with the LTWA. However, all environmental documents prepared for the proposed program will be provided to the Inyo County Water Department for review.

Section 2
Environmental Analysis

2.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

☐ Aesthetics	☐ Geology and Soils	☐ Noise
☐ Agricultural Resources	☐ Hazards and Hazardous Materials	☐ Population and Housing
☐ Air Quality	☒ Hydrology and Water Quality	☐ Public Services
☒ Biological Resources	☐ Land Use and Planning	☐ Recreation
☐ Cultural Resources	☐ Mineral Resources	☐ Transportation and Traffic
		☐ Utilities and Service Systems

2.2 AGENCY DETERMINATION

On the basis of this initial evaluation:

☐ I find that the project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the applicant. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find that the project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the project, nothing further is required.

Gene L Coufal — 9/1/05

Signature — **Date**

GENE L. COUFAL

Printed Name

L.A. Aqueduct Manager

Title

2.3 ENVIRONMENTAL CHECKLIST

2.3.1 Aesthetics

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

Discussion:

a), b), c), and d) **No Impact**. The project does not involve construction or modification of facilities other than irrigation systems. Since the project would maintain existing uses on leases within the program, irrigated fields will still have the same physical appearance after implementation of the project. No impacts on aesthetics or visual resources would occur.

2.3.2 Agricultural Resources

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒

Discussion:

a) and b) **No Impact.** The proposed project is a water conservation program intended to reduce agricultural water use by improving irrigation efficiency on LADWP lands leased as pastures or alfalfa fields. Participation in the program is voluntary. The program is not intended to achieve water conservation through conversion to non-agricultural land uses. Therefore, the proposed project would not convert farmland to non-agricultural uses and would not conflict with existing zoning for agricultural use. Parcels included in this program are not designated as Prime Farmland, Unique Farmland, Farmland of Statewide Importance (CDC, 2002), or under Williamson Act contracts. No impacts would occur.

c) **No Impact.** The proposed project is a water conservation program intended to reduce agricultural water use by improving irrigation efficiency on LADWP lands leased as pastures or alfalfa fields. Participation in the program is voluntary. The program is not intended to achieve water conservation through increased fallowing, conversion to dry-land farming, conversion to non-agricultural land uses, or other actions that would reduce the total acreage of irrigated lands.

The following provisions (included in the project description) would ensure that the program would not result in reduced acreage of irrigated lands:

1) No financial incentives (rent credits) are offered to reduce water use by more than 1.5 AF/acre below the existing 5 AF/acre allotment.
2) During dry years, irrigated lands that cannot be provided the full 5 AF/acre allotments would not qualify for the rent credits.
3) In order to qualify for the rent credits, program participants must maintain vegetation cover at historical levels on existing irrigated lands.

Therefore, the proposed water conservation program would not result in conversion of farmland to non-agricultural uses. No impact would occur.

2.3.3 Air Quality

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☐	☒

	Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emission which exceed quantitative thresholds for ozone precursors)?	☐	☐	☐	☒
d)	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
e)	Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☒

Discussion:

a) **No Impact.** The project area is located within the Great Basin Valley Air Basin, which is regulated by the Great Basin Unified Air Pollution Control District (GBUAPCD). A project is deemed inconsistent with the applicable air quality plan if it would result in population and/or employment growth that exceeds growth estimated in the applicable air quality plan. The project does not include development of housing or employment centers, and would not induce population or employment growth. Therefore, the project would not conflict with or obstruct the implementation of the applicable air quality plan. No impacts would occur.

b), c) and d) **No Impact.** The Owens Valley area is a non-attainment region for particulate matter less than 10 microns (PM10). The proposed project includes modifications to existing irrigation systems but does not involve construction of new or modified facilities or other activities that would result in land disturbance. However, implementation of the project is anticipated to result in a reduction in the volume of water used on currently sprinkler-irrigated lands in the Owens Valley. The proposed water conservation program is intended to redirect that portion of the irrigation water currently applied to these acres that is applied in excess of plant needs. The program is not intended to achieve water conservation through actions that would result in a reduction in total acreage of irrigated lands, such as increased acreage or frequency of fallowing, conversion to dry-land farming, or conversion to non-agricultural land uses. The provisions listed in **Section 2.3.2(c)** would ensure that the program would not inadvertently promote conversion to dry-land farming or non-agricultural land uses.

