

Appendix NOP

NOP and Scoping Process

The Appendices herein contain supporting information referenced in the Environmental Impact Report. These appendices contain highly detailed figures and other graphic information which are difficult to translate for screen reading software; therefore, the Appendices have not been translated into an auditory format. If you have a disability and/or have difficulty accessing any material in this document, please contact us by mail, email, or telephone, and we will work with you to make all reasonable accommodations. Please indicate 1) the nature of the accessibility need; 2) your preferred format; 3) the material you are trying to access and its location within this document; and 4) how to reach you if questions arise while fulfilling your request. You can direct your requests to William Patterson (wpatterson@cvwd.org).

WRP 4 EIR NOP Summary

Notice of Preparation and Scoping Period

Pursuant to CEQA Guidelines Section 15082, the lead agency is required to send a Notice of Preparation (NOP) stating that an EIR will be prepared to the State Office of Planning and Research (OPR) and responsible and trustee agencies. On October 12, 2023, CVWD published a NOP of an EIR for a 30-day review period and circulated it to OPR and local, state, and federal agencies, including responsible and trustee agencies, as well as organizations and persons who expressed interest in the proposed project (**Attachment 1**). The NOP provided a general description of the proposed project, a description of the proposed project area, and a detailed Initial Study providing initial analysis of environmental topics that will be evaluated within the EIR. The NOP was made available at CVWD’s office, located at 75515 Hovley Lane East, Palm Desert, California 92211, as well as at the Coachella Branch Public Library, located at 1500 6th Street, Coachella CA, 92236; the Mecca Library, located at 91260 66th Avenue, Mecca, CA 92254; and the La Quinta Library, located at 78275 Calle Tampico, La Quinta CA, 92253. The NOP was also available online at the CVWD Web Site (<https://www.cvwd.org/642/Water-Reclamation-Plant-No-4-WRP-4-Non-P>). One scoping meeting was held for the NOP on November 1, 2023, to receive comments and suggestions about issues to be included in the EIR. The sign-in sheet is included as **Attachment 2**.

Comments

Table 1 below includes a list of the agencies and individuals that submitted comments during the 30-day project scoping period (see **Attachment 3**). CVWD also received verbal comments during the scoping meeting, which have been recorded as **Attachment 4**. CEQA does not require CVWD to formally respond to these comments, but rather to consider these comments during preparation of the EIR.

**TABLE 1:
LIST OF COMMENTERS**

Commenter	Date Received
Native American Heritage Commission	10/13/23
Riverside County Flood Control & Water Conservation District	10/23/23
South Coast Air Quality Management District	10/24/23
Agua Caliente Band of Cahuilla Indians	10/31/23
South Coast Air Quality Management District	11/7/23
State Water Resources Control Board	11/8/23
Alianza Coachella Valley, Audubon California, Leadership Counsel for Justice & Accountability, Pacific Institute, and the Sierra Club	11/13/23
California Department of Fish and Wildlife	11/13/23
Imperial County Planning & Development Services	11/20/23

List of Attachments

This Scoping Summary contains documents pertinent to the scoping process. The following items are included:

Attachment 1: Notice of Preparation

Attachment 2: Scoping Meeting Sign-in Sheets

Attachment 3: Comment Letters Received by CVWD

Attachment 4: Scoping Meeting Verbal Comments

Attachment 1: Notice of Preparation

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND NOTICE OF SCOPING MEETING

DATE: October 12, 2023

TO: Responsible Agencies, Trustee Agencies, Interested Parties

LEAD AGENCY: Coachella Valley Water District

PROJECT TITLE: Water Reclamation Plant No. 4 Non-Potable Water Improvements Project

PUBLIC REVIEW PERIOD: October 12, 2023 through November 13, 2023

This Notice of Preparation (NOP) has been prepared to notify agencies and interested parties that Coachella Valley Water District (CVWD), as the lead agency pursuant to the California Environmental Quality Act (CEQA), is preparing an Environmental Impact Report (EIR) for the Water Reclamation Plant No. 4 (WRP 4) Non-Potable Water (NPW) Improvements Project (proposed project). The EIR will tier from CVWD's Sanitation Master Plan Update 2020 Final Program EIR (PEIR) (2020 SMP PEIR) (SCH No. 2019090307), referring to and relying on the analysis of the previous PEIR where appropriate pursuant to CEQA Guidelines Section 15168. CVWD is soliciting comments from responsible and trustee agencies as well as interested parties as to the scope and content of the environmental information to be included in the EIR. In accordance with CEQA, agencies are requested to review the project description provided in this NOP and provide comments on environmental issues related to the statutory responsibilities of the agency. The EIR will be used by CVWD when considering approval of the proposed project as well as any related discretionary approvals.

