

SECTION 3.15

Environmental Justice

3.15 Environmental Justice

3.15.1 Introduction and Summary

This analysis was prepared in compliance with Presidential Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* (EO 12898), dated February 11, 1994. The purpose of this analysis is to determine whether disproportionately high and adverse human health or environmental effects of the Proposed Project or Alternatives are likely to fall on minority and/or low-income populations. This analysis focuses on the locations of high and adverse impacts (as reported in the various environmental analysis sections of this EIR/EIS) and examines the racial and income characteristics of the populations affected by these impacts. This analysis also discusses the specific outreach efforts made to involve minority and low-income populations in the decision-making process.

No high and adverse impacts would occur in the MWD service area, SDCWA service area, or LCR subregions; therefore, these subregions are not included in the impact discussions below. Refer to the IA EIS for further details on minority and low-income populations in the LCR subregion. Table 3.15-1 summarizes the high and adverse effects that could result in environmental justice issues with implementation of the Proposed Project and Alternatives.

TABLE 3.15-1
Summary of Environmental Justice Issues

Proposed Project: 300 KAFY All Conservation Measures	Alternative 1: No Project	Alternative 2: 130 KAFY On-farm Irrigation System Improvements Only	Alternative 3: 230 KAFY All Conservation Measures	Alternative 4: 300 KAFY Following Only
LOWER COLORADO RIVER				
No impacts.	Same as Baseline condition.	No impacts.	No impacts.	No impacts.
IID WATER SERVICE AREA AND AAC				
Impact EJ-1: Environmental Justice Effects from Net Loss of up to 2,630 Jobs from Following under Conservation Program, IOP, and the HCP.	Environmental Justice Effects from Baseline Levels of Following.	Impact A2-EJ-1: Environmental Justice Effects from Net Loss of 1,530 Jobs from Following under IOP and the HCP.	Impact A3-EJ-1: Environmental Justice Effects from Net Loss of 3,420 Jobs from Following under Conservation Program, IOP, and the HCP.	Same as EJ-1.

TABLE 3.15-1
Summary of Environmental Justice Issues

Proposed Project: 300 KAFY All Conservation Measures	Alternative 1: No Project	Alternative 2: 130 KAFY On-farm Irrigation System Improvements Only	Alternative 3: 230 KAFY All Conservation Measures	Alternative 4: 300 KAFY Following Only
SALTON SEA				
Impact EJ-2: Environmental Justice Effects from Windblown Dust as a Result of Sea Level Decline of about 5 to about 15 feet after year 2035. With imple- mentation of the HCP-SS, the decline would be 5 feet by year 2077.	Environmental Justice Effects from Windblown Dust as a Result of Baseline Sea Level Decline of about 7 feet.	Impact A2-EJ-2: Environmental Justice Effects from Windblown Dust as a Result of Sea Level Decline of about 7 feet after year 2035.	Impact A3-EJ-2: Environmental Justice Effects from Windblown Dust as a Result of Sea Level Decline of about 4 to 12 feet after year 2035.	Impact A4-EJ-2: Environmental Justice Effects from Windblown Dust as a Result of Sea Level Decline of up to 6 feet after year 2035.
SDCWA SERVICE AREA				
No impacts.	Same as Baseline condition.	No impacts.	No impacts.	No impacts.
CVWD SERVICE AREA				
Impact EJ-3: Environmental Justice Effects from Windblown Dust as a Result of Sea Level Decline. With implemen- tation of the HCP- SS, the decline would be 5 feet by year 2077.	Environmental Justice Effects from Windblown Dust as a Result of Baseline Sea Level Decline of about 7 feet.	Impact A2-EJ-3: Environmental Justice Effects from Windblown Dust as a Result of Sea Level Decline.	Impact A3-EJ-3: Environmental Justice Effects from Windblown Dust as a Result of Sea Level Decline.	Impact A4-EJ-3: Environmental Justice Effects from Windblown Dust as a Result of Sea Level Decline.
MWD SERVICE AREA				
No impacts.	Same as Baseline Condition.	No impacts.	No impacts.	No impacts.

3.15.2 Regulatory Framework

3.15.2.1 Federal Regulations and Standards

EO 12898, “Federal Actions to Address Environmental Justice in Minority and Low-Income Populations” issued by President Clinton in 1994, provides that “each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations.” In the

accompanying memorandum, President Clinton urged federal agencies to incorporate environmental justice principles into analyses prepared under the NEPA and emphasized the importance of public participation in the NEPA process.

