SECTION 8 CLOSURE PLAN AND POST-OPERATIONAL REPORTING

8.1 CLOSURE PLAN

A Closure Plan will be developed as part of the Management Plan to ensure that no residual effects of project operations will result in adverse impacts to critical resources (as defined in Section 7) in or adjacent to the project area during or after the post-operational phase.

A Closure Plan would be prepared when static groundwater levels have declined by 10 feet from preoperational levels. A Closure Plan will be prepared by Metropolitan no later than at year 25 of project operations. Metropolitan will work closely with the BLM Authorized Officer, who will provide input and guidance throughout the development and refinement of the Closure Plan. The BLM Authorized Officer will, as determined appropriate, receive comments and recommendations from the TRP regarding the development and refinement of the Closure Plan. The Closure Plan will monitor groundwater levels and groundwater quality for a minimum period of 10 years to protect critical resources and groundwater quality for beneficial uses as required by federal and State law, including the requirements of the California Water Quality Control Board, Colorado River Basin Region. The provisions and mitigation obligations under this Management Plan will be in effect and run concurrently with the term of the Closure Plan. Once prepared, the Closure Plan will be reevaluated every five years in consultation with the TRP. Such reevaluation may include refinements to the Closure Plan.

Under this Management Plan, Metropolitan will review and analyze groundwater levels, water quality information, and all other monitoring data; as well as prepare the annual and five-year reports. One purpose of the five-year reports is to identify any actions that would be taken with the objective to ensure that any decline in pre-operational static groundwater levels would not exceed 100⁶ feet at the end of project operations (Closure Groundwater Levels) or lead to projections of adverse impacts to critical resources during or after the post-operational phase.

As noted in Section 1.1 of the Final EIR/EIS main volume, all pumping of groundwater in the project area by the Cadiz Agricultural Development will be subject to the provisions of this Management Plan. With the combination of the Cadiz Agricultural Development and the project, there may be declines in static groundwater levels at the termination of project operations. Implementation of the Closure Plan is intended to ensure that the Closure Groundwater Levels are not exceeded and that the groundwater quality will be protected for beneficial uses as described in the policies of the Regional Water Quality Control Board, Colorado River Basin Region, including any applicable new or revised standards that may be adopted by the Regional Water Quality Control Board⁷.

8.2 **POST-OPERATIONAL REPORTING**

During the post-operational phase, Metropolitan would collect, analyze and summarize water level and quality data in a report to confirm compliance with the Closure Plan. These post-operational reports will be distributed to the Regional Water Quality Control Board and the BLM Authorized Officer, and will be available to interested parties upon request.

⁶ Closure Plan groundwater levels and static groundwater levels for the five-year reports will be calculated by averaging static groundwater levels in all project area production wells.

⁷ Closure Plan water quality for the five-year reports will be calculated by averaging water quality data in all project area production wells.