POTENTIAL ENVIRONMENTAL IMPACTS: The EIR will assess and disclose the reasonably foreseeable direct, indirect, and cumulative impacts that would likely result from the construction and operation of the proposed project. An Initial Study prepared pursuant to CEQA Guidelines Section 15063 is included as **Attachment A**. Based on the analysis included in the Initial Study, the EIR will evaluate the following resources listed in Appendix G of the CEQA Guidelines: Aesthetics, Agriculture, Air Quality, Biological Resources, Cultural Resources, Energy, Hazardous Materials, Hydrology, Geology and Soils, Land Use, Noise, Transportation, Tribal Cultural Resources, and Cumulative Effects. The EIR will identify mitigation measures if necessary to avoid, minimize, and offset potentially significant impacts of the project. The EIR also will evaluate alternatives to the proposed project that would avoid, or substantially lessen potentially significant impacts of the project while attempting to meet the objectives of the proposed project.

Due to the time limits mandated by State law, all comments to the NOP must be received by CVWD no later than 30 days after publication of this notice. The response deadline is **4:00 p.m. on November 13, 2023.** Please send your written comments to the mailing address or email address shown below. Include a return address or email address and a contact name for your agency or party with your comments.

CONTACT:

Coachella Valley Water District
75515 Hovley Lane East
Palm Desert, California 92211
Attn: William Patterson, Environmental Supervisor
WPatterson@cvwd.org
(760) 398-2651

PROJECT LOCATION: WRP 4 is located southeast of Avenue 62 on Filmore Street in Thermal, CA, an unincorporated area of Riverside County. The property is bordered by Avenue 62 on the north, Avenue 64 on the south, Filmore Street on the west, and by the Coachella Valley Stormwater Channel (CVSC) on the east. The site has a stormwater berm running along the north edge of the property near avenue 62 and along the west side, parallel to Filmore Street. Running parallel to Avenue 64 is a stormwater collection channel that carries shallow groundwater, irrigation return flows, and precipitation runoff from properties north of Avenue 64 to the CVSC.

BACKGROUND: CVWD provides services for water, wastewater, recycled water, irrigation/drainage, regional stormwater protection and groundwater management to the Coachella Valley. CVWD currently operates five WRPs (WRP 1, 2, 4, 7 & 10) in Coachella Valley to treat wastewater influent. WRP 4 currently provides secondary treatment to wastewater collected from as far east as Cathedral City and as far north as Thousand Palms. WRP 4 has a design capacity of 9.9 million gallons per day (MGD) and currently treats an average daily flow of approximately 5.7 MGD. The treated effluent is discharged to the CVSC.

Based on CVWD's Sanitation Master Plan, growth in the WRP 4 service area is expected to increase plant influent flows to 20 MGD by 2045. In response to this growth, CVWD has planned several projects to expand WRP treatment capacity to meet future demands and to enable 100 percent of the effluent to be reused, ultimately eliminating the discharge to the CVSC. WRP 4 is not currently producing or delivering recycled water. The proposed project would enable CVWD to provide recycled water, compliant with California Code of Regulations Title 22 to agricultural customers in the eastern portion of Coachella Valley in the vicinity of the WRP 4 treatment facility.

Currently, WRP 4 effluent is discharged to the CVSC pursuant to Order R7-2017-006 and NPDES Permit No. CA104973. CVWD submitted a Wastewater Change Petition (WW0093) to the State Water Resources Control Board (State Water Board) in 2016 to divert flows to agricultural irrigation, reducing the demand on local groundwater. This EIR will evaluate environmental impacts of the waste discharge change petition, including but not limited to an analysis of reduced discharge to receiving waters and increased recycled water use.