The President's Council on Environmental Quality (CEQ) has oversight of the federal government's compliance with EO 12898 and NEPA. CEQ, in consultation with EPA and other affected agencies, has developed a guidance document (Environmental Justice Guidance Under the National Environmental Policy Act, CEQ 1997) to further assist federal agencies with their NEPA procedures so that environmental justice concerns are effectively identified and addressed.

Neither EO 12898 nor CEQ 1997 prescribes any specific format for examining environmental justice. Instead, CEQ 1997 recommends that agencies "integrate analyses of environmental justice concerns in an appropriate manner so as to be clear, concise, and comprehensible within the general format suggested by 40 CFR 1502.10."

CEQ 1997 contains several general guiding principles to consider when examining environmental justice concerns and when making determinations as to whether there may be disproportionately high and adverse human health or environmental effects on minority populations, low-income populations, or Indian tribes. These principles recommend that Federal agencies investigate the demographic composition of the affected area; consider relevant public health data and industry data concerning the potential for multiple or cumulative exposure to human health or environmental hazards; consider the interrelated cultural, social, occupational, historical, or economic factors that could amplify the natural and physical environmental effects of the proposed agency action; develop effective public participation strategies that lead to meaningful community representation in the decision-making process; and finally, seek tribal representation in the process in a manner that is consistent with the government-to-government relationship between the US and tribal governments, the federal government's trust responsibility to federally recognized tribes, and any treaty rights.

In addition to these guiding principles, CEQ 1997 also highlights the following key consideration:

Under NEPA, the identification of a disproportionately high and adverse human health or environmental effect on a low-income population, minority population, or Indian tribe does not preclude a proposed agency action from going forward, nor does it necessarily compel a conclusion that a proposed action is environmentally unsatisfactory. Rather, the identification of such an effect should heighten agency attention to Alternatives (including alternative sites), mitigation strategies, monitoring needs, and preferences expressed by the affected community or population.

3.15.3 Environmental Setting

3.15.3.1 IID Water Service Area and AAC

High and adverse impacts that could result in environmental justice effects would occur in the IID water service area as a result of following with implementation of the water conservation program under the Proposed Project, Alternative 3, and Alternative 4. Such impacts in the IID water service area would also occur as a result of following with

implementation of the Salton Sea Habitat Conservation Strategy and the IOP under the Proposed Project and all of the Alternatives.

Census data were collected for the IID water service area. The population in the IID water service area is approximately 51 percent racial minority, 76 percent Hispanic origin, and 24 percent low-income. (Note that the Bureau of the Census defines Hispanic origin as an ethnicity and not a race. Consequently, a person of Hispanic origin may be of any race, and as such the Bureau of Census reports these characteristics separately. The CEQ 1997 definition of minority includes Hispanic origin along with other race categories. To prevent double counting when examining minority populations, this analysis reviews racial minorities separately from Hispanics. Thus, the percentages for racial minorities and Hispanics are not additive.)

Farm laborers, which are a predominantly low-income, minority population group, also comprise a substantial component of the overall population demographics within the subregion. Due to lack of data, it is not possible to determine the exact racial and income characteristics of this affected population. It is, however, reasonable to assume that this affected population would have high percentages of minority (i.e., Hispanic) and low-income individuals.

3.15.3.2 Salton Sea

Based on the technical analysis performed in this EIR/EIS, the only high and adverse impact in the Salton Sea subregion is on air quality as a result of the exposed Salton Sea shoreline (see Section 3.7, Air Quality). For the purposes of this analysis, census data were collected for two impact areas: (Scenario 1) a 1-mile setback around the Sea from its existing shoreline at the time that the NOP for the Draft EIR/EIS was published to determine localized impacts; and (Scenario 2) the boundaries of the SSAB (see Figure 3.7-4 in Section 3.7, Air Quality) to determine regional impacts. Refer to Section 3.15.4.1, Methodology, for additional information on the rationale for defining these two impact areas.

Under Scenario 1, the population affected by this potentially high and adverse impact is approximately 41 percent racial minority, 57 percent Hispanic, and 29 percent low-income. Under Scenario 2, the population affected by this potentially high and adverse impact is approximately 38 percent racial minority, 54 percent Hispanic, and 18 percent low-income.

