Addendum No. 1 to Mitigated Negative Declaration for the Fiscal Year 2020-2021 Non-Potable Water Connections Project

State Clearinghouse No. 2020100292

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Acronyms and Abbreviations

AB	Assembly Bill
AFY	acre foot per year
APE	Area of Potential Effect
AQMP	Air Quality Management Plan
BGEPA	Bald and Golden Eagle Protection Act
BMP	best management practice
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
CGS	California Geologic Society
CHRIS	California Historical Resources Information System
CMP	Congestion Management Program
CNDDB	California Natural Diversity Database
CRHR	California Register of Historical Resources
CVMSHCP	Coachella Valley Multiple Species Habitat Conservation Plan
CVWD	Coachella Valley Water District
CWSRF	Clean Water State Revolving Fund
DAC	Disadvantaged Community
dBA	A-weighted decibels
DWR	California Department of Water Resources
EIC	Eastern Information Center
EO	Executive Order
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FY	Fiscal Year
L_{eq}	sound equivalent level
LSTs	Localized Significance Thresholds
MBTA	Migratory Bird Treaty Act
MHI	median household income
MND	Mitigated Negative Declaration
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
ND	Negative Declaration
NEPA	National Environmental Policy Act
NHMLAC	Natural History Museum of Los Angeles County
NHPA	National Historic Preservation Action
NMFS	National Marine Fisheries Service
NPDES	National Pollutant Discharge Elimination System
NPW	Non-Potable Water
NPS	National Park Service
NRHP	National Register of Historic Places

EIR	Environmental Impact Report
RCTC	Riverside County Transportation Commission
RWQCB	Regional Water Quality Control Board
RV	Recreational Vehicle
SCAQMD	South Coast Air Quality Management District
SCH	State Clearinghouse
SCIC	South Coast Information Center
SDAC	Severely Disadvantaged Community
SGMA	Sustainable Groundwater Management Act
SMP	Sanitation Master Plan
SRA	source receptor area
SRF	State Revolving Fund
SSAB	Salton Sea Air Basin
SVP	Society of Vertebrate Paleontology
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UWMP	Urban Water Management Plan
WEAP	Worker Environmental Awareness Program
WMP	Water Management Plan
WRP	Water Reclamation Plant
WSCP	Water Shortage Contingency Plan

1. INTRODUCTION

This document is the first Addendum to the Fiscal Year (FY) 2020-2021 Non-Potable Water (NPW) Connections Project Mitigated Negative Declaration (MND) (State Clearinghouse [SCH] No. 2020100292). The Addendum to the MND has been prepared pursuant to the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq. Consistent with CEQA Guidelines Section 15152, this Addendum also tiers from CEQA-compliant documentation for recent and related projects in the surrounding vicinity including Water Reclamation Plant (WRP) #7 Phase 1 NPW Improvements Project (SCH No. 2023080439) and FY 2017-2018 NPW Connections Project (SCH No. 2018051031) as well as the 2020 Sanitation Master Plan (SMP) Update and associated Final Program Environmental Impact Report (EIR) (SCH No. 2019090307). As described in CEQA Guidelines Section 15152(a): *"'[t]iering' refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project."*

1.1. Project Background

1.1.1. Coachella Valley Water Management Plan

In September 2002, CVWD adopted the Coachella Valley Water Management Plan (WMP), which was compiled to reliably *"…meet current and future water demands in a cost-effective and sustainable manner."* In January 2012, an update to the WMP was completed which addressed changing conditions such as increased water demands and evolving federal and state laws and regulations. In 2014, the California Legislature enacted the Sustainable Groundwater Management Act (SGMA) to provide a framework for sustainable groundwater management. To implement SGMA in the Indio Subbasin, four local water agencies formed Groundwater Sustainability Agencies (GSAs): CVWD, Coachella Water Authority (CWA), Desert Water Agency (DWA), and Indio Water Authority (IWA). In 2016, the Indio Subbasin GSAs entered into a Memorandum of Understanding for collaborative management of the Indio Subbasin under SGMA. CVWD's WMP was submitted as an alternative groundwater sustainability plan (GSP) and was approved in 2019 by the California Department of Water Resources. Under SGMA, a 5-year review and update is required, most recently completed in 2022 (Indio Subbasin GSAs 2021). The 2002 WMP, 2010 WMP Update, and 2022 WMP Update, collectively referenced as WMP in this document, include the following five major elements:

- Water conservation (urban, golf course, and agricultural);
- Increasing surface water supplies for the Coachella Valley from outside sources;
- Substitution of surface water supplies for groundwater (source substitution);
- Groundwater recharge; and

- Monitoring and evaluation of subsidence and groundwater levels and quality to provide the information needed to manage the Coachella Valley's groundwater resources.

The Approved Project and the Modified Project described herein are part of the source substitution element of the WMP. As stated in the WMP:

> *"Source substitution is the delivery of an alternate source of water to users that currently pump groundwater. The substitution of an alternate water source reduces groundwater extraction and allows the groundwater to remain in storage, thus reducing overdraft."*

The source substitution element is described in additional detail in Section 6.5 of the 2010 WMP Update (CVWD 2012). The Approved Project and the Modified Project are part of this near-term effort to reduce groundwater overdraft in accordance with the water management goals and objectives of the WMP. Accordingly, the WMP is addressed throughout the impact analysis as applicable to the respective environmental issue areas.

1.1.2. 2020 Coachella Valley Regional Urban Water Management Plan

The six urban water suppliers in the Coachella Valley, (CVWD, Coachella Water Authority, Desert Water Agency, Indio Water Authority, Mission Springs Water District, and Myoma Dunes Mutual Water Company) collaboratively prepared the 2020 Coachella Valley Regional Urban Water Management Plan (UWMP), including regional and individual agency content and other necessary elements as set forth in DWR's 2020 UWMP Guidebook. Each agency also prepared a Water Shortage Contingency Plan (WSCP) to describe the actions that could be taken during a water shortage to reduce demands. The 2020 Coachella Valley Regional UWMP and CVWD's WSCP were adopted by the Board of Directors on June 22, 2021 and submitted to DWR on July 1, 2021.

1.1.3. Existing Non-Potable Water Facilities

Recycled water, also referred to as reclaimed water, is defined in the Title 22 California Code of Regulations (Title 22, Chapter 3) and refers to water produced by the three-stage (tertiary) treatment of municipal wastewater. CVWD owns and operates five WRPs, two of which (WRP #7 and WRP #10) generate recycled water for irrigation of golf courses and large landscaped areas (CVWD 2020). WRP #1, WRP #2, and WRP #4 currently do not provide NPW connections.

At WRP #7, tertiary treated recycled water is blended with Colorado River water from the Coachella Canal and is served to two 18-hole golf courses at one site and an additional nine holes at another site. At WRP #10, tertiary treated water is blended with Colorado River water from the Mid-Valley Pipeline (MVP) before being distributed to golf courses and other large landscape customers. The WRPs deliver the remaining secondary effluent into percolation ponds. CVWD provides the blend of recycled water and Colorado River water, individually and collectively referred to as Blended Recycled Water or NPW, to water impoundments and the conveyance system for irrigation purposes across the service area (CVWD 2020).

On August 20, 2018, the CVWD Board of Directors adopted the FY 2017-2018 NPW Connections Project MND, which evaluated the potential environmental impacts associated with the

construction and operation of approximately 9.5 miles of NPW pipeline segments and connections to provide irrigation water to seven local golf courses, one recreational vehicle (RV) resort, one planned future development and replacement of an existing pump station. On June 4, 2021, the CVWD Board of Directors approved the FY 2020-2021 NPW Connections Project MND, which evaluated the potential environmental impacts associated with the construction and operation of approximately 12 miles of additional NPW pipeline.

CVWD has also prepared CEQA-documentation for similar projects including the WRP #7 Phase 1 NPW Improvements Project, which involved improvements to the existing tertiary treatment plant processes and an existing canal pump station at WRP #7. This project also involved the installation of 2,500 linear feet of NPW pipeline.

1.1.4. Proposed Modified Project

The proposed FY 2024-2025 NPW Pipeline Connection Project (Modified Project) would expand CVWD's WRP #7 and WRP #10 NPW services and deliver an average of approximately 2,993 acre feet per year (AFY) of NPW to five new NPW customers and would expand the low pressure pipeline capacity within the WRP #10 service area (see Table 1). The proposed Project would involve the installation of approximately 34,200 linear feet of pipeline ranging from 12-inch to 36-inch diameter. All excavations would be approximately 5 feet deep with an average width of approximately 3 feet. Most of the activities would be located within City of Palm Desert and City of Indio rights-of-way with approximately 4,200 linear feet of pipeline within customer-owned properties. Construction activities associated with the Modified Project would involve the installation of pipelines, concrete-work, and installation of metering and control vaults, flow meters, control valves, and telemetry systems.

1.2. Purpose of Addendum

This Addendum to the FY 2020-2021 NPW Connections Project MND addresses potential environmental effects of the construction and operation of the Modified Project discussed in greater detail in Section 2, *Project Description*. The MND and this Addendum, together with the other documents incorporated by reference herein, serve as the environmental review of the Modified Project, as required pursuant to the provisions of CEQA, the CEQA Guidelines, 14 California Code of Regulations Section 15000 et seq. The environmental analysis in this Addendum and all feasible mitigation measures identified in the MND would be incorporated into the resolutions approving the Modified Project.

1.3. Basis for Addendum

CEQA Guidelines Section 15164 states that *"[t]he lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR have occurred."* Pursuant to CEQA Guidelines Section 15162, no Subsequent EIR may be required for the project unless the lead agency determines, on the basis of substantial evidence, that one or more of the following conditions are met:

A. When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

(1) Substantial changes are proposed in the project which would require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which would require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

(a) The project would have one or more significant effects not discussed in the previous EIR or negative declaration;

(b) Significant effects previously examined would be substantially more severe than shown in the previous EIR;

(c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

B. If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a Subsequent EIR if required under subdivision (a). Otherwise the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.

C. Once a project has been approved, the lead agency's role in project approval is completed, unless further discretionary approval on that project is required. Information appearing after an approval does not require reopening of that approval. If after the project is approved, any of the conditions described in subdivision (a)

> occurs, a Subsequent EIR or negative declaration shall only be prepared by the public agency which grants the next discretionary approval for the project, if any. In this situation no other responsible agency shall grant an approval for the project until the Subsequent EIR has been certified or subsequent negative declaration adopted.

CVWD has assessed the Modified Project in light of the requirements defined under CEQA Guidelines Section 15162. As discussed in this Addendum, none of the conditions requiring preparation of a Subsequent Negative Declaration (ND) under CEQA Guidelines Section 15162 are identified.

1.4. Evaluation of Environmental Impacts

This Addendum uses Environmental Checklist questions, pursuant to CEQA Guidelines Section 15063(d)(3), to compare the anticipated environmental effects of the proposed Modified Project with those disclosed in the MND for the Approved Project. The Addendum reviews whether any of the conditions requiring preparation of a Subsequent MND pursuant to CEQA Guidelines Section 15162 are met, and whether there are new significant impacts resulting from the proposed Modified Project. The Environmental Checklist questions are used to review the potential environmental effects of the proposed Modified Project for each of the following resource areas:

- Aesthetics;
- Agriculture Resources;
- Air Quality;
- Biological Resources;
- Cultural Resources;
- Geology and Soils;
- Greenhouse Gas Emissions;
- Energy;
- Hazards and Hazardous Materials;
- Hydrology and Water Quality;
- Land Use and Planning;
- Mineral Resources;
- Noise;
- Population and Housing;
- Public Services;
- Recreation;
- Transportation and Traffic;
- Tribal Cultural Resources;
- Utilities and Service Systems; and
- Wildfire.

As previously described, the Modified Project would involve an extension of the previously approved NPW pipelines to expand CVWD's WRP #7 and WRP #10 NPW services. The methods of construction (i.e., pavement cutting, grading, trenching, and restoration) are the same as, or very similar to, those evaluated in the MND. Based on the similarities in construction methods and location of the Approved Project and the Modified Project, the environmental analysis provided in the MND remains current and applicable to the Modified Project. Additional air quality modeling (see Appendix A), biological resources surveys (see Appendix B), and cultural resources surveys (see Appendix C) were conducted to evaluate potential impacts to these resource areas and to support additional requirements and coordination necessary to supporting funding from the Clean Water State Revolving Fund (SRF). The SRF – partially funded by the U.S. Environmental Protection Agency (USEPA) – provides low-interest financing and is administered by the State Water Resources Control Board (SWRCB). Congress first appropriates

funding for the SRF; USEPA then awards capitalization grants to States for their SRF. Due to the federal nexus with USEPA, federal laws and regulations (referred to herein as "federal cross-cutters") apply to all projects pursuing SRF financing. Under the SRF program, the SWRCB uses the CEQA document plus federal cross-cutting documentation in place of a National Environmental Policy Act (NEPA) document in what is termed "CEQA-Plus" documentation (see Section 5, *Federal Cross-Cutting Environmental Regulations*). The SWRCB does not complete a NEPA review process, but rather completes the "NEPA-like" process of CEQA-Plus.