PROJECT DESCRIPTION: The proposed project would construct tertiary treatment facilities within the existing WRP 4 plant site to enable production of up to 10 MGD of non-potable recycled water for irrigation. CVWD has developed three phases to achieve 10 MGD production and distribution:

- Phase 1 would include construction and operation of a 1-MGD packaged cloth disk filtration system and an ultraviolet (UV) disinfection treatment plant as part of an overall treatment facility incorporating infrastructure expandable to 2.5 MGD. CVWD would construct a new reservoir

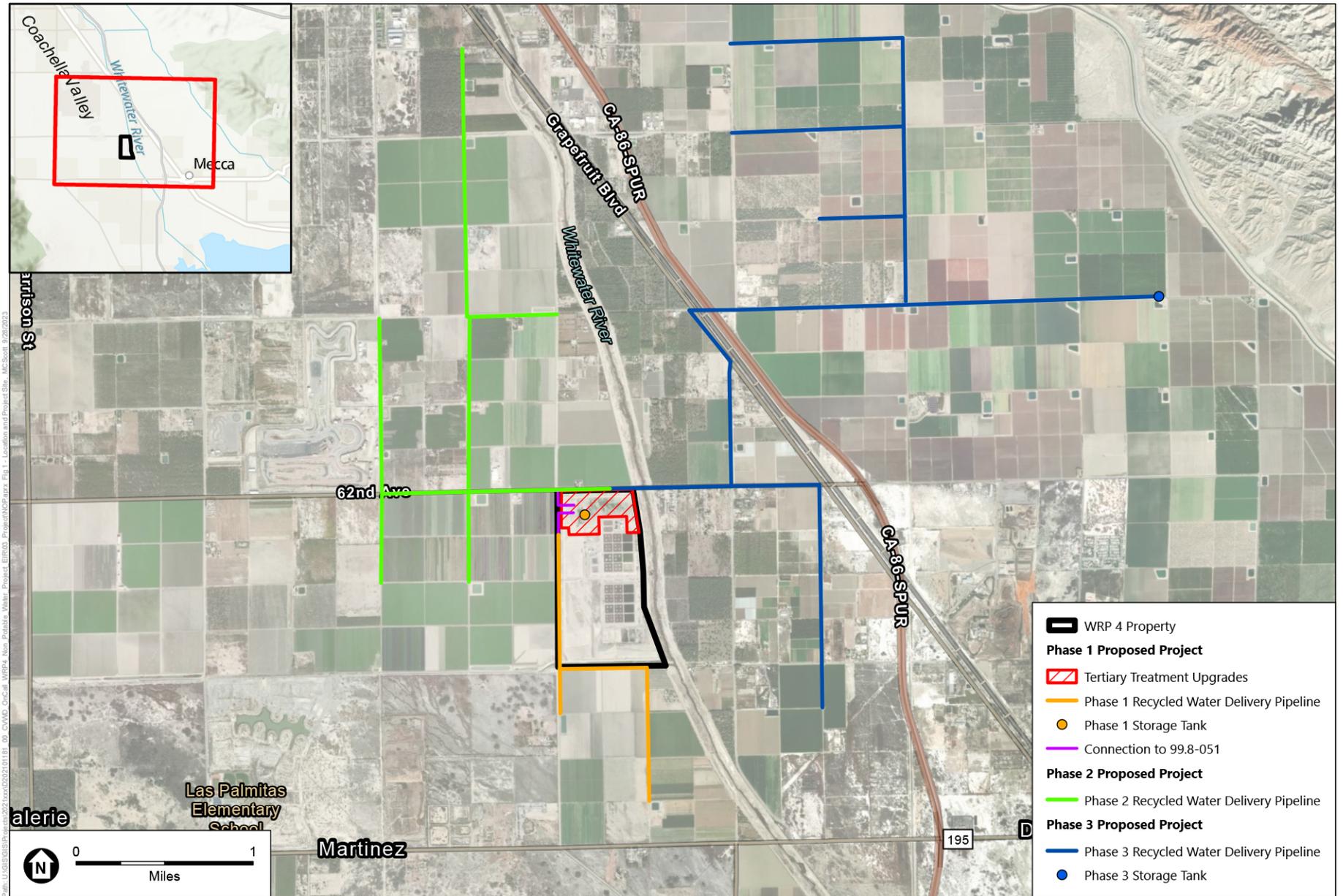
serving as a regulatory structure within WRP 4 and repurpose an existing irrigation pipeline to deliver a blend of recycled water and canal water to customers located south of WRP 4.

- Phase 2 would incorporate additional equipment at WRP 4 to treat up to 2.5 MGD of tertiary treated recycled water, with onsite infrastructure expandable to 10 MGD, and construction of new distribution pipelines to deliver 2.5 MGD of recycled water.
- Phase 3 would increase treatment capacity at WRP 4 to up to 10 MGD. Similar to Phase 2, new recycled water delivery pipelines would be constructed to accommodate delivery of 10 MGD to agricultural customers.