3.15.3.3 CVWD Service Area

Based on the technical analysis performed in this EIR/EIS, two high and adverse impacts could occur in the CVWD service area. With regard to the high and adverse impact on air quality as a result of the exposed Salton Sea shoreline, this impact is discussed under the “Salton Sea” since the CVWD service area falls within the boundaries described as the Salton Sea subregion for the purposes of this analysis under Scenario 2.

In addition to the air quality impact mentioned above, additional impacts could result from CVWD’s receipt and use of the conserved water to be transferred by IID under the Proposed Project (QSA Implementation scenario). These impacts are being addressed in the Draft CVWD Water Management PEIR (see Section 1.5.4), which is being prepared by CVWD. However, because that PEIR is not yet available, this EIR/EIS provides information on potential environmental justice effects from CVWD’s proposed receipt and use of the

conserved water. According to CVWD's most recent, programmatic analysis, the TDS content of drinking water in certain areas within the CVWD service area would exceed secondary (i.e., aesthetic) drinking water standards, based on their proposed use of the conserved water. The approximate boundary of this high and adverse impact to drinking water was identified by CVWD as the boundaries of La Quinta, Bermuda Dunes, Thermal, Mecca, Dike 4, the Oasis Irrigation Area, and the Martinez Canyon Recharge Site, which is located within the Oasis Irrigation Area (see Figure 3.15-1). The affected population was determined to be approximately 30 percent racial minority, 38 percent Hispanic, and 21 percent low-income.

3.15.3.4 Aggregate Environmental Justice Study Area

For this analysis, an aggregate environmental justice study area was established to ensure that later findings on the race and income compositions of affected populations would be reviewed in context. The aggregate study area comprised the approximate boundaries of the IID water service area and the SDCWA, CVWD, and MWD service areas. This large aggregate boundary was considered an appropriate area for this analysis since both the impacts and the benefits of the Proposed Project and Alternatives would generally be confined to the area within this boundary.

Based on a GIS analysis of the Census Block Groups within the aggregate study area, it was determined that the year 2000 population of the study area was approximately 16,779,062. Of this total, approximately 43 percent of the population were racial minority, and approximately 38 percent were of Hispanic origin.

At the time this analysis was conducted, the year 2000 census data on income were not yet released. As a substitute, 1990 Census data on income were used. The 1990 population of the study area was approximately 15,207,555. Of this total, approximately 13 percent of the population were low-income.

3.15.4 Impacts and Mitigation Measures

3.15.4.1 Methodology

The guiding principles contained in CEQ 1997 were used to develop the methodology for this environmental justice analysis. This section describes this methodology, and also identifies the key provisions of CEQ 1997 that were used in the development of this methodology.

CEQ 1997 contains the following definitions of Minority and Minority Population:

Minority: *Individual(s) who are members of the following population groups: American Indian or Alaskan Native; Asian or Pacific Islander; Black, not of Hispanic origin; or Hispanic.*

Minority Population: *Minority populations should be identified where either:*

- (a) *the minority population of the affected area exceeds 50 percent; or*
- (b) *the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis.*

In identifying minority communities, agencies may consider as a community either a group of individuals living in geographic proximity to one another, or a geographically dispersed/transient set of individuals (such as migrant workers or Native American), where either type of group experiences common conditions of environmental exposure or effect. The selection of the appropriate unit of geographic analysis may be a governing body's jurisdiction, a neighborhood, census tract, or other similar unit that is to be chosen so as to not artificially dilute or inflate the affected minority population. A minority population also exists if there is more than one minority group present and the minority percentage, as calculated by aggregating all minority persons, meets one of the above-stated thresholds.

CEQ 1997 contains the following definition of Low-Income Population:

Low-income Population: *Low-income populations in an affected area should be identified with the annual statistical poverty thresholds from the Bureau of the Census' Current Population Reports, Series P-60 on Income and Poverty. In identifying low-income populations, agencies may consider as a community either a group of individuals living in geographic proximity to one another, or a set of individuals (such as migrant workers or Native Americans), where either type of group experiences common conditions of environmental exposure or effect.*

CEQ 1997 contains the following guidance on the terms “disproportionately high and adverse human health and environmental effects” and how to make these determinations:

Disproportionately High and Adverse Human Health Effects: *When determining whether human health effects are disproportionately high and adverse, agencies are to consider the following three factors to the extent practicable:*