The conclusions and mitigation measures in the MND are applicable to the Modified Project. The following resource areas were found to have No Impact or Less than Significant Impact in the MND, and the Modified Project would also result in a finding of No Impact or Less than Significant Impact. No additional analyses are required for the following unchanged environmental resources evaluated in the MND. For a discussion and analysis of the resources topics below, please refer to the previous MND for the FY 2020-2021 NPW Connections Project (SCH No. 2020100292), as these resource areas are not analyzed further in this Addendum:

3.1 Aesthetics

a) Substantial adverse effect on a scenic vista

b) Substantial damage to scenic resources, including but not limited to trees, rock outcroppings, and historic buildings along a state scenic highway?

c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

d) Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

3.2 Agricultural and Forest Resources

a) Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance (Farmland), as shown on 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) Conflict with existing zoning for or cause rezoning of forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

d) Result in the loss of forest land or conversion of forest land to non-forest use?

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?

3.3 Air Quality

a) Conflict with or obstruct implementation of the applicable air quality plan?

b) 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?

c) Expose sensitive receptors to substantial pollutant concentrations?

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

3.4 Biological Resources

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

3.5 Cultural Resources

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

c) Disturb any human remains, including those interred outside of formal cemeteries?

3.6 Energy

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

3.7 Geology and Soils

a) Directly or indirectly cause 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?

ii. Strong seismic groundshaking?

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 made unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?

d) Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code, creating substantial direct or indirect risks to life or property?

3.8 Greenhouse Gas Emissions

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b) Conflict with any applicable plan, policy, or regulation adopted to reduce the emissions of greenhouse gases?

3.9 Hazards and Hazardous Materials

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 0.25 mile of an existing or proposed school?

d) Be located on a site which is included on a list of hazardous material 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?

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 or excessive noise for people residing or working in the project area?

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

3.10 Hydrology and Water Quality

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

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

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:

   i. Result in substantial erosion or siltation on- or off-site?

   ii. Substantially alter the existing drainage pattern of the site or area, including the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or offsite?

   iii. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

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

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

3.11 Land Use and Planning

a) Physically divide an established community?

b) Cause a significant environmental impact with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

3.12 Mineral Resources

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?

3.13 Noise

a) Result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

b) Result in generation of excessive groundborne vibration or groundborne noise levels?

c) For a project located within the vicinity of a private airstrip or 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, expose people residing or working in the project area to excessive noise levels?

3.14 Population and Housing

a) Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?

b) Displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere?

3.15 Public Services

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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?

3.16 Recreation

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?

3.17 Transportation

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 use (e.g., farm equipment)?

f) Conflict with adopted policies, plans, or programs regarding public transit, bikeways, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities?

3.19 Utilities and Service Systems

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry year?

c) 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?

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

3.20 Wildfire

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

This Addendum evaluates environmental resources for which the Modified Project that were previously identified as potentially significant for the Approved Project and required mitigation as disclosed in the MND. Because of the Modified Project's similarity to the Approved Project in

location and construction methods, there the Modified Project would generally have similar impacts as the Approved Project.

In addition, this document includes comprehensive analysis of the Modified Project to support compliance with federal environmental review requirements necessary for CVWD to pursue federal funding programs. The federal cross-cutting topics evaluated include:

- Federal Endangered Species Act (ESA)
- National Historic Preservation Act (NHPA)
- Archaeological and Historic Preservation Act
- Clean Air Act
- Coastal Zone Management Act
- Farmland Protection Policy Act
- Executive Order (EO) 11988 – Floodplain Management, as amended by EOs 12148 and 13690
- Federal Migratory Bird Treaty Act (MBTA), Bald and Golden Eagle Protection Act (BGEPA), and EO 13168
- Fish and Wildlife Coordination Act
- EO 11990 – Protection of Wetlands
- EO 13112 – Invasive Species
- Wild and Scenic Rivers Act
- Safe Drinking Water Act, Sole Source Aquifer Program
- EO 13195 – Trails for America in the 21st Century
- EO 13007 – Indian Sacred Sites
- Magnuson-Stevens Fishery Conservation and Management Act
- Rivers and Harbors Act, Section 10
- Wilderness Act
- Environmental Justice
- Alternatives

Impact Terminology

The responses to each of the Environmental Checklist questions addressed in this Addendum use CEQA terminology as specified below:

- **Reduced Impact.** The impacts of the Modified Project would be less than those of the Approved Project.
- **No New Impact/No Impact.** The Modified Project would result in no or no new impact compared to the Approved Project.
- **New Mitigation Required.** The Modified Project would result in a new or substantially greater impact compared to the Approved Project and new mitigation would be required to reduce the impact to a less than significant level.
- **New Potentially Significant Impact.** The Modified Project would result in a new impact or substantially greater impact compared to the Approved Project. A subsequent MND would be required.

1.5. Summary of Findings

The environmental evaluation in Addendum has concluded that major revisions of the MND due to new significant environmental effects or a substantial increase in the severity of previously identified significant effects are not required. While the Modified Project would further expand the NPW pipeline network there would be no substantial changes proposed in the Modified Project in terms of general construction activities and future operational activities. Additionally, while there would be 34,200 linear feet of new disturbance area associated with the NPW pipeline, this area would be located in disturbed rights-of-way as described for the Approved Project; therefore, there would be no substantial changes in the circumstances under which the Modified Project would be undertaken. Lastly, there is no new information of substantial importance, which was unknown, or could not have been know at the time the MND was certified. As described further in Section 3, *Evaluation of Environmental Impacts*, the impacts of the Modified Project are consistent with the impacts of the Approved Project. There are no new significant impacts resulting from implementation of the Modified Project, nor are there any substantial increases in the severity of any previously identified environmental impacts, and no new mitigation measures would be required. The environmental analysis in this Addendum and all applicable mitigation measures identified in the MND would be incorporated into the resolutions approving the Modified Project.

2. PROJECT DESCRIPTION

2.1. Purpose of Project

As previously described in Section 1.1.1, *Coachella Valley Water Management Plan*, CVWD's 2002 WMP, 2010 WMP Update, and 2022 Update set forth several groundwater source substitution projects, including the provision of NPW pipeline for irrigation of golf courses that currently pump groundwater for irrigation use. On July 17, 2019, CVWD obtained approval of the 2010 WMP from the California Department of Water Resources (DWR) as an "Alternative Plan" in compliance with the requirements of the Sustainable Groundwater Management Act (SGMA). The key water management plan elements of the "Alternative Plan" include water conservation, water supply augmentation, groundwater recharge, and source substitution. CVWD reviewed and updated the WMP as a SGMA requirement in 2022. The Modified Project is part of the source substitution element and would contribute to existing CVWD efforts to reduce groundwater overdraft in accordance with the water management goals and objectives.

2.2. Environmental Setting

The Modified Project is located in the eastern portion of the greater Coachella Valley. Physically, the eastern Coachella Valley is bounded by the Santa Rosa Mountains to the west, and the Mecca Hills and the edge of Joshua Tree National Park to the northeast. The Modified Project is located in the Coachella Valley region of the Salton Sea Air Basin and the Whitewater River Watershed. As previously described, most of the activities would be located within City of Palm Desert and City of Indio rights-of-way with approximately 4,200 linear feet of pipeline within customer-owned properties (see Figure 1).

The Coachella Valley Multiple Species Habitat Conservation Plan and Natural Community Conservation Plan (CVMSHCP) is a comprehensive multiple species habitat conservation

planning program that addresses multiple species needs, including habitat and the preservation of natural communities in the Coachella Valley area of Riverside County. The CVMSHCP was adopted by the plan participants in 2007 and 2008, and permits were issued by the wildlife agencies in late 2008. The Modified Project is not located within or adjacent to a conservation area associated with the CVMSHCP (see the *Biological Resources* discussion in Section 3, *Evaluation of Environmental Impacts*).

2.3. Modified Project Infrastructure

The proposed FY 2024-2025 NPW Pipeline Connection Project (Modified Project) would expand CVWD's WRP #7 and WRP #10 NPW services and deliver an average of approximately 2,993 acre feet per year (AFY) of NPW to five new NPW customers and would expand the low pressure pipeline capacity within the WRP #10 service area (see Table 1). The proposed Project would involve the installation of approximately 34,200 linear feet of pipeline ranging from 12-inch to 36-inch diameter. All excavations would be approximately 5 feet deep with an average width of approximately 3 feet. Most of the activities would be located within City of Palm Desert and City of Indio rights-of-way with approximately 4,200 linear feet of pipeline within customer-owned properties. Construction activities associated with the Modified Project would involve the installation of pipelines, concrete-work, and installation of metering and control vaults, flow meters, control valves, and telemetry systems.

Table 1. Proposed Project Non-Potable Water End User Connections

Land Use Type	Connection Name	Location
Golf Course	Desert Island CC	71-777 Frank Sinatra Drive Rancho Mirage, CA 92270
Golf Course	The Springs	1 Duke Drive Rancho Mirage, CA 92270
Water Infrastructure	WRP #10 Low Pressure Pipeline Capacity Expansion	Hovley Lane and Portola Avenue Palm Desert, CA 92260
High School	Shadow Hills HS	39-225 Jefferson St Indio, CA 92203
Residential Neighborhood	Talavera	Westwick Street Indio, CA 92203
Golf Course	Shadow Hills Golf Club (North Course)	81-420 N Sun City Boulevard Indio, CA 92203
Golf Course	Shadow Hills Golf Club (East Course)	80875 Avenue 40 Indio, CA 92203
Golf Course	Shadow Hills Golf Club (West Course)	80814 Sun City Blvd Indio, CA 92203

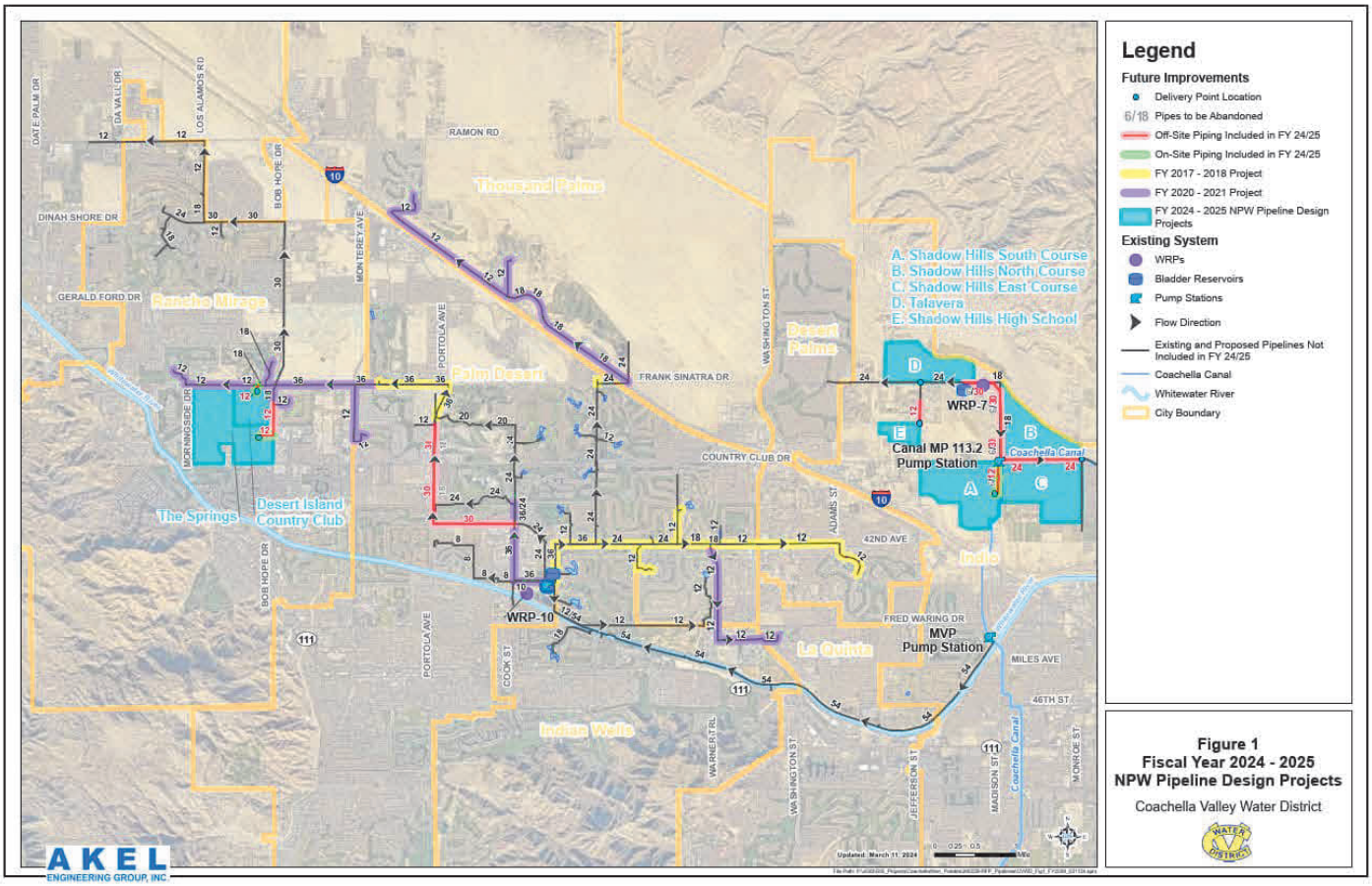
Table 2. New NPW Pipeline Segments per Jurisdiction