An existing provision in the lease agreements requires lessees to notify LADWP of any plans for fallowing. Continued implementation of this provision would enable LADWP to monitor and manage fallowing activities and ensure that the proposed water conservation program does not result in a substantial increase in the frequency or acreage of fallowing and that dust control practices are continued. Therefore, the proposed project would not result in an increase in the acreage of exposed soils or other sources of PM10 emissions.

Per GBUAPCD Rule 502 (Conservation Management Practices) and Rule 307 (Conservation Management Practices Plan Fee), farmers are required to implement and document an annual

plan (Conservation Management Practices (CMP) Plan) to reduce dust emissions from on-farm sources (GBUAPCD, 2005). Farm operators with 40 acres or more outside of residential areas or 10 acres or more within residential areas (5 or more residences within ¼ mile of farm boundaries) of contiguous, or adjacent, farmland are required to prepare and implement CMP Plans for each crop they farm. Specific dust management measures could include water application as soon as feasible after tilling and cessation of tilling during periods of high wind. As applicable, lessees participating in the proposed project would continue to be required to prepare and implement CMP Plans. Participation in the proposed project would not impact the content or implementation of the CMP Plans.

Therefore, based on the above discussion, there would be no project-related impacts on air quality.

e) **No Impact.** Since implementation of the program would result only in less irrigation water use per acre on select lands, the project would not result in creation of objectionable odors. No impacts would occur.

2.3.4 Biological Resources

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☒	☐	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☒	☐	☐	☐
c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☒	☐	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☒	☐	☐	☐

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Discussion:

a) - c) and e) **Potentially Significant Impact.** The irrigation efficiency improvements involved in the proposed program would not require physical modifications of the pastures/fields or irrigation canals/ditches. However, implementation of the program would alter the amount of water supplied to the leases that participate in the program and the amount of water conveyed by the irrigation canals/ditches that supply the leases. Therefore, implementation of the program could have significant impacts on biological resources present in or near the pastures/fields and irrigation ditches/canals if significant resources are present and dependent on existing water regimes. Impacts on biological resources will be further evaluated in the EIR.

d) **No Impact.** Implementation of measures to improve irrigation efficiency does not include construction of new or modified facilities that would impede the movement of fish or wildlife or impeded the use of wildlife nursery sites. No impacts would occur.

f) **No Impact.** Currently, there are no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans for the agricultural parcels and/or irrigation ditches that may be affected by the proposed project. No impacts would occur.

2.3.5 Cultural Resources

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	☒
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

Discussion:

a) – d) **No Impact.** Implementation of the program would involve only minor alterations of existing irrigation systems and therefore would not result in substantial disturbance to the ground or to existing buildings or other structures. Therefore, no impacts on historical, archaeological or paleontological resources or human remains would occur.

2.3.6 Geology and Soils

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☐	☒
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994) creating substantial risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems, where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

Discussion:

a)-i), -ii), -iii), and iv). **No Impact.** The project does not involve construction of habitable or other structures and therefore would not result in an increase in the risk of damage from fault rupture, seismic ground shaking, liquefaction, or landslides. No impacts would occur.

b) **No Impact.** Implementation of the project would result in a reduction in the volume of water used per acre on up to 1,989 acres of LADWP lands in the Owens Valley. The proposed water conservation program is intended to redirect that portion of the irrigation water currently applied to these acres that is applied in excess of plant needs. The program is not intended to achieve water conservation through actions that would result in a reduction in total acreage of irrigated lands, such as increased acreage or frequency of fallowing, conversion to dry-land farming, or conversion to non-agricultural land uses. The provisions listed in **Section 1.5** would ensure that the program would not inadvertently promote conversion to dry-land farming or non-agricultural land uses. As discussed in **Section 2.3.3**, existing dust control measures during agricultural operations would continue to be employed. Therefore, operation of the proposed project is not anticipated to result in additional soil erosion or loss of topsoil. No impacts would occur.

c) **No Impact.** The project does not involve construction of habitable or other structures. Therefore, the project would not result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, and would not expose people or structures to increased risk of damage from any existing unstable geologic units or soils. No impacts would occur.

d) **No Impact.** The project does not involve construction of habitable structures or other structures and therefore would not result in a substantial increase in the risks to life or property from expansive soil. No impacts would occur.

e) **No Impact.** No septic tanks or alternative wastewater disposal systems would be required for the project. No impacts would occur.