- (a) *Whether the health effects, which may be measured in risks and rates, are significant (as employed by NEPA), or above generally accepted norms. Adverse health effects may include bodily impairment, infirmity, illness, or death; and*
- (b) *Whether the risk or rate of hazard exposure by a minority population, low-income population, or Indian tribe to an environmental hazard is significant (as employed by NEPA) and appreciably exceeds or is likely to appreciably exceed the risk or rate to the general population or other appropriate comparison group; and*
- (c) *Whether health effects occur in a minority population, low-income population, or Indian tribe affected by cumulative or multiple adverse exposures from environmental hazards.*

Disproportionately High and Adverse Environmental Effects: *When determining whether environmental effects are disproportionately high and adverse, agencies are to consider the following three factors to the extent practicable:*

- (a) *Whether there is or will be an impact on the natural or physical environment that significantly (as employed by NEPA) and adversely affects a minority population, low-income population, or Indian tribe. Such effects may include ecological, cultural, human health, economic, or social impacts on minority communities, low-income communities, or Indian tribes when those impacts are interrelated to impacts on the natural or physical environment; and*
- (b) *Whether environmental effects are significant (as employed by NEPA) and are or may be having an adverse impact on minority populations, low-income populations, or Indian tribes that appreciably exceeds or is likely to appreciably exceed those on the general population or other appropriate comparison group; and*

- (c) *Whether the environmental effects occur or would occur in a minority population, low-income population, or Indian tribe affected by cumulative or multiple adverse exposures from environmental hazards.*

The environmental justice analysis was conducted in two steps. These steps are described below:

1. The first step in this environmental justice analysis was to identify whether there were any high and adverse impacts as a result of the Proposed Project or Alternatives. The series of environmental analyses prepared for this EIR/EIS were reviewed, and discussions with the environmental professionals who prepared these studies were conducted to determine which environmental or human health impacts would remain high and adverse after proposed mitigation measures were implemented. Based on this review, it was determined that the Proposed Project and one or all of the Alternatives would result in potentially high and adverse air quality impacts in the Salton Sea subregion (Section 3.7), drinking water impacts in the CVWD service area (Table 3.1-2 in Section 3), and socioeconomic impacts in the IID water service area (Section 3.14)¹. Further, it was determined that these impacts would remain potentially high and adverse even after proposed mitigation measures were implemented. Each of these impacts is described in greater detail below in Sections 3.15.4.2 through 3.15.4.6 and in the individual resource area sections.
2. In the second step of the analysis, the geographic locations of these high and adverse impacts were overlaid with census data on race and income using GIS and other calculations to determine if minority or low-income populations existed within these high and adverse impact areas (see Section 3.15.3). If minority or low-income populations were found to exist within these high and adverse impact areas, a determination was then made as to whether these populations were receiving an adverse impact that appreciably exceeded the magnitude of similar impacts that were occurring in other parts of the Project's region of influence. If such an excess impact was identified, the specific impact being reviewed would then be described as having a disproportionately high and adverse effect on minority and/or low-income populations.

Thresholds for Identification of Minority and Low-income Populations. As described in Section 3.15.3.4, an aggregate study area was established to ensure that later findings on the race and income compositions of affected populations would be reviewed in context. The aggregate study area comprised the approximate boundaries of the IID water service area as well as the SDCWA, CVWD, and MWD service areas.

As described above, the second step of the environmental justice analysis involves an examination of the race and income characteristics of the populations that would be affected by high and adverse impacts. Using the CEQ 1997 definition of a minority population as a guide, a statistical analysis was conducted on Census data from the aggregate study area to set a threshold for identification of minority and low-income populations appropriate for this analysis. Based on this statistical analysis, the threshold was set at 50 percent for both minority populations and Hispanic-origin populations. An affected population would

¹ Because the significant, unavoidable agricultural resources impact would only directly affect agricultural land rather than human populations, this impact was not considered in this analysis. The indirect socioeconomic impact that would occur as a result of the agricultural resources impact is evaluated.

therefore have to be greater than 50 percent minority or Hispanic to be considered a minority population for this analysis. A similar statistical analysis was conducted to set a threshold for identification of a low-income population appropriate for this analysis. The low-income population threshold was set at 37 percent. An affected population would therefore have to be greater than 37 percent low-income to be considered a low-income population for this analysis. These thresholds were used to determine whether minority and/or low-income populations exist in the impact areas that are defined in Section 3.15.3.