Figure 1 shows the project location and the Phase 1, 2, and 3 project sites.

Construction of Phase 1 of the proposed project would begin in July 2025 and be completed at the end of 2027. Near the end of construction, testing and startup activities would commence with the system distributing recycled water to customers in 2028.

SCOPING MEETING: An open-house style public scoping meeting is scheduled for **6:00 p.m. on Wednesday, November 1st** to receive comments and suggestions about issues to be included in the EIR. The meeting will be held at CVWD's Steve Robbins Administrative Building located at 75515 Hovley Lane East in Palm Desert. The public scoping meeting will include a brief presentation providing an overview of the proposed project. After the presentation, public comments will be accepted.



SOURCE: ESA, 2022

CVWD WRP No. 4 Project

Figure 1
Project Location and Proposed Project Site

ATTACHMENT A

Initial Study

Introduction

Pursuant to Section 15063 of the California Environmental Quality Act (CEQA) Guidelines (Title 14, California Code of Regulations, Sections 15000 et seq.), an Initial Study is a preliminary environmental analysis that is used by the lead agency as a basis for determining whether an EIR, a Mitigated Negative Declaration, or a Negative Declaration is required for a project. This Initial Study has been prepared to determine whether the proposed Water Reclamation Plant No. 4 (WRP 4) Non-Potable Water (NPW) Improvements Project (proposed project) may cause significant effects on the environment that were not adequately addressed in the Coachella Valley Water District (CVWD) Sanitation Master Plan Update 2020 Final Program EIR (PEIR) (2020 SMP PEIR) (SCH No. 2019090307). The analysis in this Initial Study determined that an EIR would be the appropriate CEQA document.

Environmental Setting

CVWD's service area covers approximately 1,000 square miles from the San Geronio Pass to the Salton Sea, mostly within the Coachella Valley in Riverside County, California. CVWD's service boundary also extends into small portions of Imperial and San Diego counties. The proposed project is located in the Coachella Valley in southern California, within CVWD's service area, located approximately 130 miles east of the City of Los Angeles and 140 miles northeast of the City of San Diego. The topography of the service area is valley-centered, with a mild slope generally following the Coachella Valley Stormwater Channel, which bisects the Coachella Valley as it flows from the west to the east/southeast, discharging to the Salton Sea. The Salton Sea generally forms the southern boundary of the CVWD service area, with the Chocolate Mountains on the east and the Santa Rosa Mountains on the west. The southern tip of the San Bernardino Mountains forms the northern extent of the service area.

WRP 4 is located southeast of Avenue 62 on Filmore Street in Thermal, CA, an unincorporated area of Riverside County. The property is bordered by Avenue 62 on the north, Avenue 64 on the south, Filmore Street on the west, and by the Coachella Valley Stormwater Channel (CVSC) on the east. The site has a stormwater berm running along the north edge of the property near avenue 62 and along the west side, parallel to Filmore Street. Running parallel to Avenue 64 is a stormwater collection channel that carries irrigation and precipitation runoff from properties north of Avenue 64 to the CVSC.

CEQA Tiering Process

Section 15168(d) of the State CEQA Guidelines provides for simplifying the preparation of environmental documents on individual parts of the program by incorporating by reference analyses and discussions that apply to the program as a whole. Where an EIR has been prepared or certified for a program or plan, the environmental review for a later activity consistent with the program or plan should be limited to effects that were not analyzed as significant in the prior EIR or that are susceptible to substantial reduction or avoidance (CEQA Guidelines Section 15152[d]). The State CEQA Guidelines

further provide that where a later activity would have effects that were not examined in the program EIR as provided in Section 15152, a new Initial Study would need to be prepared leading to either an EIR or Negative Declaration (CEQA Guidelines Sections 15168[c]).

The environmental analysis in this Initial Study is tiered from the 2020 SMP PEIR in accordance with Sections 15152 and 15168 of the State CEQA Guidelines. The 2020 SMP PEIR was prepared pursuant to Section 15168 of the State CEQA Guidelines. The 2020 SMP PEIR provides a long-term, comprehensive capital improvement program (CIP) consisting of recommendations to refurbish or replace existing assets, optimize operations, and satisfy projected capacity needs of all sanitation facilities (collection system including gravity pipelines, force mains, lift stations, and the five water reclamation plants [WRPs]) to be implemented between 2020 to 2040 in CVWD's service area. This document incorporates by reference the discussions in the 2020 SMP PEIR and concentrates on proposed project-specific issues.