City	Length of New Pipeline (LF)
Rancho Mirage	3,608
Palm Desert	11,972
Indio	18,466

Table 3. APNs for Properties Traversed by the Proposed Project

APNs		
624040034	688130002	691180005
624040035	688160045	691180006
688050002	691100029	691180006
688050005	691100030	691180010
688060006	691110011	
688060023	691130007	

Figure 1. FY 2024-2025 NPW Connections Project



2.3.1. Construction Methods

Construction assumptions associated with the Modified Project, which would involve the installation of 34,200 linear feet of NPW pipeline have been developed based on the construction assumptions for the 2020-2021 NPW Connections Project, which involved the construction of 12 miles of NPW pipeline. Construction activities associated with the Modified Project are anticipated to last approximately 1 year. Construction activities required for segment of the proposed NPW pipeline would entail the following:

Figure 2. FY 2024-2025 NPW Connections Project

- **Establishment Staging Area(s)** – A staging area(s) would be required along the construction route to store pipe, construction equipment, and other construction-related material. Potential staging areas may include vacant private and public land, parking lots, and segments of closed traffic lanes.

- **Surface Preparation** – Surface preparation would involve removing structures (e.g., fences or posts), pavement, and/or vegetation from the trenching areas. Equipment may include jack hammers, pavement saws, graders, bulldozers, loaders, and trucks.

- **Trench Excavation/Shoring** – A backhoe, excavator, or trencher would be used to dig trenches for pipe installation. The pipeline trench would be open for a total of 2 to 3 days on average. During construction, vertical wall trenches would be temporarily "closed" at the end of each workday, by covering with steel plates or backfilled.

- **Surface Restoration** – After the NPW pipeline is installed, the ground surface areas would be restored. When NPW pipeline is installed beneath paved roadways, the asphalt would be patched and restored to pre-construction conditions. When the NPW pipeline is installed in dirt roads or shoulders, the dirt would be graded and compacted. In natural or vegetated areas, native plantings would be installed.

The new NPW pipeline segments would be constructed via open trench and/or by a jack and bore technique at major intersections. Figure 2 shows a typical trenching work site for the installation of new segments of NPW pipeline. With the addition of approximately 34,200 linear feet of new pipeline segments under the Modified Project, the total disturbed area would be up to approximately 96,000 square feet, involving up to approximately 480,000 cubic feet (17,780 cubic yards) of earth movement for pipeline installation.

Project construction activities would involve the removal of approximately 6 inches of existing asphalt along the project corridor, yielding approximately 48,000 cubic feet, or approximately 1,780 cubic yards, of total asphalt export. Where the NPW pipeline alignment transects unpaved golf course land, it is assumed that 6 inches of grass and soil would be removed in lieu of asphalt.

Another 6 inches of soil and/or gravel would be removed during trenching to make room for the pipelines. Some native soil would remain on site to be used as backfill. Surplus material resulting from pipeline installation would be exported for disposal at an approved facility. It is assumed that approximately 96,000 cubic feet, or approximately 3,560 cubic yards, of material would be exported in total.

Finally, 6 inches of clean gravel and 6 inches of new asphalt would be imported to backfill and re-pave the construction footprint within public rights-of-way. It is assumed that approximately 48,000 cubic feet, or approximately 1,780 cubic yards, of material would be imported.

Anticipated construction-related vehicle trips include construction workers traveling to and from the work areas, haul trucks (including for import and export of excavated materials, as needed), and other trucks associated with equipment and material deliveries. During peak construction months, construction-related vehicle trips would number approximately 24 one-way trips per day. Any potential local traffic impacts from this increase in vehicle traffic would be temporary, as construction activities would move along the NPW pipeline alignment.

2.3.2. Construction Schedule

It is assumed that approximately 200 linear feet of NPW pipeline would be installed per day. Any potential roadway lane closures would be temporary and phased as construction progresses along the NPW pipeline alignment. Project construction activity is anticipated to occur continuously, between the hours of 7:00 a.m. and 6:00 p.m., Monday through Friday only and excluding federal holidays, which is compliant with the City of Palm Desert and City of Indio municipal codes.

2.3.3. Construction Best Management Practices

CVWD would require implementation of the following construction best management practices (BMPs) with the Modified Project:

- **Drainage / Erosion Control** – During the proposed construction activities, existing storm water facilities including catch basins, manholes, and ditches would be protected using erosion control measures. Design standards outlined in the California Stormwater Quality Association 2023 Construction BMP Handbook would be implemented as applicable to the Modified Project stormwater drainage features. In addition, CVWD and/or its contractor would be required to obtain a Construction General Permit pursuant to the National Pollutant Discharge Elimination System (NPDES) construction storm water regulations, which would require development of a construction Stormwater Pollution Prevention Plan (SWPPP) and implementation of BMPs to prevent polluted runoff from leaving the construction site.

- **Groundwater Dewatering** – The proposed NPW pipeline would be installed at a depth of 5 feet below ground surface. If encountered at this depth, groundwater would be controlled using standard methods including stone sumps wrapped in filter fabric and dewatering basins or baffled tanks if required.

- **Traffic Controls** – Construction of the Modified Project may necessitate temporary lane closures. Traffic control requirements would require that emergency crews have access, as needed, and that the contractor coordinates the location of the work daily for routing of emergency vehicles. Traffic control would also require the contractor to make reasonable efforts, wherever possible, to provide landowners access to their property and patrons access to businesses during execution of the work.

- **Air Quality / Dust Suppression** – CVWD and/or its construction contractor would be required to comply with South Coast Air Quality Management District (SCAQMD) Rule 403.1 to control dust during construction, specific to the Coachella Valley. The contractor is required to have an approved Fugitive Dust Control Plan prior to grading or excavation. CVWD and/or its contractor would be required to comply with the California Air Resources Board (CARB) In-Use Off-Road Diesel-Fueled Fleets Regulations, which would limit vehicle idling time to 5 minutes, restrict adding vehicles to construction fleets that have lower than Tier 3 engines, and establish a schedule for retiring older, less fuel-efficient engines from the construction fleet.

2.3.4. Operation and Maintenance

The delivery of NPW would require pump station operation and motor-actuated valve operation. Operation and maintenance activities associated with the Modified Project would include regular visual inspections of infrastructure and the implementation of repairs on an as-needed basis. These activities are consistent with ongoing operation and maintenance activities for CVWD's existing NPW distribution system.

2.4. Permits and Approvals

CVWD is the lead agency under CEQA with responsibility for approving the Modified Project. Table 4 lists the other approvals that would likely be required for the Modified Project.

Table 4. Summary of Potentially Required Approvals

Regulating Agency	Potential Permit / Approval
SWRCB, in federal/state partnership with the USEPA	Clean Water State Revolving Fund Loan Program
SWRCB, Colorado River Basin Regional Water Quality Control Board (RWQCB)	NPDES Construction General Permit
SWRCB, Colorado River Basin RWQCB	General Order WQ 2016-0068-DDW Water Reclamation Requirements for Recycled Water Use
County of Riverside Department of Transportation	Encroachment Permit
City of Palm Desert	Encroachment Permit
City of Indio Hills	Encroachment Permit
SCAQMD	Fugitive Dust Control Plan, Permit to Construct and Permit to Operate

3. EVALUATION OF ENVIRONMENTAL IMPACTS

The following includes the environmental checklist review pursuant to CEQA. The analysis herein evaluates the adequacy of the environmental impact findings and mitigation in the Approved Project, the FY 2020-2021 NPW Connections Project (Approved Project), relative to impacts and mitigation of the FY 2024-2025 NPW Connections Project (Modified Project). As previously described, the MND for the FY 2020-2021 NPW Connections Project was approved by the CVWD Board of Directors on June 4, 2021.

Biological Resources

As explained in Section 1.4, *Evaluation of Environmental Impacts*, resource areas that were found to have No Impact or Less than Significant Impact in the MND, and for which the Modified Project would also result in a finding of No Impact or Less than Significant Impact, are not analyzed further in this Addendum. This includes checklist questions (b), (c), and (e) under *Biological Resources*. The resource areas under checklist questions (a), (d), and (f) are analyzed below:

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 Wildlife or U.S. Fish and Wildlife Service?*

WSP prepared an update to the Biological Resources Technical Study for the FY 2020-2021 NPW Connections Project, originally prepared by Rincon Consultants, Inc. (2020a) (see Appendix B). The Study Area included the 3-foot-wide NPW pipeline corridor as well as a 25-foot-wide buffer located on either side of the pipeline corridor to account for adjacent work areas as well as potential temporary, indirect construction-related impacts (e.g., dust and noise).

The Study Area is located within the CVMSHCP / Natural Community Conservation Plan (NCCP) area. The CVMSHCP/NCCP is a comprehensive, multi-jurisdictional habitat conservation plan focusing on the conservation of species and their associated habitats in the Coachella Valley region of Riverside County. CVWD is a participating entity in the plan. However, the proposed FY 2024-2025 NPW Pipeline Connections Project alignment is not located within any of the designated CVMSHCP Conservation Areas, which constitute important wildlife habitat and corridors in the region. While the Modified Project would be located within the CVMSHCP boundaries and afforded coverage under the CVMSHCP, it would not affect any Conservation Areas as construction activities would primarily occur within previously developed and routinely managed areas.

Special-status species are those plants and wildlife species that are: 1) listed, proposed for listing, or candidates for listing as Threatened or Endangered by the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) under the federal ESA; 2) listed or proposed for listing as Rare, Threatened, or Endangered by the California Department of Fish and Wildlife (CDFW) under the CESA; 3) recognized as Species of Special Concern by the CDFW; 4) afforded protection under the MBTA, BGEPA, and/or California Fish and Game Code; and 5) occurring on lists 1 and 2 of the CDFW California Rare Plant Rank system per the following definitions:

- List 1A = Plants presumed extinct in California
    - List 1B.1 = Rare or endangered in California and elsewhere; seriously endangered in California (over 80 percent of occurrences threatened/high degree and immediacy of threat)
    - List 1B.2 = Rare or endangered in California and elsewhere; fairly endangered in California (20 to 80 percent occurrences threatened)
    - List 1B.3 = Rare or endangered in California and elsewhere, not very endangered in California (less than 20 percent of occurrences threatened or no current threats known)
- List 2 = Rare, threatened or endangered in California, but more common elsewhere

In addition, special-status species are ranked globally (G) and subnationally (S) 1 through 5 based on NatureServe's (2010) methodologies:

- G1 or S1 – Critically Imperiled Globally or Subnationally (state)
- G2 or S2 – Imperiled Globally or Subnationally (state)
- G3 or S3 – Vulnerable to extirpation or extinction Globally or Subnationally (state)
- G4 or S4 – Apparently secure Globally or Subnationally (state)
- G5 or S5 – Secure Globally or Subnationally (state)
- ? – Inexact Numeric Rank
- T – Infraspecific Taxon (subspecies, varieties, and other designations below the level of species)
- Q – Questionable taxonomy that may reduce conservation priority

WSP determined that the Study Area does not contain suitable habitat for any special-status plant species based on a various record searches as well as a pedestrian survey of the NPW pipeline alignment (see Appendix B). While 14 special-status plant species have been previously documented within a 5-mile radius by the California Natural Diversity Database (CNDDB), the project site does not contain suitable habitat for most of these species based on a variety of factors, including: developed nature of the project site, lack of suitable soils, inappropriate hydrologic conditions, and/or absence of appropriate vegetation communities. Additionally, many of the species' CNDDB occurrences are historical, dating from the early to mid-1900s and no special-status plant species were detected during the survey. Therefore, no impacts to special-status plant species would occur.