Outreach to Minority and Low-income Populations. Both EO 12898 and the guidance contained in CEQ 1997 require federal agencies to ensure meaningful participation of minority and low-income populations in the decision-making process. Consequently, a key component of compliance with EO 12898 is outreach to the potentially affected minority and/or low-income population, which could uncover issues of importance that may not otherwise be apparent. This section describes the outreach efforts made by the Lead Agencies to involve the public, including minority and low-income populations, in the decision-making process.

As described in Section 1 of this EIR/EIS, copies of the EIR/EIS were made available at several public locations. These include local libraries in the potentially affected region of influence, on the IID Public Web Site, Reclamation and IID offices. All of these locations were identified in a Public Notice of Availability that was published in the following newspapers: Desert Sun, Imperial Valley Press, and San Diego Union Tribune. The Notice of Availability was also published in a local Spanish newspaper: El Sol Del Valle. Hardcopies and/or CD-ROM versions of the Draft EIR/EIS were also available by request from IID and Reclamation.

In accordance with NEPA, public scoping meetings were held with the general public to identify the scope of the environmental analysis of the EIR/EIS and to identify significant issues that should be addressed in the EIR/EIS. Six public scoping meetings were conducted between October 12 and October 20, 1999 to solicit input from the public on potential environmental impacts, the significance of impacts, the appropriate scope of the environmental assessment, proposed mitigation measures, and potential Alternatives to the Proposed Project. In addition, after release of the Draft EIR/EIS in January 2002, three public hearings were conducted on April 2, 3, and 4 to receive comments on the adequacy of the environmental document. The Notice of Intent and Notice of Preparation were made available at the public scoping meetings in both English and Spanish. Notices of the occurrence of all public meetings were published in both English and Spanish newspapers and a Spanish interpreter was present at the El Centro and La Quinta public meetings.

Agency coordination meetings were also held with Cooperating, Responsible, and Trustee Agencies (as defined by NEPA and CEQA), as well as with the Native American Tribes that could be affected by the direct and/or indirect affects of the federal actions associated with the Proposed Project and Alternatives in April 2000. Subsequent consultation meetings have been held with the Torres Martinez Indian Tribe.

Subregions and Significant Impacts Excluded from Impact Analysis. No high and adverse impacts would occur in the SDCWA service area, MWD service area, or LCR subregions; therefore, these subregions are not included in the impact discussions below. Refer to the IA EIS for further details on minority and low-income populations in the LCR subregion.

3.15.4.2 Proposed Project

IID WATER SERVICE AREA AND AAC

Impact EJ-1: Environmental Justice Effects from Net Loss of up to 2,630 Jobs from Fallowing under Conservation Program, IOP, and the HCP. As described in Section 3.14, Socioeconomics, the potential fallowing of agricultural land under the Proposed Project would result in the loss of agricultural jobs. From a year 2000 level of 11,300 jobs in the farm production and services sectors, approximately 1,400 jobs would be lost under the worst-case scenario analyzed (i.e., conservation of 300 KAFY of water via fallowing). With implementation of fallowing to produce water for compliance with the IOP and the Salton Sea Habitat Conservation Strategy, approximately 290 and 920 additional agricultural sector jobs would be lost, respectively. With implementation of the HCP (IID Water Service Area Portion), approximately 20 jobs would be lost. The total job loss under the worst case scenario analyzed in Section 3.14, Socioeconomics, would be 2,630 jobs, which is approximately 22 percent of the total number of farm production and services sector jobs in Imperial County. This potential loss of jobs is well within the variation in farm employment that has occurred over the last 10 years. However, in recognition of the racial and income status of the population that would likely be affected by this loss of employment, this impact was considered to be potentially high and adverse, and as such was reviewed further in this environmental justice analysis.

Most of the jobs that would be lost as a result of the Proposed Project are low-wage agricultural jobs. As stated in Section 3.15.3.1, due to lack of data, it is not possible to determine the exact racial and income characteristics of this affected population. It is, however, reasonable to assume that this affected population would have high percentages of minority (i.e., Hispanic) and low-income individuals. Since this potentially high and adverse loss of employment impact resulting from the Proposed Project is expected to be limited to the IID water service area, and since no other similar employment impacts are expected in other parts of the Project's region of influence, the affected population can be described as receiving an adverse impact that appreciably exceeds the magnitude of similar impacts occurring in other parts of the Project's region of influence. This employment impact can therefore be described as having a disproportionately high and adverse effect on minority and low-income populations.