Environmental Factors Potentially Affected

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

- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> Aesthetics | <input checked="" type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Energy |
| <input checked="" type="checkbox"/> Geology/Soils | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards & Hazardous Materials |
| <input checked="" type="checkbox"/> Hydrology/Water Quality | <input checked="" type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input checked="" type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial study:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Prepared by: Andray Cardoza 10/5/23
 Andray Cardoza Date
 Task Lead/Environmental Planner
 Environmental Science Associates

Reviewed by: William Patterson 10/5/23
 William Patterson Date
 Environmental Supervisor
 Coachella Valley Water District

Environmental Checklist

Aesthetics

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Project Impact Adequately Addressed in SMP PEIR</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
I. AESTHETICS — Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The analysis of aesthetics is tiered from the 2020 SMP PEIR and was addressed in Section 2.4, CEQA Overview, of that document. The 2020 SMP PEIR found impacts to aesthetics for all Master Plan projects not to be significant because proposed improvements to existing sanitation facilities would not significantly affect scenic resources, as they are already a part of the existing landscape. The proposed pipelines would be located underground and predominantly within the right-of-way (ROW) of existing roadways and would not be visible. Aesthetic impacts were found not to be significant and not discussed further in the PEIR (CVWD 2022). The analysis in this section is supplemented by information specific to the proposed project.

- a) **Potentially Significant Impact.** Views in the project area consist mainly of residential and agricultural land uses, public facilities, open space and distant mountains vistas. As discussed in Section 2.4 of the 2020 SMP PEIR, proposed improvements to existing sanitation facilities would not significantly affect scenic resources as they are already part of the existing landscape. The proposed recycled water pipelines would be located underground and would not be visible following construction. One off-site storage tank would be constructed at the high point of the Phase 3 distribution system to the east of WRP 4. The tank would be located an agricultural area sparsely used by the public and would be constructed at a height that would not obstruct or affect scenic views of mountains. Nonetheless, impacts of the proposed project to scenic vistas may be significant requiring mitigation consistent with the findings of the 2020 SMP PEIR. This issue will be carried forward for further analysis in the EIR.
- b) **No Impact.** The proposed treatment upgrades at WRP 4 would occur within the existing facility and would not have the potential to cause damage to scenic resources. It is not anticipated that off-site structures including recycled water pipelines and Phase 3 storage tank would require removal and/or relocation of trees. Further, there are no officially designated California State

Scenic Highways in the vicinity of the project (Caltrans 2023). No impact would occur. This issue will not be carried forward for further analysis in the EIR.

- c) **No Impact.** The proposed project area is developed and includes water facilities, farmland, and roadways. The Project proposes upgrades to the existing WRP 4 treatment facility and construction and operation of the off-site distribution pipelines and storage tank, which are compatible with existing zoning designations. No impact would occur. This issue will not be carried forward for further analysis in the EIR.
- d) **No Impact.** The proposed recycled water pipelines would be located underground and would not have the potential to create new sources of light or glare. Proposed infrastructure improvements at WRP 4 involve newly constructed aboveground structures, such as a filter feed pump station, filtration tanks, and a blended water reservoir. However, these structures would be consistent with existing onsite infrastructure. No shiny or highly reflective materials would be used to construct any aboveground facilities onsite or off-site. No impact would occur. This issue will not be carried forward for further analysis in the EIR.

References

Caltrans, 2023. State Scenic Highway Map. Available online at: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>, accessed September 2023.

Coachella Valley Water District, 2022. Sanitation Master Plan Update 2020 Final Program EIR (PEIR) (SCH No. 2019090307).

Agriculture and Forestry Resources

<u>Issues (and Supporting Information Sources):</u>	<u>Potentially Significant Impact</u>	<u>Project Impact Adequately Addressed in SMP PEIR</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
II. AGRICULTURE AND FORESTRY RESOURCES —				
<p>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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))?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 or conversion of forest land to non-forest use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a-e) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant impacts to agricultural resources that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), these impacts will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.