Figure 3. Typical developed public right-of-way lacking native habitat.

The Biological Resources Technical Study prepared for the Approved Project found that 14 special-status plants and 26 special-status wildlife species had been recorded in the CNDDB within a 5-mile radius of the Study Area (Rincon Consultants, Inc. 2020a). This study concluded that there was not suitable habitat to support any of the 14 sensitive plants identified in the CNDDB, and that none of the 26 special-status wildlife species would be expected to occur, or at most would have a low potential for occurrence, based on the lack of suitable undeveloped/undisturbed habitat (Rincon Consultants, Inc. 2020a). These findings were verified during the 2024 survey prepared for the Modified Project by WSP (see Appendix B). The majority of the entire FY 2024-2025 NPW Pipeline Connection Project alignment is located within fully developed areas, mostly within the existing public rights-of-way including existing paved roads and/or road shoulders. Other areas of the proposed NPW pipeline segments would cross golf courses or residential/commercial properties, areas that also lack natural habitat required by most sensitive plants and wildlife. As a result, no direct impacts to special-status species are expected as a result of the Modified Project.

There is some limited potential for native birds to nest within or adjacent to the Study Area, mainly within landscaped trees and shrubs. Native nesting birds are protected by the MBTA, BGEPA, and by sections of the California Fish and Game Code. If ground disturbance and vegetation/tree trimming or removal is required during the nesting bird season, the Modified Project may impact nesting birds through injury, mortality, or disruption of normal adult behaviors resulting in the abandonment or harm to eggs and nestlings. Construction occurring within the vicinity of nesting birds may also indirectly impact individuals with construction noise and dust. Implementation of MM BIO-1, Nesting Birds, would reduce or avoid potential impacts to nesting birds to a less-than-significant level. Per the CVMSHCP, “adjacent” means to share a common boundary with any parcel in a designated Conservation Area; although the Modified Project does not share a common boundary with a Conservation Area, construction activities associated with the Modified Project could result in various indirect impacts that could have an effect more than 500 feet away, for instance with respect to noise and dust that could disturb species within a Conservation Area. Indirect impacts from any construction or operational noise, dust, or lighting would be addressed through the implementation of Mitigation Measure BIO-2, CVMSHCP/NCCP Land Use Adjacency Guidelines from the FY 2020-2021 NPW Connections Project IS/MND, would ensure avoidance of indirect impacts to Conservation Areas, thus reducing the potential impact to a less-than-significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Mitigation Measures

Implementation of Mitigation Measures BIO-1, Nesting Birds, and BIO-2, CVMSHCP/NCCP Land Use Adjacency Guidelines from the FY 2020-2021 NPW Connections Project IS/MND, would reduce potential impacts to biological resources to a less-than-significant level:

BIO-1 Nesting Birds

Project-related activities should occur outside of the bird breeding season (typically January 1 to September 15 to account for both passerines and raptors) to the extent practicable. If construction must occur within the bird breeding season, then no more than 3 days prior to initiation of ground disturbance and/or vegetation removal, a nesting bird and raptor pre-construction survey shall be conducted by a qualified biologist within the disturbance footprint plus a 100-foot buffer (500-for for raptors), where feasible. A pre-construction survey shall also be conducted within the undeveloped area on the corner of Avenue 38 and Maidson Street, CVWD will conduct pre-construction surveys regardless of the timing of construction activities. If the Modified Project is phased or construction activities stop for more than 1 week during the nesting season, a subsequent pre-construction nesting bird and raptor survey would be required prior to re-initiation of construction during the nesting season.

Pre-construction nesting bird and raptor surveys shall be conducted during the time of day when birds are active and shall factor in sufficient time to perform this survey adequately and completely. A report of the nesting bird and raptor survey results, if applicable, shall be submitted to the lead agency for review and approval prior to ground and/or vegetation disturbance activities.

If nests are found, their locations shall be flagged. An appropriate avoidance buffer of at least 25 feet for passerines, and up to 500 feet for raptors, depending upon the species, proposed work activity, and CDFW approval, shall be determined and demarcated by a qualified biologist with bright orange construction fencing or other suitable flagging. Buffers will be determined in conjunction with CDFW through the development of a nesting bird management plan that will be submitted to CDFW for review and approval prior to the initiation of construction activities. Active nests shall be monitored at a minimum of once per week until it has been determined that the nest is no longer being used by either the young or adults. No ground disturbance shall occur within this buffer until the qualified biologist confirms that the breeding/nesting is complete and all the young have fledged. If project activities must occur within the buffer, they shall be conducted at the discretion of the qualified biologist. If no nesting birds are observed during pre-construction surveys, no further actions would be necessary.

During the pre-construction surveys, CVWD's qualified biologist will survey the 1,800-foot-long undeveloped segment of Avenue 38 for signs of burrowing owl using the recommendations and guidelines provided in the Staff Report on Burrowing Owl Mitigation. In the unlikely event that the pre-construction surveys confirm occupied burrowing owl habitat, CVWD will coordinate with CDFW and prepare a Burrowing Owl Avoidance and Monitoring Plan that shall be submitted to CDFW and the USFWS for review and approval prior to the initiation of construction activities. Avoidance measures could include the construction of a temporary visual and noise barrier (e.g.,

chain link fence with sound blankets) along the 1,800-foot-long undeveloped segment of Avenue 38, if necessary.

BIO-2 CVMSHCP/NCCP Land Use Adjacency Guidelines

The following Section 4.5 Land Use Adjacency Guidelines shall be implemented where applicable to minimize edge effects to adjacent Conservation Areas:

- **Drainage.** Proposed development adjacent to or within a Conservation Area shall incorporate plans to ensure that the quantity and quality of runoff discharged to the adjacent Conservation Area is not altered in an adverse way when compared with existing conditions. Stormwater systems shall be designed to prevent the release of toxins, chemicals, petroleum products, exotic plant materials or other elements that might degrade or harm biological resources or ecosystem processes within the adjacent Conservation Area.

- **Toxics.** Land uses proposed adjacent to or within a Conservation Area that use chemicals or generate bioproducts such as manure that are potentially toxic or may adversely affect wildlife and plant species, habitat, or water quality shall incorporate measures to ensure that application of such chemicals does not result in any discharge to the adjacent Conservation Area.

- **Lighting.** For proposed development adjacent to or within a Conservation Area, lighting shall be shielded and directed toward the developed area. Landscape shielding or other appropriate methods shall be incorporated in project designs to minimize the effects of lighting adjacent to or within the adjacent Conservation Area in accordance with the guidelines to be included in the Implementation Manual.

- **Noise.** Proposed development adjacent to or within a Conservation Area that generates noise in excess of 75 A-weighted decibels (dBA) equivalent sound level (L_{eq}) over a one hour period shall incorporate setbacks, berms, or walls, as appropriate, to minimize the effects of noise on the adjacent Conservation Area in accordance with the guidelines to be included in the Implementation Manual.

- **Invasives.** Invasive, non-native plant species shall not be incorporated in the landscape for land uses adjacent to or within a Conservation Area. Landscape treatments within or adjacent to a Conservation Area shall incorporate native plant materials to the maximum extent feasible; recommended native species are listed in Table 4-112 of the CVMSHCP/NCCP The plants listed in Table 4-113 of the CVMSHCP/NCCP shall not be used within or adjacent to a Conservation Area. This list may be amended from time to time through a Minor Amendment with Wildlife Agency Concurrence.

- **Barriers.** Land uses adjacent to or within a Conservation Area shall incorporate barriers in individual project designs to minimize unauthorized public access, domestic animal predation, illegal trespass, or dumping in a Conservation Area. Such barriers may include native landscaping, rocks/boulders, fencing, walls and/or signage.

- **Grading/Land Development.** Manufactured slopes associated with site development shall not extend into adjacent land in a Conservation Area.

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 native wildlife nursery sites?

Wildlife movement and habitat fragmentation are important issues in assessing impacts to wildlife. Habitat fragmentation occurs when a project results in a single, unified habitat area being divided into two or more areas in such a way that the division isolates the two new areas from each other. Isolation of habitat occurs when wildlife cannot move freely from one portion of the habitat to another or from one habitat type to another, as in the fragmentation of habitats within and around "checkerboard" residential development. Habitat fragmentation also can occur when a portion of one or more habitats is converted into another habitat, as when annual burning converts scrub habitats to grassland habitats.

As previously described, the Study Area for the Modified Project is located in the vicinity, but not within CVMSHCP/NCCP Conservation Areas, which constitute important wildlife habitat and corridors in the region. The Modified Project would primarily occur within previously developed and/or routinely managed areas. While the Modified Project does not share a common boundary with a Conservation Area, construction activities could result in various indirect impacts that could have an effect more than 500 feet away, for instance with respect to noise and dust that could disturb species within a Conservation Area. Nevertheless, indirect impacts from construction or operational noise would be minimized through the implementation of Mitigation Measure BIO-2, CVMSHCP/NCCP Land Use Adjacency Guidelines from the FY 2020-2021 NPW Connections Project IS/MND. As a result, the Modified Project would have a less-than-significant impact on localized and urban adapted wildlife movement and would not create habitat fragmentation or have an effect on regional wildlife movement within the region. No additional measures are recommended.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Mitigation Measures

Implementation of Mitigation Measure BIO-2, CVMSHCP/NCCP Land Use Adjacency Guidelines from the FY 2020-2021 NPW Connections Project IS/MND, would reduce potential impacts to biological resources to a less-than-significant
level.

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?

As with the Approved Project, the Modified Project is located within the CVMSHCP/NCCP plan area, but not within any specific CVMSHCP/NCCP Conservation Area. As discussed above for threshold (d), according to the CVMSHCP, "adjacent" means to share a common boundary with any parcel in a designated Conservation Area; although the Modified Project does not share a common boundary with a Conservation Area, construction of the project could result in various

indirect impacts that could have an effect more than 500 feet away, for instance with respect to noise and dust that could disturb species within a Conservation Area. The Modified Project would avoid direct impacts to this CVMSHCP/NCCP Conservation Area and would not conflict with the CVMSHCP/NCCP Conservation Objectives. CVWD would implement Mitigation Measure BIO-2, CVMSHCP/NCCP Land Use Adjacency Guidelines from the FY 2020-2021 NPW Connections Project IS/MND, to minimize or avoid indirect impacts to the CVMSHCP/NCCP Conservation Area and would not conflict with the CVMSHCP/NCCP Conservation Objectives. Potential impacts would be less than significant with mitigation.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Mitigation Measures

Implementation of Mitigation Measure BIO-2, CVMSHCP/NCCP Land Use Adjacency Guidelines from the FY 2020-2021 NPW Connections Project IS/MND, would reduce potential impacts to biological resources to a less-than-significant level.

Cultural Resources

As explained in Section 1.4, *Evaluation of Environmental Impacts*, resource areas that were found to have No Impact or Less than Significant Impact in the MND, and for which the Modified Project would also result in a finding of No Impact or Less than Significant Impact, are not analyzed further in this Addendum. This includes checklist questions (a) and (c) under Cultural Resources. The resource areas under checklist questions (b) are analyzed below:

b) Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?

WSP prepared a supplement to the Cultural Resources Investigation for the FY 2020-2021 NPW Connections Project prepared by Rincon Consultants, Inc. (2020b) (see Appendix C). The Area of Potential Effect (APE) consists of the proposed NPW pipeline segments located in the City of Palm Desert, City of Indio, and unincorporated Riverside County.

On June 28, 2024, the Eastern Information Center (EIC) of the California Historical Resources Information System (CHRIS), located at the University of California, Riverside, officially ceased operation. WSP requested a database spreadsheet of all previous cultural resources studies on U.S. Geological Survey (USGS) *Cathedral City*, *La Quinta*, *Myoma*, *West Berdoo Canyon*, and *Indio* 7.5-minute quadrangles and spreadsheets were returned the South Coast Information Center (SCIC). Based on these results WSP identified several studies that may be on or adjacent to the APE for the Modified Project and requested PDF copies of those studies.