2.3.7 Hazards and Hazardous Materials

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h) Expose people or structures to the risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

Discussion:

a), b), and c) **No Impact.** The proposed project would not require use, transport or disposal of hazardous materials. No impacts from routine transport, use, storage, disposal of, or upset and accident conditions involving hazardous materials would occur.

d) **No Impact.** Section 65962.5 of the California Government Code requires the California Environmental Protection Agency to update a list of known hazardous materials sites, which is also called the "Cortese List." The Cortese List identifies public drinking water wells with detectable levels of contamination, hazardous substance sites selected for remedial action, sites with known toxic material identified through the abandoned site assessment program, reported leaking underground storage tanks, and solid waste disposal facilities from which there is known hazardous substance migration. California Department of Toxic Substances Control (DTSC) is responsible for preparing a portion of the information that comprises the Cortese List. A review of DTSC's database indicates that there are no DTSC Cortese List sites in Inyo County (DTSC, 2005). The 11 leases included in the proposed program are not known by LADWP (the property owner) to be listed on the Cortese List or otherwise be located on a hazardous materials site. In addition, implementation of the program would involve only minor alterations of existing irrigation systems and therefore would not result in substantial disturbance to the ground. Therefore, implementation of the program would not create a hazard to the public or the environment associated with disturbance of a hazardous materials site.

e) and f) **No Impact.** Potential project sites are dispersed over a large area, which includes several public and private airports. However, the project does not involve construction of housing or creation of employment and therefore would not result in placement of people near these airports. Furthermore, the project does not involve structures that might interfere with the operation of the airports or air traffic. Therefore, the project would not result in

exposure of people residing or working in the project area to safety hazards associated with the airports. No impacts would occur.

g) **No Impact.** The proposed project would not result in changes in access to any property, and would not increase the potential for hazards within the area. Therefore, the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. No impacts would occur.

g) **No Impact.** The project would be implemented on existing agricultural fields; no wildlands would be impacted. Since adequate vegetation cover and soil moisture would be maintained on lands included in the proposed program, there would be no increase in fire hazard. No impacts would occur.

2.3.8 Hydrology and Water Quality

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☒	☐	☐	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☐	☒
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☐	☒
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐
g) Place housing within a 100-year flood hazard area, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒

	Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
i)	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j)	Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

Discussion:

a) and f) **Less than Significant Impact.** The project is a water conservation program for irrigated pastures and alfalfa fields. No waste discharge requirements are relevant for the project. Construction in natural water bodies or other water conveyance features is not included in the proposed program. The program would result in changes in the depth of water within some conveyance features, which could result in minor temperature changes. This impact is anticipated to be less than significant, but water quality impacts would be discussed further in the EIR.

b) **Potentially Significant Impact.** Under existing conditions (with less efficient irrigation), some of the applied water may run off as return flows, some of the water ponds in low areas and evaporates, and some of the water percolates to groundwater – with respective volumes varying by crop type, topography, and site-specific soil conditions. Some percolation to groundwater also occurs from the irrigation water conveyance features (creeks and ditches). Implementation of the proposed program would alter the amount of percolation from the pastures/fields and water conveyance features associated with the participating leases. The net effect on groundwater levels will depend on the specific participation levels of lessees and lease-specific conditions, but could be a significant impact. Impacts on groundwater resources will be further evaluated in the EIR.

c) and d) **No Impact.** The project includes minor modification of existing irrigation systems. No construction of structures or other physical modifications that would alter the existing drainage pattern are proposed. No impacts would occur.

e) **No Impact.** The proposed project is a water conservation program. The proposed project would not result in any new or additional discharges of runoff to the stormwater drainage system and would not contribute to additional sources of polluted runoff. No impacts would occur.

g) **No Impact.** The project does not involve construction of housing. Therefore, no impacts would occur.

h) **No Impact.** The general project area includes 100-year flood hazard areas along the Owens River, its tributary streams, and the Los Angeles Aqueduct. However, the project does not involve placement of habitable buildings or new structures that would impede or redirect flood flows. No impacts would occur.

i) and j) **No Impact.** The project does not involve construction of habitable or other structures, and does not involve construction or modification of levees or dams. Therefore, the project does not have the potential to expose people or structures to a significant risk of loss, injury, or death involving flooding or inundation by seiche, tsunami, or mudflow. No impacts would occur.