Air Quality

<u>Issues (and Supporting Information Sources):</u>	<u>Potentially Significant Impact</u>	<u>Project Impact Adequately Addressed in SMP PEIR</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
III. AIR QUALITY —				
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a-d) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant air quality impacts that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), these impacts will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.
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Biological Resources

<u>Issues (and Supporting Information Sources):</u>	<i>Potentially Significant Impact</i>	<i>Project Impact Adequately Addressed in SMP PEIR</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
IV. BIOLOGICAL RESOURCES — Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a-f) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant biological resources impacts that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), these impacts will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.

Cultural Resources

<u>Issues (and Supporting Information Sources):</u>	<u>Potentially Significant Impact</u>	<u>Project Impact Adequately Addressed in SMP PEIR</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
V. CULTURAL RESOURCES — Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a-c) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant cultural resources impacts that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), these impacts will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.

Energy

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Project Impact Adequately Addressed in SMP PEIR</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
VI. ENERGY — Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a-b) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant energy impacts that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), these impacts will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.

Geology and Soils

<u>Issues (and Supporting Information Sources):</u>	<u>Potentially Significant Impact</u>	<u>Project Impact Adequately Addressed in SMP PEIR</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
VII. GEOLOGY AND SOILS — Would the project:				
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? Refer to Division of Mines and Geology Special Publication 42.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a-f) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant impacts to geology and geologic hazards that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), these impacts will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.

Greenhouse Gas Emissions

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Project Impact Adequately Addressed in SMP PEIR</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
VIII. GREENHOUSE GAS EMISSIONS —				
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a, b) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant impacts to greenhouse gas emissions that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), these impacts will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.
-

Hazards and Hazardous Materials

<u>Issues (and Supporting Information Sources):</u>	<u>Potentially Significant Impact</u>	<u>Project Impact Adequately Addressed in SMP PEIR</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
IX. HAZARDS AND HAZARDOUS MATERIALS —				
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a-e) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant hazards and hazardous materials impacts that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), these impacts will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.
- f-g) **No Impact.** The proposed project would not have the potential to impair the implementation of emergency response plans, nor would the proposed project expose people or structures directly or indirectly to risks associated with wildland fires.

References

Coachella Valley Water District, 2022. Sanitation Master Plan Update 2020 Final Program EIR (PEIR) (SCH No. 2019090307).

Hydrology and Water Quality

<u>Issues (and Supporting Information Sources):</u>	<u>Potentially Significant Impact</u>	<u>Project Impact Adequately Addressed in SMP PEIR</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
X. HYDROLOGY AND WATER QUALITY — Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a-e) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant hydrology and water quality impacts that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), the potential impacts of the proposed project on hydrology and water quality will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.

Land Use and Planning

<u>Issues (and Supporting Information Sources):</u>	<u>Potentially Significant Impact</u>	<u>Project Impact Adequately Addressed in SMP PEIR</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
XI. LAND USE AND PLANNING — Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

As described in the 2020 SMP PEIR, the SMP includes improvements to existing WRPs and lift stations; rehabilitation of existing sewer pipelines; construction of new sewer pipelines and lift stations; and operation and maintenance improvements. New sewer pipelines would primarily be constructed within existing roadway rights-of-way. There are locations where sewer pipelines would need to traverse open land; however, sewer pipelines would be located underground which would not divide an established community (CVWD 2022). The analysis in this section is supplemented by information specific to the proposed project.

- a) **Project Impact Adequately Addressed in SMP PEIR.** The proposed project would involve treatment facility upgrades at the existing WRP 4 site, construction of recycled water delivery pipelines underground, and one off-site storage tank. Due to the nature of the proposed project, no infrastructure is proposed that would have the potential to physically divide an established community. Consistent with the findings of the 2020 SMP PEIR, no impact would occur. The proposed project impacts related to this issue were adequately addressed in the 2020 SMP PEIR.
- b) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant impacts to land uses that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), the potential impacts of the proposed project on land use and planning will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.

References

Coachella Valley Water District, 2022. Sanitation Master Plan Update 2020 Final Program EIR (PEIR) (SCH No. 2019090307).