Table 5. Previous Cultural Resources Studies on the Area of Potential Effect

Report No.	Author	Year	Title
RI-00115	Wilke, Philip J.	1973	The Springs Country Club: Expected Impact on Archaeological Resources
RI-02146	McCarthy, Daniel F.	1987	Cultural Resource Identification and Recommendations for the City of Rancho Mirage, Riverside County, California
RI-10248	Duke, Curt	2017	Historic Property Survey Report: Rancho Mirage Resignalization Project, Highway 111/Bob Hope Drive/Country Club Drive
RI-10249	Hearth, Nicholas F.	2017	Archaeological Survey Report: Rancho Mirage Resignalization Project, Highway 111/Bob Hope Drive/Country Club Drive, Federal Aid Project Number: HSIPL-5412(014)
RI-10253	Tang, Bai and Michael Hogan	2018	Historical/Archaeological Resources Survey Report: Assessor's Parcel Nos. 691-060-003 and -004, The Garden Fellowship Church Facility Project, City of Indio, Riverside County
RI-10820	Porras, Lindsey and Benjamin Vargas	2018	Phase I Cultural Study for the Coachella Valley Water District Non-Potable Connections Project

Notes: See Appendix C.

On October 7, 2024, WSP conducted a cultural resources survey of the APE. A pedestrian survey covered portions of the eastern segment of the APE where access was possible and native soils were exposed within the public rights-of-way. This mostly included areas adjacent to WRP #7, along Madison Street, portions of the Coachella Levee that were visible from Avenue 40 and the segment of Jefferson Street between Youngs Way and Avenue 39. The western and central segments consisted of a windshield reconnaissance survey, due to the developed nature of those portions of the Modified Project area.

No cultural resources were observed during the field investigation. All soil exposures identified within the eastern segment of the APE were highly disturbed. Areas in the western and central segments of the Project Area have been fully developed within the last 40 years and no native soil exposures remain in the areas associated with development.

Although ground disturbance would be approximately 5 feet deep for an approximately 3-foot-wide average trench size, much of the Modified Project area has been previously disturbed by prior development, including grading, paving, landscaping, and the installation of existing utilities. In this context, due to existing development and pavement throughout the Modified Project area, archaeological testing is not feasible prior to implementation of the Modified Project. However, the implementation of mitigation measures would ensure impacts would be less-than-significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Mitigation Measures

Implementation of Mitigation Measure CR-1, Worker's Environmental Awareness Program, and CR-2, Construction Monitoring from the FY 2020-2021 NPW Connections Project IS/MND, would reduce potential impacts to cultural resources to a less-than-significant level.

CR-1 Worker's Environmental Awareness Program

A qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service [NPS] 1983), shall conduct Worker's Environmental Awareness Program (WEAP) training on archaeological sensitivity for all construction personnel and the Native American monitor prior to the commencement of any ground-disturbing activities. Archaeological sensitivity training shall include a description of the types of cultural material that may be encountered, cultural sensitivity issues, regulatory issues, and the proper protocol for treatment of the materials in the event of a find. Protocols will include the immediate cessation of all ground disturbing activities in the vicinity of an unanticipated discovery of an archaeological resource, until the sensitivity of the resource has been assessed and subsequent actions are identified by a qualified archaeologist. A sign-in sheet for WEAP training attendees will be documented and maintained on-file.
CR-2 Construction Monitoring

During all project ground disturbance in areas with known sensitivity for cultural resources, project activities shall be observed by a qualified archaeological monitor or a qualified Native American monitor, defined as an individual from a local tribe as listed by the Native American Heritage Commission (NAHC). Daily monitoring logs with supporting photographic evidence shall be documented and maintained on-file. The qualified archaeologist or the Native American monitor, in consultation with CVWD, may recommend the reduction or termination of monitoring depending upon observed conditions (e.g., no resources encountered within the first 50 percent of ground disturbance). If archaeological or Native American resources are encountered during ground-disturbing activities, work within a minimum of 50 feet of the find must halt and the find evaluated for California Register of Historical Resources (CRHR) and National Register of Historic Places (NRHP) eligibility. Should an unanticipated resource be found as CRHR or NRHP eligible and avoidance is infeasible, additional analysis (e.g., testing) may be necessary.

Geology and Soils

As explained in Section 1.4, *Evaluation of Environmental Impacts*, resource areas that were found to have No Impact or Less than Significant Impact in the MND, and for which the Modified Project would also result in a finding of No Impact or Less than Significant Impact, are not analyzed further in this Addendum. This includes checklist questions (a) through (e) under Geology and Soils. The resource areas under checklist questions (f) are analyzed below:

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The paleontological sensitivity of the geologic units underlying the Modified Project area was previously evaluated in the MND for the FY 2020-2021 NPW Connections Project based on a desktop review of existing data, including geologic maps, published literature, and online fossil locality and collections databases.

The Society of Vertebrate Paleontology (SVP) has developed a system for assessing paleontological sensitivity and describes sedimentary rock units as having high, low, undetermined, or no potential for containing significant nonrenewable paleontological resources (SVP 2010). This criterion is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present.

The Modified Project area is situated in the Coachella Valley within the Colorado Desert geomorphic province of California (CGS 2002). The Modified Project area includes two (2) geologic units mapped at the ground surface: Quaternary young (middle to late Holocene) alluvium (Qal) and Quaternary young (middle to late Holocene) dune sand (Qs) (Rogers 1965; Dibblee and Minch 2008a and 2008b). Middle to late Holocene dune sand is composed of well-sorted, fine-to medium-grained windblown (eolian) sand and silt. Prior to development in the area, the eolian sand accumulated in significant deposits and formed widespread dunes. Middle to late Holocene dune sand overlies younger Quaternary (middle to late Holocene) alluvial deposits composed of unconsolidated to moderately consolidated, silt, sand, and clay. Within the Modified Project area, Holocene alluvium is derived primarily as fluvial deposits from the Whitewater River, which flows immediately west. However, late to middle Holocene alluvial and eolian deposits (Qal, Qs) may transition to sediments of older alluvium (Qoa) or lacustrine sediments (Ql), of early Holocene to late Pleistocene age, at unknown depths as discussed in more detail below. Quaternary old alluvium (Qoa), mapped at the surface approximately 5 miles northeast of the Project site, is described as moderately consolidated, gravel to fine-grained sand and silt by Dibblee and Minch (2008a and 2008b). Quaternary old (Pleistocene) lake deposits (Ql), mapped just southeast of the Modified Project area, represent the northernmost shoreline of the ancient Lake Cahuilla (Alles 2011; Deméré 2002; Waters 1983; Whistler et al. 1995). Quaternary Lake Cahuilla deposits are composed of weakly consolidated and interbedded sand, silt and clay, with tufa and travertine rock coatings; coarse alluvial deposits; and beach sands.

- **Holocene Alluvial and Eolian Deposits.** Middle to late Holocene sedimentary deposits (Qal, Qs) in the Project site are typically too young (i.e., less than 5,000 years old) to preserve paleontological resources and are determined to have a low paleontological sensitivity.

- **Quaternary Lake Cahuilla Deposits.** Quaternary old (Pleistocene) lacustrine deposits (Ql) derived from ancient Lake Cahuilla have yielded scientifically significant mollusk shells within the Salton Trough (Whistler et al. 1995). Fossil specimens of diatoms, spores, pollen, land plants, sponges, ostracods, freshwater gastropods, fresher bivalves, fish, and small terrestrial vertebrates have been recovered from these older Quaternary Lake Cahuilla beds. Therefore, Quaternary old lacustrine (i.e., Ql) deposits are assigned a high paleontological sensitivity.

- **Quaternary Old Alluvial Deposits.** Numerous fossil localities have been recorded from early Holocene to Pleistocene alluvial deposits throughout California, which have yielded fossil specimens of mammoth (*Mammuthus columbi*), horse (*Equus*), camel (*Camelops*), and bison (*Bison*), as well as various birds, rodents, and reptiles (Agenbroad 2003; Jefferson 1985, 2010; Merriam 1911; Paleobiology Database 2020; Savage et al. 1954; University of California Museum of Paleontology 2020). A search of the paleontological locality records at the NHMLAC resulted in no previously recorded fossil localities in the project area; however, the NHMLAC reports a vertebrate locality near the Modified Project area from early Holocene to late Pleistocene age deposits. LACM 1269 yielded a fossil specimen of horse (*Equus*) approximately seven miles north-northwest of the project area near Seven Palms Valley (McLeod 2020). The depth of recovery for this fossil locality was unreported (McLeod 2020). Therefore, Early Holocene to Pleistocene alluvial deposits (Qoa) are assigned a high paleontological sensitivity.

Accurately assessing the boundaries between younger and older units within the Modified Project area is generally not possible without site-specific stratigraphic data, some form of radiometric dating or fossil analysis, so conservative estimates of the depth at which paleontologically sensitive units may occur reduces potential for impacts to paleontological resources. According to a geochronological analysis by Waters (1983), evidence of 4,000-year-old core sample, consisting of Quaternary old (Pleistocene) lake deposits (Ql), was reported approximately 5 miles south of Indio, at a depth of 20 feet below ground surface. Based on existing site conditions, available geochronological data, and the project area's proximity to exposures of older alluvial and lacustrine deposits (i.e., Qoa and Ql), Rincon previously estimated that the transition between younger and older units in the Modified Project area is likely occur at approximately 20 feet below ground surface. Therefore, the paleontological sensitivity of the alluvial deposits within the Modified Project area is determined to be low to high, increasing at a depth of approximately 20 feet below ground surface, as defined by SVP (2010) standards.

As proposed, ground disturbance associated with the Modified Project would reach a maximum depth of 5 feet for trenching associated with the NPW pipeline segments. Although fossiliferous deposits are unlikely to occur at depths above 5 feet, the possibility cannot be excluded in the context of a fluvial deposition system. The potential for encountering fossil resources during project-related ground disturbance is low, but there remains a low potential for impacts to paleontological resources. Implementation of Mitigation Measures GEO-1 and GEO-2 from the FY 2020-2021 NPW Connections Project IS/MND during construction activities would reduce potential impacts related to paleontological resources to a less-than-significant level by providing for the recovery, identification, and curation of previously unrecovered fossils. Impacts would be less than significant with mitigation.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Mitigation Measures

Implementation of Mitigation Measure GEO-1, Worker's Environmental Awareness Program from the FY 2020-2021 NPW Connections Project IS/MND, would reduce potential impacts to cultural resources to a less-than-significant level.

GEO-1 Worker's Environmental Awareness Program

Prior to any ground disturbance associated with the Modified Project, CVWD shall retain a qualified, professional paleontologist to prepare a WEAP, which shall be used to train all site personnel prior to the start of work. The WEAP training will include at a minimum the following information:

- Review of local and state laws and regulations pertaining to paleontological resources
- Types of fossils that could be encountered during ground disturbing activity
- Photos of example fossils that could occur on site for reference
- Instructions on the procedures to be implemented should unanticipated fossils be encountered during construction, including stopping work in the vicinity of the find and contacting a qualified professional paleontologist

GEO-2 Unanticipated Discovery of Paleontological Resources

In the event an unanticipated fossil discovery is made during the course of construction, the worker shall immediately notify CVWD's construction inspector to request temporary halting of construction activity in the immediate vicinity of the fossil, and the qualified professional paleontologist shall be notified to evaluate the discovery, determine its significance, and determine if additional mitigation or treatment is warranted. Work in the area of the discovery will resume once the find is properly documented and authorization is given to resume construction work. Any significant paleontological resources found during construction monitoring will be prepared, identified, analyzed, and permanently curated in an approved regional museum repository under the oversight of the qualified paleontologist.

Hazards and Hazardous Materials

As explained in Section 1.4, *Evaluation of Environmental Impacts*, resource areas that were found to have No Impact or Less than Significant Impact in the MND, and for which the Modified Project would also result in a finding of No Impact or Less than Significant Impact, are not analyzed further in this Addendum. This includes checklist questions (a) through (e) and (g) under Hazards and Hazardous Materials. The resource areas under checklist questions (f) are analyzed below:

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction of the proposed NPW pipeline may require temporary lane or road closures to accommodate the passage of construction vehicles and equipment. The Traffic Control Plan required in Mitigation Measure TRA-2, Traffic Control Plan and Notification of Construction to Service Providers and Educational Institutions from the FY 2020-2021 NPW Connections Project IS/MND, which is presented in *Transportation* discussion below, would require safe and effective traffic control measures at all construction sites and would address potential interference with

emergency response and/or evacuation plans. With the Traffic Management Plan in place, the impact would be less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Mitigation Measures

The following mitigation measure from the FY 2020-2021 NPW Connections Project IS/MND is presented in full in the *Transportation* discussion above and would be implemented to reduce potential impacts to a less-than-significant level:

- TRA-2: Traffic Control Plan and Notification of Construction to Service Providers and Educational Institutions

Transportation

As explained in Section 1.4, *Evaluation of Environmental Impacts*, resource areas that were found to have No Impact or Less than Significant Impact in the MND, and for which the Modified Project would also result in a finding of No Impact or Less than Significant Impact, are not analyzed further in this Addendum. This includes checklist questions (c), (d), and (f) under Transportation. The resource areas under checklist questions (a), (b), and (e) are analyzed below:

a) *Conflict with an applicable plan, ordinance or policy establishing a measure of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?*

b) *Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?*

The Riverside County Transportation Commission (RCTC) is the designated Congestion Management Agency responsible for the development and implementation of the Congestion Management Program (CMP) in the Modified Project area. According to the current (2011) CMP, all regional roadways within the Project site are operating at acceptable levels of service (RCTC 2011).