The IID Board will consider whether measures to mitigate socioeconomic and associated environmental justice impacts as a result of fallowing in the Imperial Valley are appropriate, when it considers whether to approve the Proposed Project or an Alternative to the Proposed Project.

SALTON SEA

Impact EJ-2: Environmental Justice Effects from Windblown Dust as a Result of Sea Level Decline of about 5 to 15 feet. As described in Section 3.7, Air quality, windblown dust from the exposed shoreline of the Salton Sea under the Proposed Project could result in high and adverse air quality impacts. Assuming only on-farm and/or water-delivery system conservation measures are used to conserve water for transfer, under the Proposed Project the Sea's elevation is projected to decline to about -250 feet msl—a decline of about 15 feet compared to the Baseline. Assuming only fallowing is used to conserve water for transfer, the Sea's elevation is projected to decline to about -241 feet msl—a decline of about 6 feet compared to the Baseline.

Implementation of the Salton Sea Habitat Conservation Strategy will offset reductions in the Salton Sea elevation caused by other components of the Proposed Project and thus avoid the air quality impacts of exposed shoreline caused by the Project until approximately 2035. This approach would provide mitigation water, generated by fallowing or other methods in the IID water service area or from other sources of water, to allow water to continue to flow to the Sea at a rate equal to the Baseline, thereby avoiding impacts to the Sea associated with reduced drain flow. The elevation of the Salton Sea is projected to decline to about -240 feet msl by the year 2077 with implementation of the Salton Sea Habitat Conservation Strategy. As described in Section 2.2.6.7, the Salton Sea Habitat Conservation Strategy has been evaluated in this final EIR/EIS with the assumption that mitigation water would be generated by fallowing within the IID water service area. Other sources of water could be used, but they have not been evaluated in this EIR/EIS.

Additionally, under the Proposed Project, the implementation of the Salton Sea Habitat Conservation Strategy in concert with the on-farm irrigation system improvement approach to conserving water for transfer was determined not to be feasible because of the number of total acres that would be needed. This is because the “efficiency conservation” measures require a 1 to 1 ratio of mitigation water to the Sea. Therefore, the combination of only on-farm and/or delivery system efficiency conservation measures required to produce 300 KAFY for transfer plus fallowing within the IID water service area as the sole method of providing the mitigation water associated with the Salton Sea Habitat Conservation Strategy has not been assessed in this final EIR/EIS.

The air quality monitoring and mitigation plan proposed for the impact that will occur after 2035 includes a four-step plan that would be implemented to mitigate significant PM₁₀ emissions and incremental health effects (if any) from Salton Sea sediments exposed by the Proposed Project. This four-step plan is described in Section 3.7, Air Quality.

The proposed mitigation is potentially sufficient to avoid or suppress PM₁₀ emissions to less than significant levels. However, a level of uncertainty remains regarding whether short-term and long-term impacts can be mitigated to a less-than-significant level. Therefore, to be conservative, the EIR/EIS concludes that the impacts are potentially significant and unmitigable.

Due to the complex nature of air dispersion patterns, the geographic extent of this potentially high and adverse impact could not be definitively identified. Consequently, as described in Section 3.15.3.2, Environmental Setting, two geographic areas were analyzed for the affected population analysis. Under Scenario 1 (a local scenario), the air quality impact was assumed to be greatest near the shoreline of the Salton Sea. GIS analysis was used to identify the racial and income characteristics of the population residing within a 1-mile buffer around the Salton Sea shoreline. Under Scenario 2 (a regional scenario), the air quality impact was assumed to be potentially high and adverse throughout the SSAB (see Section 3.7, Air Quality, for the geographic extent of the SSAB). GIS analysis was used to identify the racial and income characteristics of the entire population residing within the SSAB.

Under Scenario 1, the population affected by this potentially high and adverse impact is approximately 41 percent racial minority, 57 percent Hispanic, and 29 percent low-income. Under Scenario 2, the population affected by this potentially high and adverse impact is

approximately 38 percent racial minority, 54 percent Hispanic, and 18 percent low-income. Under both scenarios, the racial minority and low-income population percentages are below the thresholds established for this analysis, i.e., 50 percent and 37 percent, respectively. Conversely, under both scenarios, the Hispanic population percentages are above the Hispanic population threshold of 50 percent. Consequently, the affected population under both scenarios can be described as a Hispanic population, which under the CEQ 1997 definition is also a minority population. As the potentially high and adverse air quality impact resulting from the Proposed Project is expected to be limited to the SSAB, and as no other similar air quality impacts are expected in other parts of the Project's region of influence, the affected population can be described as receiving an adverse impact that appreciably exceeds the magnitude of similar impacts occurring in other parts of the Project's region of influence. This potential air quality impact can therefore be described as having a disproportionately high and adverse effect on a minority population (i.e., a Hispanic population).