2.3.9 Land Use and Planning

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

Discussion:

a) **No Impact.** The project does not involve construction of facilities or changes in land use that could disrupt the physical arrangement of an established community or isolate an existing land use. No impacts would occur.

b) **No Impact.** The proposed project is a irrigation water conservation program. The project does not involve substantial physical modifications, and would not result in any change in land use. Therefore, the project would not conflict with any applicable land use plan, policy, or regulation. No impacts would occur.

c) **No Impact.** Currently, there are no adopted habitat management or conservation plans applicable to the project area. No impacts would occur.

2.3.10 Mineral Resources

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

Discussion:

a) and b) **No Impact.** The project would occur exclusively on existing agricultural fields and would not change existing uses. Therefore, the project would not have any effect on the availability of mineral resources.

2.3.11 Noise

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	☒
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Discussion:

a) **No Impact.** The proposed project includes minor modification of existing irrigation systems but does not involve any construction or other activities that would generate noise. No impacts would occur.

b) **No Impact.** The proposed project does not involve any activities that would generate groundborne vibration or groundborne noise. No impacts would occur.

c) **No Impact.** New pumps or other motorized equipment would not be required for project operation. Implementation of the project would not create any permanent noise sources and therefore would not result in a substantial permanent increase in ambient noise levels in the project vicinity. No impacts would occur.

d) **No Impact.** The proposed project does not involve any activities that would generate temporary or periodic increases in ambient noise levels. No impacts would occur.

e) and f) **No Impact.** Potential project sites are dispersed over a large area, which includes several public and private airports. However, the project does not involve construction of housing or creation of employment and therefore would not result in exposure of people residing or working in the project area to excessive noise levels associated with airports. No impacts would occur.

2.3.12 Population and Housing

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion:

a) **Less than Significant Impact.** The proposed project does not involve construction of new homes or businesses and does not include construction of new, potentially growth-inducing, infrastructure such as roads or potable water or wastewater systems. The project is a water conservation program which involves providing financial incentives to increase irrigation

efficiency. The project would not result in conversion of agricultural lands to other uses. Therefore, the project would not, either directly or indirectly, induce substantial population growth in the project area. No impacts on population and housing would occur in the project area.

The proposed program would result in an increase in the amount of water available to the City of Los Angeles from the Los Angeles Aqueduct. However, the project does not include new water treatment capacity or installation of any new infrastructure to deliver additional water supplies. Therefore, any additional water volume conveyed in the Los Angeles Aqueduct is not anticipated to be substantially growth inducing. The impact is less than significant on population and housing in the City of Los Angeles.

b) **No Impact.** No housing would be displaced by the proposed project. Therefore, no impacts would occur.

c) **No Impact.** No individuals would be displaced by the proposed project. Therefore, no impacts would occur.

2.3.13 Public Services

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?	☐	☐	☐	☒
ii) Police protection?	☐	☐	☐	☒
iii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☐	☒
v) Other public facilities?	☐	☐	☐	☒

Discussion:

a)-i), -ii), -iii), -iv), and v) **No Impact.** The project does not involve construction of housing or other structures that would result in a substantial increase in the demand for fire protection, emergency medical services, police protection, schools, parks, or other public services. No new or physically altered facilities for these public services would be required. No impacts would occur.

2.3.14 Recreation

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Discussion:

a) **No Impact.** The proposed project does not involve construction of housing or other structures that would result in an increase in the use of existing parks or other recreational facilities. Therefore, no impacts would occur.

b) **No Impact.** The proposed project does not include recreational facilities or involve the construction of housing that would require the expansion of existing recreational facilities. No impacts would occur.