Construction staging would occur primarily within existing roadways and public rights-of-way within the City of Palm Desert and the City of Indio in Riverside County. Construction activities would involve the installation of approximately 200 linear feet of NPW pipeline at a time before moving to the next segment of pipeline; installation of each 200-linear-foot segment of pipeline would be limited to a few days at most. Potential roadway lane closures would be temporary and phased as construction progresses along the NPW pipeline alignment. Construction-related vehicle trips during construction would include passenger trucks for workers traveling to and from the work areas, haul trucks (including for import and export of excavated materials, as needed), and other trucks associated with equipment and material deliveries. During peak construction

months, construction-related vehicle trips would number approximately 24 one-way trips per day. Potential local traffic impacts from this increase in vehicle traffic would be temporary, as construction activities would move along the alignment.

Due to the short-term nature of construction activities, and due to impacts moving along the NPW pipeline corridor as work progresses with each 200-linear-foot segment of pipeline installation, construction-related traffic impacts would not be substantial. However, mitigation measures have been provided for consistency with the MND for the FY 2020-2021 NPW Connections Project and the 2010 WMP Update Supplemental Program EIR, and to require the implementation of appropriate traffic controls during construction. Accordingly, potential impacts would be less than significant with mitigation incorporated.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Mitigation Measures

Implementation of Mitigation Measures TRA-1, Emergency Service Providers, TRA-2, Traffic Control Plan and Notification of Construction to Service Providers and Educational Institutions, and TRA-3 High Volume Intersections from the FY 2020-2021 NPW Connections Project IS/MND would reduce potential impacts to cultural resources to a less-than-significant level.

TRA-1 Emergency Service Providers

Prior to construction, CVWD's Project Manager shall notify emergency service providers (fire and police departments within a 0.5-mile radius of the Modified Project area) with construction contact names, locations, schedules, and traffic plans, if applicable.

TRA-2 Traffic Control Plan and Notification of Construction to Service Providers and Educational Institutions

To mitigate temporary traffic disruption and ensure public safety, CVWD and/or its construction contractor shall prepare a traffic control plan for construction areas located in or near roadways whose traffic volumes exceed Riverside County Acceptable Levels of Service or the criteria for the City of Palm Desert or the City of Indio. CVWD and/or its construction contractors shall prepare the traffic control plans. In addition, 14 days prior to commencement of project construction, construction notifications will be sent to police departments, fire departments, hospitals, and schools located within a 0.5-mile radius of the Modified Project area so that detour routes for emergency responses can be planned for the construction period.

TRA-3 High Volume Intersections

High volume intersections (those in which traffic volumes exceed city or county acceptable levels of service criteria) will be avoided if possible and identified in the Traffic Control Plan.

e) Result in inadequate emergency access?

Temporary lane closures and other potential traffic impacts caused by construction activities would have potential to impede emergency response to those areas, or to areas accessed via those routes. To ensure that project construction would not interfere with emergency response times or other public service performance objectives, the proposed Project would implement Mitigation Measures TRA-1, Emergency Service Providers, TRA-2, Traffic Control Plan and Notification of Construction to Service Providers and Educational Institutions, and TRA-3 High Volume Intersections from the FY 2020-2021 NPW Connections Project IS/MND, provided above. With implementation of these mitigation measures to address emergency access during implementation of the Modified Project, potential impacts would be less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Mitigation Measures

The following mitigation measures from the FY 2020-2021 NPW Connections Project IS/MND are presented in full in the *Transportation* discussion above and would be implemented to reduce potential impacts to a less-than-significant level:

- TRA-1: Emergency Service Providers
- TRA-2: Traffic Control Plan and Notification of Construction to Service Providers and Educational Institutions
- TRA-3: High Volume Intersections

Tribal Cultural Resources

As explained in Section 1.4, *Evaluation of Environmental Impacts*, resource areas that were found to have No Impact or Less than Significant Impact in the MND, and for which the Modified Project would also result in a finding of No Impact or Less than Significant Impact, are not analyzed further in this Addendum. The resource areas under checklist Tribal Cultural Resources questions (a) and (b) are analyzed below:

a) *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or*

b) *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 2024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

Tribal cultural resources are defined in Public Resources Code Section 21074 as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are either:

- Included or determined to be eligible for the California Register of Historical Resources

- Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1

As of July 1, 2015, California Assembly Bill (AB) 52 was enacted and expands CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that *"[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment"* (Public Resources Code Section 21084.2). AB 52 further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (Public Resources Code Section 21084.3).

AB 52 establishes a formal project consultation process for California Native American tribes and lead agencies regarding tribal cultural resources, referred to as government-to-government consultation. Pursuant to Public Resources Code Section 21080.3.1(b), the AB 52 consultation process must begin prior to release of a ND, MND, or EIR. Native American tribes to be included in the formal consultation process are those that have requested notice of projects proposed within the jurisdiction of the lead agency. AB 52 provides dedicated timeframes for inquires and responses regarding consultation and information sharing. AB 52 also provides for confidential information sharing between the governments involved for a meaningful consultation process.

Pursuant to AB 52, Native American tribes have 30 days to respond and request formal consultation. In June 2020, CVWD distributed AB 52 consultation letters for the proposed project; including project information, map, and contact information to each of the eight (8) Native American tribes previously requesting to consult on CVWD projects (Rincon Consultants, Inc. 2020b, 2020c):

- Agua Caliente Band of Cahuilla Indians
- Augustine Band of Cahuilla Indians
- Cabazon Band of Mission Indians
- La Posta Band of Mission Indians
- Morongo Band of Mission Indians
- Soboba Band of Luiseno Indians
- Torres Martinez Desert Cahuilla Indians
- Twenty-Nine Palms Band of Mission Indians

One representative from the Torres-Martinez Desert Cahuilla Indians and two representatives from the Agua Caliente Band of Cahuilla Indians requested a copy of the cultural resources technical report. Further, both contacts from the Agua Caliente Band of Cahuilla Indians requested cultural resources monitoring during any project-related ground disturbance. As a result, CVWD incorporated Mitigation Measure CR-1, *Worker's Environmental Awareness*

Program and CR-2, *Construction Monitoring* into the FY 2020-2021 NPW Connections Project IS/MND (refer to the Cultural Resources discussion above).

Section 106 consultation with local Native American Tribes conducted for the Approved Project indicated that the proposed NPW pipeline alignment is of interest to and within the Traditional Use Area of several Native American tribes. However, no specific tribal cultural resources have been identified within the Approved Project or Modified Project NPW pipeline alignment based on the records search completed at the EIC, a records search of the Sacred Lands File through the NAHC, and consultation with Native American groups under Section 106.

Nevertheless, ground disturbance associated with the Modified Project has the potential to unearth previously unknown cultural resources of Native American origin that could be considered tribal cultural resources. However, the project site is located in an area of high archaeological sensitivity and there is potential for Native American resources or human remains to be present in the project area. With project adherence to the standard permit conditions and mitigation measures from the FY 2020-2021 NPW Connections Project IS/MND described in the *Cultural Resources* discussion above, impacts would be less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Mitigation Measures

Implementation of Mitigation Measure CR-1, Worker's Environmental Awareness Program, and Mitigation Measure CR-2, Construction Monitoring from the FY 2020-2021 NPW Connections Project IS/MND, presented in the *Cultural Resources* discussion above would reduce potential impacts to tribal cultural resources to a less-than-significant level.

Wildfire

As explained in Section 1.4, *Evaluation of Environmental Impacts*, resource areas that were found to have No Impact or Less than Significant Impact in the MND, and for which the Modified Project would also result in a finding of No Impact or Less than Significant Impact, are not analyzed further in this Addendum. This includes checklist questions (b), (c), and (d) under Wildfire. The resource areas under checklist questions (a) are analyzed below:

a) *Substantially impair an adopted emergency response plan or emergency evacuation plan?*

Potential impacts of the Modified Project associated with emergency response and evacuation plans are discussed in the *Transportation* discussion above. This discussion addresses the temporary construction period impacts of trucks, vehicles, and equipment traveling to and from the Modified Project area, and determines that potential impacts associated with the potential for construction activities to interfere with emergency response times or other public service performance objectives would be less than significant with mitigation implemented to notify emergency service providers of project activities (Mitigation Measure TRA-1), develop and implement a Traffic Control Plan, and establish detour routes for emergency response during

construction activities (Mitigation Measure TRA-2). With the implementation of these mitigation measures from the FY 2020-2021 NPW Connections Project IS/MND, potential impacts associated with impairment of an adopted emergency response plan or emergency evacuation plan would be less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Mitigation Measures

The following mitigation measures from the FY 2020-2021 NPW Connections Project IS/MND are presented in full in the *Transportation* discussion above. No additional mitigation measures have been identified for this criterion.

- TRA-1: Emergency Service Providers
- TRA-2: Traffic Control Plan and Notification of Construction to Service Providers and Educational Institutions

4. CONCLUSIONS

Based on the information provided in Section 3 Evaluation of Environmental Impacts, the newly evaluated impacts of the Modified Project would not substantially alter impacts previously identified in the MND for the Approved Project. Mitigation Measures BIO-1, BIO-2, CR-1, GEO-1, GEO-2, GEO-3, TRA-1, TRA-2, and TRA-3 included in the MND would also apply to the Modified Project as identified in this Addendum and would reduce impacts of the Modified Project to less-than-significant levels. Therefore, the conclusions of this Addendum remain consistent with those made in the MND. No new significant impacts have been identified, nor is the severity of newly identified impacts substantially greater than impacts identified in the MND. No additional CEQA review is required.

5. FEDERAL CROSS-CUTTING ENVIRONMENTAL REGULATION EVALULATION

The Modified Project, as a part of the Approved Project, may receive funding from a federal program and/or a state program that also has a federal funding component. Therefore, to assist in compliance with the federal environmental requirements for the funding program, this Addendum includes analyses pertinent to several federal cross-cutting regulations (also referred to as federal cross-cutters or CEQA-Plus). The basic rules for complying with cross-cutting federal authorities are set out in the SWRCB Clean Water State Revolving Fund (CWSRF) regulations at 40 Code of Federal Regulations (CFR) §35.3145 and the U.S. Department of Agriculture (USDA) Environmental Policies and Procedures at 7 CFR §1970.

This section describes the status of compliance with relevant federal laws, EOs, and policies, and the consultation that has occurred or will occur in the near future. The topics are based on the USDA environmental policies and procedures and the SWRCB's CWSRF Program Federal Cross-cutting Environmental Regulations Evaluation Form for Environmental Review and Federal Coordination. The CWSRF Program is partially funded by the USEPA. Therefore, the SWRCB must document that projects meet the federal cross-cutter requirements.

Federal Endangered Species Act

As described in the Biological Resources discussion above, the biological resources analysis relies on the Biological Resources Technical Study for the FY 2020-2021 NPW Connections Project prepared by Rincon Consultants, Inc. (2020a) as well as an update addressing the Modified Project (see Appendix B).

As previously described, the Biological Resources Technical Study prepared for the Approved Project found that 14 special-status plants and 26 special-status wildlife species had been recorded in the CNDDB within a 5-mile radius of the Study Area (Rincon Consultants, Inc. 2020b). However, the study concluded that there was not suitable habitat to support any of the 14 sensitive plants identified in the CNDDB, and that none of the 26 special-status wildlife species would be expected to occur, or at most would have a low potential for occurrence, based on the lack of suitable undeveloped/undisturbed habitat (Rincon Consultants, Inc. 2020a). These findings were verified during the 2024 survey prepared for the Modified Project by WSP (see Appendix B). The majority of the entire FY 2024-2025 NPW Pipeline Connection Project alignment is located within fully developed areas, mostly within the existing public rights-of-way including existing paved roads and/or road shoulders. Other areas of the proposed NPW pipeline segments would cross golf courses or residential/commercial properties, areas that also lack natural habitat required by most sensitive plants and wildlife. As a result, no direct impacts to special-status species are expected.