Mitigation Measures. Other than the proposed mitigation for the air quality impact described above, no additional mitigation is proposed.

CVWD SERVICE AREA

Impact EJ-3: Environmental Justice Effects from Windblown Dust as a Result of Sea Level Decline. High and adverse impacts to air quality could occur in the CVWD service area from exposure of the Salton Sea bed. For a discussion of the disproportionately high and adverse air quality impact on a minority population in the SSAB, which includes the CVWD service area, refer to the discussion above under "Salton Sea."

In addition to the air quality impact mentioned above, CVWD's receipt and use of conserved water under the Proposed Project (QSA Implementation scenario) would result in exceedances of secondary (i.e. aesthetic) drinking water standards for TDS in certain areas within the CVWD service area. As described in Section 3.15.3.3, the affected population was determined to be approximately 34 percent racial minority, 45 percent Hispanic, and 15 percent low-income. None of these percentages cross the thresholds established for this environmental justice analysis for identification of a minority or low-income population (see Section 3.15.4.1, Methodology, for further detail on how the thresholds were determined). Consequently, this affected population cannot be described as minority or low-income. This drinking water impact, therefore, cannot be described as having a disproportionately high and adverse effect on a minority or low-income population.

3.15.4.3 Alternative 1: No Project

IID WATER SERVICE AREA AND AAC

Under the No Project Alternative, fallowing would continue to occur at Baseline levels within the IID water service area (i.e., approximately 20,000 acres per year); therefore, the environmental justice effects from employment losses associated with fallowing would be significantly less than under the Proposed Project and Alternatives.

SALTON SEA

Under the No Project Alternative, water levels in the Salton Sea would decline. Water levels are projected to decline from an existing level of -228 to -235 msl (a decline of about 7 feet) over the next 75 years. The exposure of this previously inundated area may result in

windblown dust as described in Impact EJ-2. However, less acreage would be exposed under the Baseline as compared to the Proposed Project.

CVWD SERVICE AREA

As described above under “Salton Sea,” with implementation of the No Project Alternative, water levels are projected to decline from an existing level of -228 to -235 msl (a decline of about 7 feet) and total surface area is projected to decline from 233,000 to 217,000 acres, exposing about 16,000 acres over the next 75 years. The exposure of this previously inundated area may result in windblown dust as described in Impact EJ-2. However, less acreage would be exposed under the Baseline as compared to the Proposed Project.

3.15.4.4 Alternative 2 (A2): Water Conservation and Transfer of Up To 130 KAFY to SDCWA (On-farm Irrigation System Improvements as Exclusive Conservation Method)

IID WATER SERVICE AREA AND AAC

Impact A2-EJ-1: Environmental Justice Effects from Net Loss of up to 1,530 Jobs from Fallowing under IOP and the HCP. Under Alternative 2, fallowing would not occur in the IID water service area with implementation of the water conservation program; therefore, the employment losses associated with fallowing under the water conservation program would not occur in the IID water service area. However, fallowing would occur with implementation of fallowing to produce water for compliance with the IOP and the Salton Sea Habitat Conservation Strategy, resulting in a loss of 290 and 1,220 jobs in the agricultural sector, respectively. With implementation of the HCP (IID Water Service Area Portion), approximately 20 jobs would be lost. Based on a similar rationale as described under EJ-1, this employment impact would have a disproportionately high and adverse effect on minority and low-income populations.

As stated under EJ-1, IID Board will consider whether measures to mitigate socioeconomic and associated environmental justice impacts as a result of fallowing in the Imperial Valley are appropriate, when it considers whether to approve the Proposed Project or an Alternative to the Proposed Project.

SALTON SEA

Impact A2-EJ-2: Environmental Justice Effects from Windblown Dust as a Result of Sea Level Decline of about 7 feet. The environmental justice impacts under Alternative 2 would be similar to those described for this subregion under the Proposed Project. Under Alternative 2, the Sea’s elevation is projected to decline to -242 feet msl; a decline of about 7 feet compared to the Baseline. With implementation of the Salton Sea Habitat Conservation Strategy, elevation of the Sea would not decline below the Baseline elevation until the year 2035 and would reach its lowest elevation (-242 feet msl) at the end of the Project term.