2.3.15 Transportation and Traffic

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	☐	☐	☒	☐
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e) Result in inadequate emergency access?	☐	☐	☐	☒

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Result in inadequate parking capacity?	☐	☐	☐	☒
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	☐	☐	☐	☒

Discussion:

a) and b) **Less than Significant Impact.** Under existing conditions, LADWP staff and lessees travel to the leases periodically. The project could result in a minor increase in vehicle trips by lessees for turning on and off irrigation systems more frequently than under existing conditions. Impacts on existing traffic or street system would be less than significant.

c) **No Impact.** The project does not involve any activities that would result in a change in air traffic patterns or an increase in air traffic levels. No impacts would occur.

d) **No Impact.** The project does not involve any changes to a design feature or use of a roadway. No impacts would occur.

e) **No Impact.** The project would not require any lane or road closures and would not result in changes to access to any property. No impacts on emergency access would occur.

f) **No Impact.** The project would not cause a permanent increased demand for parking or have any impact on existing parking facilities. No impacts would occur.

g) **No Impact.** The project would not result in any long-term increase in traffic or in a permanent change in existing transportation systems. Therefore, the project would not conflict with adopted policies, plans, or programs supporting alternative transportation. No impacts would occur.

2.3.16 Utilities and Service Systems

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☒
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	☒
g) Comply with federal, state, and local statues and regulations related to solid waste?	☐	☐	☐	☒

Discussion:

a) **No Impact.** The project would not require any new connections to the existing sewer system and would have no impact on existing wastewater treatment systems. No impacts would occur.

b) **No Impact.** The project is a water conservation program, and therefore would not generate any new demand for water or wastewater treatment. No impacts would occur.

c) **No Impact.** The project would not generate any additional runoff and would not require or result in construction of new stormwater drainage facilities or expansion of existing facilities. No impacts would occur.

d) **No Impact.** The project is a water conservation program, and therefore would not generate any new demand for water supplies. No new or expanded entitlements would be required. No impacts would occur.

e) **No Impact.** The project is a water conservation program, and therefore would not generate any new demand for wastewater treatment services. No impacts on wastewater treatment capacity would occur.

f) and g) **No Impact.** The project is a water conservation program involving minor alterations to existing irrigation systems, and therefore would not generate any new demand for waste management services or substantial volumes of solid waste. No impacts on landfill capacity or solid waste would occur.

2.3.17 Mandatory Findings of Significance

	Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b)	Does the project have impacts that are individually limited, but cumulatively considerable ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, effects of other current projects, and the effects of probable future projects.)?	☒	☐	☐	☐
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

Discussion:

a) **Potentially Significant Impact.** As discussed above in **Section 2.3.4**, the proposed project would alter the amount of irrigation water supplied to leases that participate in the program and would also alter the amount of water conveyed by the ditches/canals supplying the leases. Therefore, this potentially significant impact on biological resources will be further evaluated in the EIR. As discussed above in **Section 2.3.5**, the proposed project is not anticipated to have any effect on cultural resources.

b) **Potentially Significant Impact.** The main effect of the project, water conservation, is beneficial. This project, along with water conservation efforts within the City of Los Angeles, would be cumulatively beneficial in regard to water supplies. However, cumulative impacts on groundwater and biological resources will be evaluated in the EIR.

c) **No Adverse Impact (Beneficial Impact).** As described above, the proposed project would not have a substantial adverse effect on human beings. The main effect of the project, water conservation, is beneficial to human beings.

Section 3
Report Preparation

3.1 REFERENCES

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3.2 ACRNOYMS AND ABBREVIATIONS

AF	acre-feet
CDC	California Department of Conservation
CDFG	California Department of Fish and Game
CEQA	California Environmental Quality Act
COE	United States Army Corps of Engineers
DTSC	California Department of Toxic Substance Control
E/M	Enhancement/Mitigation
EIR	Environmental Impact Report
GBUAPCD	Great Basin Unified Air Pollution Control District
LADWP	City of Los Angeles Department of Water and Power

LTWA	Inyo County/Los Angeles Long-Term Water Agreement
PM10	particulate matter less than 10 microns
USGS	United States Geological Survey

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