With the implementation of Mitigation Measure BIO-1, Nesting Birds from the FY 2020-2021 NPW Connections Project IS/MND, which requires pre-construction nesting bird clearance surveys if construction activities occur during the nesting season, the Modified Project would have no effect to the federally-protected species under the ESA. The Modified Project would not jeopardize any listed species and the lead agency would be in compliance with the ESA.

National Historic Preservation Act

As described in the *Cultural Resources* discussion above, the cultural resources analysis relies on the Cultural Resources Investigation for the FY 2020-2021 NPW Connections Project prepared by Rincon Consultants, Inc. (2020b) as well as a supplement addressing the Modified Project (see Appendix C).

Although ground disturbance would be approximately 5 feet deep for an approximately 3-feet wide average trench size, much of the Modified Project area has been previously disturbed by prior development, including grading, paving, landscaping, and the installation of existing utilities. Construction activities would have no impact to existing structures. Therefore, no effects to historic properties under the NHPA for the Modified Project would be expected.

With the implementation of Mitigation Measures CR-1, CR-2, and CR-3 from the FY 2020-2021 NPW Connections Project IS/MND, which require observation by an archaeological and Native American monitor during ground disturbing activities; halting work if a resource is found until it can be evaluated; and appropriately handling resources, if discovered, the Modified Project would

not significantly impact cultural resources and would be in compliance with the NHPA. No new impact would occur as a result of the Modified Project, and no new mitigation would be required.

Archaeological and Historic Preservation Act

With the implementation of Mitigation Measures CR-1, CR-2, and CR-3 from the FY 2020-2021 NPW Connections Project IS/MND, which require observation by an archaeological and Native American monitor during ground disturbing activities; halting work if a resource is found until it can be evaluated; and appropriately handling resources, if discovered, the Modified Project would not significantly impact cultural resources and thus would be in compliance the Archaeological and Historic Preservation Act. No new impact would occur as a result of the Modified Project, and no new mitigation would be required. The Modified Project is expected to result in no effects to scientific, prehistoric, historic, and archaeological materials and data under the Archaeological and Historic Preservation Act.

Clean Air Act

"Air pollution" is a general term that refers to one or more chemical substances that degrade the quality of the atmosphere. Individual air pollutants may adversely affect human or animal health, reduce visibility, damage property, and reduce the productivity or vigor of crops and natural vegetation.

Six air pollutants have been identified by the USEPA as being of concern nationwide: carbon monoxide (CO); ozone (O_3); nitrogen dioxide (NO_2); sulfur dioxide (SO_2); lead (Pb); and particulate matter (PM), which is subdivided into two classes based on particle size, fine particles ($PM_{2.5}$) and coarse particles (PM_{10}). These pollutants are collectively referred to as criteria pollutants. The sources of these pollutants, their effects on human health and the nation's welfare, and their final deposition in the atmosphere vary considerably.

The Modified Project is located within the Salton Sea Air Basin (SSAB) which is bounded by the San Jacinto Mountains to the west, Mojave Desert to the north and east, and the Mexico border to the south. The SSAB includes Imperial County and most of the low desert areas of central Riverside County. The Riverside County portion of the SSAB, in which the Modified Project would be located, is under the regulatory jurisdiction of the SCAQMD.

Air Quality Standards and Attainment

The local air quality management agency is required to monitor air pollutant levels to ensure that National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) are met and, if they are not met, to develop strategies to meet the standards.

Depending on whether or not the standards are met or exceeded, the SSAB is classified as being in "attainment" or "nonattainment." The NAAQS and CAAQS attainment statuses for the Coachella Valley portion of the SSAB are listed in Table 6. As shown therein, the SSAB is in nonattainment for the state standards for 1-hour O_3, both the federal and state standards for 8-hour O_3 and PM_{10}. Thus, the Coachella Valley portion of the SSAB currently exceeds several

federal and state ambient air quality standards and is required to implement strategies that would reduce pollutant levels to recognized acceptable standards. The SCAQMD has adopted an AQMP that provides a strategy for the attainment of federal and state air quality standards.

Table 6. Salton Sea Air Basin (Coachella Valley) Attainment Status

Pollutant	NAAQS Designation	CAAQS Designation
1-hour O_3	Attainment	Nonattainment
8-hour O_3	Nonattainment (Severe 15)	Nonattainment
CO	Unclassified/Attainment	Attainment
NO_2	Unclassified/Attainment	Attainment
SO_2	Unclassified/Attainment	Attainment
PM_{10}	Nonattainment (Serious)	Nonattainment
$PM_{2.5}$	Unclassified/Attainment	Attainment
Lead	Unclassified/Attainment	Attainment
Hydrogen Sulfide	-	Unclassified
Sulfates	-	Attainment

Sources: USEPA 2024b; SCAQMD 2024.

In an effort to monitor the various concentrations of air pollutants throughout the SSAB, the SCAQMD has divided the region into 38 source receptor areas (SRAs) in which over 30 monitoring stations operate. The Modified Project is located within SRA 30, which covers the Coachella Valley area. Ambient air pollutant concentrations within SRA 30 are monitored in Palm Springs. The SCAQMD provides numerical thresholds to analyze the significance of a project's construction and operational emissions to regional air quality. These thresholds are designed such that a project consistent with the thresholds would not have an individually or cumulatively significant impact to the SSAB's air quality. These thresholds are listed in Table 7.

Construction Emissions

Construction activities associated with the Modified Project would generate temporary air pollutant emissions. These impacts are associated with fugitive dust and exhaust emissions from heavy construction vehicles. The excavation phase of the Modified Project would involve the largest use of heavy equipment and generation of fugitive dust. Table 8 summarizes maximum daily pollutant emissions during construction of the Modified Project.

Table 7. SCAQMD Air Quality Significance Thresholds for Coachella Valley

Pollutant	Construction Thresholds (pounds/day)	Operation Thresholds (pounds/day)
NO_x	100	55
VOC	75	55
PM_{10}	150	150
$PM_{2.5}$	55	55
SO_x	150	150
CO	550	550
Pb	3	3

Sources: SCAQMD 2023.

As shown in Table 8, construction emissions associated with the Modified Project would not exceed the SCAQMD's regional thresholds or Localized Significance Thresholds (LSTs). Therefore, impacts to regional air quality and local receptors due to construction emissions would be less than significant.

Table 8. Construction Emissions Compared to SCAQMD Thresholds

	Estimated Maximum Daily Emissions (lbs/day)					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Maximum	2.09	17.13	22.85	0.029	3.47	1.76
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	No	No	No	No	No	No
Maximum (On-Site Only)	1.51	13.68	13.02	0.02	2.45	1.46
Localized Significant Threshold (LST) (On-Site Only)	*N/A*	*132*	*878*	*N/A*	*4*	*3*
Threshold Exceeded?	No	No	No	No	No	No

Notes: See Appendix A

Operational Emissions

As described in Section 2.3.4, *Operations and Maintenance*, the delivery of NPW would require pump station operation and motor-actuated valve operation. Operation and maintenance activities associated with the Modified Project would include regular visual inspections of infrastructure and the implementation of repairs on an as-needed basis. These activities are consistent with ongoing operation and maintenance activities for CVWD's existing NPW distribution system. Consequently, operational emissions would be negligible and would have a less than significant impact on regional air quality.

General Conformity Assessment

As a required applicability analysis, a Conformity Analysis was prepared for the Modified Project. Table 9 summarizes the total annual construction emissions and compares those to the applicable *de minimis* rates for the SSAB. As shown in Table 9, the criteria air pollutant emissions associated with the Modified Project would not exceed the applicable *de minimis* rates. Therefore, the Modified Project is exempt from general conformity requirements and a formal conformity determination.

Table 9. Maximum Annual Construction Emissions Compared to De Minimis Thresholds

	Estimated Annual Emissions (tons/year)		
	VOC	NO_x	PM_{10}
Maximum	0.26	2.23	0.45
De Minims Threshold	*25*	*25*	*70*
Threshold Exceeded?	No	No	No

Coastal Zone Management Act

Neither the Approved Project nor the Modified Project is located within the coastal zone and the Coastal Zone Management Act does not apply.

Farmland Protection Policy Act

The proposed NPW pipeline corridor is not currently in agricultural production and does not contain Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or land with a Williamson Act contract (Department of Conservation 2024). No project components are located on forest land or timber land (County of Riverside 2015).

The project would also not cause the loss of forest land or conversion of forest land to non-forest use. Due to the absence of agricultural land at the project site or in the surrounding area, the project would not involve changes to the existing environment which could result in conversion of Farmland to a non-agricultural use. No impact to agricultural or forest resources would occur and the Modified Project would comply with the Farmland Protection Policy Act.

EO 11988 – Floodplain Management, as amended by EOs 12148 and 13690

Neither the Approved Project nor the Modified Project is located within or adjacent to a Federal Emergency Management Agency (FEMA) 100 or 500-year flood zone. The majority of the FY 2024-2025 NPW Pipeline Connection Project alignment is located within fully developed areas, mostly within the existing public rights-of-way including existing paved roads and/or road shoulders. Other areas of the proposed NPW pipeline segments would cross golf courses or residential/commercial properties.

Neither construction nor operation and maintenance of the Modified Project would result in alteration of the course of a stream or river, or introduce substantial new impervious areas. The construction activities associated with the Modified Project would temporarily disturb both paved and unpaved areas and would alter site-specific drainage patterns (e.g., during trenching to install the new NPW pipeline). However, this disturbance would be temporary and limited to the construction period for each 200-linear-foot section of NPW pipeline. During construction, a project-specific SWPPP would be implemented to minimize or avoid potentially adverse effects associated with ground disturbing activities. After construction-related ground disturbance, all disturbed areas would be restored to pre-construction conditions, and no permanent alterations to the drainage patterns along the pipeline alignments would occur. Therefore, no changes in type or severity of impacts are anticipated. The Modified Project would have no effect on flood zones and would be in compliance with EO 11988.

Federal MBTA, BGEPA, and EO 13168

As described in the *Biological Resources* discussion above, there is some limited potential for native birds to nest within or adjacent to the Study Area, mainly within landscaped trees and shrubs. Native nesting birds are protected by the MBTA, and by sections of the California Fish and Game Code. If initial ground disturbance and vegetation/tree trimming or removal is required

during the nesting bird season, the Modified Project may impact nesting birds through injury, mortality, or disruption of normal adult behaviors resulting in the abandonment or harm to eggs and nestlings. Construction occurring within the vicinity of nesting birds may also indirectly impact individuals with construction noise and dust. Implementation of MM BIO-1, Nesting Birds, would reduce or avoid potential impacts to nesting birds to a less-than-significant level. Per the CVMSHCP, "adjacent" means to share a common boundary with any parcel in a designated Conservation Area; although the project does not share a common boundary with a Conservation Area, construction activities associated with the Modified Project could result in various indirect impacts that could have an effect more than 500 feet away, for instance with respect to noise and dust that could disturb species within a Conservation Area. Indirect impacts from any construction or operational noise, dust, or lighting would be addressed through the implementation of Mitigation Measure BIO-2, CVMSHCP/NCCP Land Use Adjacency Guidelines from the FY 2020-2021 NPW Connections Project IS/MND, would ensure that there would be no effect and the lead agency would be in compliance with the federal MBTA, BGEPA, and EO 13168.

Fish and Wildlife Coordination Act

The Modified Project would not impound, divert, or control a surface water source. Operation of the Modified Project would not substantially decrease groundwater supplies or interfere with groundwater recharge such that there would be an effect on fish and wildlife resources. Therefore, the Modified Project would not conflict with the Fish and Wildlife Coordination Act.

EO 11990 – Protection of Wetlands

The NPW pipeline associated with the Modified Project does not support federally protected wetlands as defined by Clean Water Act Section 404 and no waters or wetlands potentially subject to the jurisdiction of the U.S. Army Corps of Engineers (USACE), RWQCB, or CDFW are located within the Modified Project area. Therefore, there would be no impact to wetlands and the lead agency would be in compliance with EO 11990.

EO 13112 – Invasive Species

The Modified Project would implement construction BMPs that suppress dust and contain sedimentation and runoff from the site (see Section 2.3.3, *Construction Best Management Practices*). In areas where revegetation is required, use of native species would be required, per the project-specific SWPPP, to ensure that introduction of invasive species does not occur. The lead agency would therefore be in compliance with EO 13112.