As described in Section 2.2.6.7, the Salton Sea Habitat Conservation Strategy has been evaluated in this final EIR/EIS with the assumption that mitigation water would be generated by fallowing within the IID water service area. Other sources of water could be used but they have not been evaluated in this EIR/EIS.

CVWD SERVICE AREA

Impact A2-EJ-3: Environmental Justice Effects from Windblown Dust as a Result of Sea Level Decline. The environmental justice impacts under Alternative 2 would be similar to those described for this subregion under the Proposed Project. (See Impact A2-EJ-2.)

3.15.4.5 Alternative 3 (A3): Water Conservation and Transfer of Up To 230 KAFY to SDCWA, CVWD, and/or MWD (All Conservation Measures)

IID WATER SERVICE AREA AND AAC

Impact A3-EJ-1: Environmental Justice Effects from Net Loss of up to 3,420 Jobs from Following under Conservation Program, IOP, and the HCP. Under Alternative 3, the employment impacts would be similar to those described under the Proposed Project, resulting in a disproportionately high and adverse effect on minority and low-income populations for the same reasons described under EJ-1.

As stated under EJ-1, IID Board will consider whether measures to mitigate socioeconomic and associated environmental justice impacts as a result of following in the Imperial Valley are appropriate, when it considers whether to approve the Proposed Project or an Alternative to the Proposed Project.

SALTON SEA

Impact A3-EJ-2: Environmental Justice Effects from Windblown Dust as a Result of Sea Level Decline of about 4 to 12 feet. The environmental justice impacts under Alternative 3 would be similar to those described for this subregion under the Proposed Project. Under Alternative 3, if on-farm and/or system-based conservation methods are implemented to conserve water for transfer, the Sea's elevation is projected to decline to about -247 feet msl; a decline of about 12 feet compared to the Baseline. If fallowing is used to conserve water for transfer, the elevation is predicted to decline to about -239 feet msl; a decline of about 4 feet compared to the Baseline. With implementation of the Salton Sea Habitat Conservation Strategy, the elevation of the Sea would not decline below the Baseline elevation until the year 2035 and would reach its lowest elevation (-246 feet msl or -239 feet msl for the conservation methods described above, respectively) at the end of the Project term.

CVWD SERVICE AREA

Impact A3-EJ-3: Environmental Justice Effects from Windblown Dust as a Result of Sea Level Decline. The environmental justice impacts under Alternative 3 would be similar to those described for this subregion under the Proposed Project. However, the Sea level decline, and resultant environmental justice effects, would be less. (See Impact A3-EJ-2.)

3.15.4.6 Alternative 4 (A4): Water Conservation and Transfer of Up To 300 KAFY to SDCWA, CVWD, and/or MWD (Fallowing As Exclusive Conservation Method)

IID WATER SERVICE AREA AND AAC

Impact EJ-1: Environmental Justice Effects from Net Loss of up to 2,630 Jobs from Following under Conservation Program, IOP, and the Salton Sea Habitat Conservation Strategy. Under Alternative 4, the employment impacts would be the same as those described under the Proposed Project's worst-case scenario (i.e., conservation of 300 KAFY of water via fallowing), resulting in a disproportionately high and adverse effect on minority and low-income populations.

As stated under EJ-1, the IID Board will consider whether measures to mitigate socioeconomic and associated environmental justice impacts as a result of fallowing in the Imperial Valley are appropriate, when it considers whether to approve the Proposed Project or an Alternative to the Proposed Project.

SALTON SEA

Impact A4-EJ-2: Environmental Justice Effects from Windblown Dust as a Result of Sea Level Decline of up to 6 feet. The environmental justice effects under Alternative 4 would be similar to those described for this subregion under the Proposed Project, with fallowing as the sole method of conservation for transfer and the Salton Sea Habitat Conservation Strategy.

As described in Section 2.2.6.7, the Salton Sea Habitat Conservation Strategy has been evaluated in this final EIR/EIS with the assumption that mitigation water would be generated by fallowing within the IID water service area. Other sources of water could be used, but they have not been evaluated in this EIR/EIS.

CVWD SERVICE AREA

Impact A4-EJ-3: Environmental Justice Effects from Windblown Dust as a Result of Sea Level Decline. The environmental justice effects under Alternative 4 would be similar to those described for this subregion under the Proposed Project.