Wild and Scenic Rivers Act

There are no designated Wild and Scenic Rivers in the vicinity of the Modified Project, nor would any designated rivers be affected by the Modified Project. Therefore, the Modified Project would not result in any impacts related to the Wild and Scenic Rivers Act.

Safe Drinking Water Act, Sole Source Aquifer Program

Within USEPA Region 9, which includes California, there are nine sole source aquifers. None of these sole source aquifers are located within the vicinity of the Modified Project. Therefore, the Sole Source Aquifer Program does not apply to the Modified Project, and the lead agency would be in compliance with Section 1424(e) of the Safe Drinking Water Act.

EO 13195 – Trails for America in the 21st Century

The Modified Project would have no effect on trails and the lead agency would be in compliance with EO 13195.

EO 13007 – Indian Sacred Sites

As described in the *Tribal Cultural Resources* discussion above, AB 52 consultation is complete and consisted of communication with one Native American Tribe whose recommendations have been acknowledged by Mitigation Measures CR-1 and CR-2 from the FY 2020-2021 NPW Connections Project IS/MND.

In addition, Section 106 consultation with local Native American tribes is of interest to and within the Traditional Use Area of several Native American tribes. However, no specific tribal cultural resources have been identified within the Approved Project or Modified Project NPW pipeline alignment based on the records search completed at the EIC, a records search of the Sacred Lands File through the NAHC, and consultation with Native American groups under Section 106. Nevertheless, ground disturbance associated with the Modified Project has the potential to unearth previously unknown cultural resources of Native American origin that could be considered tribal cultural resources. However, the project site is located in an area of high archaeological sensitivity and there is potential for Native American resources or human remains to be present in the project area. No new impact would occur as a result of the Modified Project, and no new mitigation would be required. The lead agency would be in compliance with EO 13007.

Magnuson-Stevens Fishery Conservation and Management Act

The Modified Project would have no impact on resident or migratory fish or fish habitat and the lead agency would be in compliance with the Magnuson-Stevens Act.

Rivers and Harbors Act, Section 10

The Modified Project area does not include a water body that is considered a Traditionally Navigable Water by the USACE and construction of the Modified Project would not require a Section 10 permit. Therefore, the Modified Project would have no impact and would be in compliance with the Rivers and Harbors Act.

Wilderness Act

The Modified Project is not located within a designated wilderness area. Similar to the Approved Project, the effects of the Modified Project would be limited to the immediate Modified Project vicinity and would not extend to wilderness areas or federally managed lands. Therefore, the Modified Project would have no effect on wilderness areas and the lead agency would be in compliance with the Wilderness Act.

Environmental Justice

This section describes the existing socioeconomic resources within the vicinity of the Modified Project and the regulatory setting pertaining to environmental justice-related issues. This section also evaluates the potential for the Modified Project to disproportionately affect minority or low-income groups. The USEPA defines environmental justice as:

> *"The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means no group of people, including racial, ethnic, or economic groups should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs, and policies"* (USEPA 2022).

According to USEPA guidelines, a minority population is present in a study area if the minority population of the affected area exceeds 50 percent, or if 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.

The Modified Project would be located in the City of Palm Desert, City of Indio, and unincorporated Riverside County. According to the USEPA's Environmental Screening and Mapping Tool (USEPA 2024a), the central segment of the NPW pipeline is within the 50-80 percentile for minority population. Additionally, the eastern segment is within the 80-90 percentile. Therefore, similar to the Approved Project, a portion of the Modified Project would occur within a minority population exceeding 50 percent.

USEPA guidelines recommend that analyses of low-income communities consider the US Census Bureau's poverty level definitions, as well as applicable State and regional definitions of low-income and poverty communities. According to the 2017 to 2021 American Community Survey 5-Year Estimates, 12.9 percent of people in the City of Palm Desert and 13.2 percent of people in City of Indio are considered to be in poverty (U.S. Census Bureau 2022a, 2022b). In comparison, the percentage of persons in poverty for the entire State of California was 12.0 percent for the same time period (U.S. Census Bureau 2023).

The California Department of Water Resources (DWR) defines a Disadvantaged Community (DAC) as a community with a median household income (MHI) less than 80 percent of the California MHI, and a Severely Disadvantaged Community (SDAC) as a community with an MHI

less than 60 percent of the California MHI. To identify the location of DAC and SDAC communities for its mapping tool, DWR (DWR 2024), relies on 2016-2020 American Community Survey data, which defines the Statewide MHI as $78,672. A DAC would therefore be a community with an MHI of $62,938 or less and an SDAC would be a community with an MHI of $47,203 or less. According to the DWR Mapping Tool a small NPW pipeline segment along Portola Avenue would be located within a DAC. No other NPW pipeline segments associated with the Modified Project would be located within a DAC or SDAC

Impact Analysis

For the purposes of this analysis, an environmental justice impact would be significant if the Modified Project would directly, indirectly, or cumulatively cause disproportionately high and adverse impacts to minority or low-income populations. High and adverse impacts are considered those that are found to be significant environmental impacts in this Addendum (when compared to relevant thresholds of significance for a given resource). As described in Section 3, *Evaluation of Environmental Impacts*, all potential impacts of the Modified Project would be mitigated to a less-than-significant level.

Similar to the Approved Project, construction of the Modified Project would result in temporary impacts (e.g., dust, traffic, and noise) that would cease upon completion of construction. Where potential impacts would occur, previously adopted mitigation measures from the MND would be implemented to reduce such effects to a less-than-significant level. Once operational, the Modified Project would consist of below-ground pipelines that would not create any permanent impact. Therefore, the Modified Project would not result in any disproportionately high adverse impacts on minority or low-income communities and no environmental justice impacts would occur.

6. ALTERNATIVES ANALYSIS

This project may receive federal funding through the SWRCB. The following environmental alternatives analysis has been prepared to comply with the Environmental Package component of the Financial Assistance Application. This analysis addresses the following elements:

- Range of feasible project alternatives that each meet the applicant's project needs and objectives, as well as a "no project/no action" alternative;
- Comparative environmental analysis among the project alternatives that includes discussions of beneficial and adverse environmental impacts on the existing environment, future environment, and individual sensitive environmental issues identified through project management or public participation;
- Analysis of direct, indirect, and cumulative impacts on sensitive environmental resources;
- Potential reasonably foreseeable future environmental impacts;
- Appropriate mitigation measures not already included in the proposed action or alternatives, if appropriate, to mitigate adverse environmental impacts; and

- Thorough discussions of the environmental reasoning for selection of the chosen alternative for the project.

6.1. Alternative Evaluated

In response to direction provided by the SWRCB, two environmental alternatives are analyzed herein:

Non-Recycled Water Alternative: The non-recycled water supply alternative would continue pumping of groundwater for delivery to the five customers described above in the proposed Project. To maintain groundwater basin balance, CVWD would continue to acquire supplemental water supplies to recharge the Indio Subbasin. Supplemental supplies might include State Water Project (SWP) transfers from other agencies, new reservoir projects, or other wet season transfers. CVWD actively replenishes the groundwater basin with SWP water, either exchanged with Metropolitan for Colorado River water or from its own Colorado River water entitlement. Another potential source of supplemental water is the Sites Reservoir Project. The Sites Reservoir Project would capture and store stormwater flows from the Sacramento River for release in dry years. The current price of water from the Sites Reservoir Project is in the range of $1,300/AF. CVWD would need to purchase 3,373 AFY to maintain groundwater basin balance, which would equate to an annual cost of approximately $4.4M. Delivery of the Sites Reservoir Project as a reliable SWP component remains uncertain. Under the Non-Recycled Water Alternative, the WRP #10 effluent would continue to be percolated into the Indio Subbasin via onsite ponds. Future requirements relating to effluent disposal via percolation may include additional restrictions on total nitrogen effluent concentrations.

- **No Project/No Action Alternative:** Under the No Project/No Action Alternative the additional 34,200 linear feet of NPW pipeline described for the Modified Project would not be installed. CVWD's WRP #7 and WRP #10 NPW services would not be expanded to add new NPW customers. The No Project/No Action Alternative would not support the goals of the Coachella Valley Water Management Plan (refer to Section 1.1.1, *Coachella Valley Water Management Plan*).

Table 10 provides a comparison between the potential environmental impacts of the three alternatives with regard to the resource topics addressed in CEQA Appendix G, *Environmental Checklist*, as well as the applicable federal cross-cutters.

Table 10. Comparison of Alternatives – Environmental Impacts

Issue Areas	Modified Project		Non-Recycled Water Alternative	No Project / No Action Alternative
	Addendum Findings	With Mitigation		
Biological Resources				
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 Wildlife or U.S. Fish and Wildlife Service?	Potentially Significant Impacts	Less than Significant	Less than Significant	No Impact
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 native wildlife nursery sites?	Potentially Significant Impacts	Less than Significant	Less than Significant	No Impact
Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	Potentially Significant Impacts	Less than Significant	Less than Significant	No Impact
Cultural Resources				
Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?	Potentially Significant Impacts	Less than Significant	Less than Significant	No Impact
Geology and Soils				

Issue Areas	Modified Project		Non-Recycled Water Alternative	No Project / No Action Alternative
	Addendum Findings	With Mitigation		
Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Potentially Significant Impacts	Less than Significant	Less than Significant	No Impact
Hazards and Hazardous Materials				
Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Potentially Significant Impacts	Less than Significant	Less than Significant	No Impact
Transportation				
Conflict with an applicable plan, ordinance or policy establishing a measure of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?	Potentially Significant Impacts	Less than Significant	Less than Significant	No Impact

Issue Areas	Modified Project		Non-Recycled Water Alternative	No Project / No Action Alternative
	Addendum Findings	With Mitigation		
Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	Potentially Significant Impacts	Less than Significant	Less than Significant	No Impact
Result in inadequate emergency access?	Potentially Significant Impacts	Less than Significant	Less than Significant	No Impact
Tribal Cultural Resources				
Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	Potentially Significant Impacts	Less than Significant	Less than Significant	No Impact
A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 2024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Potentially Significant Impacts	Less than Significant	Less than Significant	No Impact
Wildfire				

Issue Areas	Modified Project		Non-Recycled Water Alternative	No Project / No Action Alternative
	Addendum Findings	With Mitigation		
Substantially impair an adopted emergency response plan or emergency evacuation plan?	Potentially Significant Impacts	Less than Significant	Less than Significant	No Impact

Notes: As described in Section 1.5, *Summary of Findings*, the conclusions and mitigation measures in the MND for the FY 2020-2021 NPW Connections Project (SCH No. 2020100292) are applicable to the Modified Project. The impact analysis in this addendum and the summary provided in Table 10 focuses on the issue areas with potentially significant impacts. The other issue areas were found to have No Impact or Less than Significant Impact in the MND.

6.2. Selected Alternative

The Modified Project would have less environmental impact compared to the No Action Alternative related to agriculture and forestry, energy, greenhouse gas emissions, hydrology and water quality, land use and planning, and utilities and service systems (refer to the MND for the FY 2020-2021 NPW Connections Project for a complete discussion of these issue areas) the because the No Action Alternative would involve operation of future advanced treatment facilities, continued use of groundwater for golf course irrigation, continued import of surface water to replenish the basin, and no expansion in delivery of recycled water. The Modified Project would have greater environmental impact than the No Action Alternative related to air quality, biological resources, cultural resources, hazards and hazardous materials, transportation and traffic, tribal cultural resources, and wildfire response because it would involve a larger temporary construction area of impact than the future WRP-10 improvements associated with the No Action Alternative. The No Action Alternative would not meet either of the project objectives.

While the Non-Recycled Water Alternative would deliver groundwater to the five customers; however, it would not meet the goals set forth in the WMP (refer to Section 2.1, *Purpose of the Project*). The Non-Recycled Water Alternative would not contribute to existing CVWD efforts to reduce groundwater overdraft. Additionally, as previously described, the WRP #10 effluent would continue to be percolated into the Indio Subbasin via onsite ponds. Future requirements relating to effluent disposal via percolation may include additional restrictions on total nitrogen effluent concentrations.

The Modified Project is the recommended alternative because it is cost-effective (see Table 11), serves the greatest demand, and achieves supports the goals of the Coachella Valley Water Management Plan.

Table 11. Alternatives Cost Comparison

Cost	Modified Project	Non-Recycled Water Alternative	No Project Alternative
Capital Cost	$33,000,000	-	$182,160,000
Annualized Capital Cost	$1,540,000	-	$7,780,000
Annual O&M Cost	$20,000	$4,400,000	$19,840,000
Total Annual Cost	$1,560,000	$4,400,000	$27,620,000
Yield (AF)	3,373	3,373	16,800
Cost per AF	$462	$1,300	$1,640

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