Mineral Resources

<u>Issues (and Supporting Information Sources):</u>	<u>Potentially Significant Impact</u>	<u>Project Impact Adequately Addressed in SMP PEIR</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
XII. MINERAL RESOURCES — Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The analysis of mineral resources is tiered from the 2020 SMP PEIR and was addressed in Section 2.4, CEQA Overview, of that document. The 2020 SMP PEIR found that the installation of sanitation infrastructure would not involve areas in the region mined for mineral resources or areas with known classified land containing regionally significant mineral resources, as mandated by the Surface Mining and Reclamation Act of 1975 (SMARA). For these reasons, no further analysis was conducted for mineral resources (CVWD 2022). The analysis in this section is supplemented by information specific to the proposed project.

- a) **No Impact.** According to the Riverside County General Plan Conservation Element (2015), the project area is not located within a Mineral Resource Zone (MRZ) where significant mineral resources would be present. There are no active oil or gas wellfields in the project area (Geology Energy Management Division [CalGEM] 2023). Therefore, no impact would occur. This issue will not be carried forward for further analysis in the EIR.
- b) **No Impact.** The project area is not used for mineral extraction and is not known as a locally important resource recovery site. Further, the project site is not designated for mineral resource recovery uses in the Riverside County General Plan (2015). Therefore, no impact would occur. This issue will not be carried forward for further analysis in the EIR.

References

CalGEM, 2023. Well Finder (WellSTAR) Database. Available online at: <https://www.conservation.ca.gov/calgem/Pages/WellFinder.aspx>, accessed September 2023.

Coachella Valley Water District, 2022. Sanitation Master Plan Update 2020 Final Program EIR (PEIR) (SCH No. 2019090307).

Riverside County, 2015. County of Riverside General Plan. Available online at: <https://planning.rctlma.org/general-plan-and-zoning/riverside-county-general-plan>, accessed September 2023.

Noise

<u>Issues (and Supporting Information Sources):</u>	<u>Potentially Significant Impact</u>	<u>Project Impact Adequately Addressed in SMP PEIR</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
XIII. NOISE — Would the project result in:				
a) 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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, would the project expose people residing or working in the project area to excessive noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a-c) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant noise and vibration impacts that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), the potential noise and vibration impacts of the proposed project will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.

Population and Housing

<u>Issues (and Supporting Information Sources):</u>	<u>Potentially Significant Impact</u>	<u>Project Impact Adequately Addressed in SMP PEIR</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
XIV. POPULATION AND HOUSING — Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The analysis of population and housing is tiered from the 2020 SMP PEIR and was addressed in Section 2.4, CEQA Overview, of that document. The 2020 SMP PEIR states the Master Plan would accommodate the planned growth in the CVWD service area (as described in local city and county General Plans) but would not in itself induce population growth; in addition, the proposed sewer infrastructure improvements are designed to meet sewer capacity demand but would not in themselves create the demand. For these reasons, the evaluation of population and housing was not carried forward for further analysis in the PEIR (CVWD 2022). The analysis in this section is supplemented by information specific to the proposed project.

- a) **No Impact.** The proposed project would not include the construction of new housing or businesses that would have a direct impact on population growth in the area. The purpose of the proposed treatment upgrades at WRP 4 is to accommodate planned growth and associated future water demands, while the proposed distribution system would provide recycled water to existing agricultural customers. The proposed project would utilize the local labor force for construction. Operations and maintenance activities are anticipated to be minimal and would be conducted by existing CVWD staff. As such, there would be no impact related to the direct or indirect inducement of substantial unplanned population growth in the project area. This issue will not be carried forward for further analysis in the EIR.
- b) **No Impact.** The proposed project would not have the potential to displace substantial numbers of people as it would not involve the removal or disturbance of existing housing. No impact would occur. This issue will not be carried forward for further analysis in the EIR.

References

Coachella Valley Water District, 2022. Sanitation Master Plan Update 2020 Final Program EIR (PEIR) (SCH No. 2019090307).

Public Services

<u>Issues (and Supporting Information Sources):</u>	<u>Potentially Significant Impact</u>	<u>Project Impact Adequately Addressed in SMP PEIR</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
XV. PUBLIC SERVICES —				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:				
i) Fire protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

a.i-v) **Project Impact Adequately Addressed in SMP PEIR.** As identified in the 2020 SMP PEIR, the Master Plan would accommodate the planned growth in the CVWD service area and would not result in population growth which would increase the need for additional public services (CVWD 2022). The proposed project would not change existing demand for fire protection, police protection, schools, or parks because no increase in population growth or employment would occur from the proposed treatment facility upgrades or the proposed recycled water distribution system. The proposed project would have no impact on public facilities. Therefore, the impacts of the proposed project were adequately addressed in the 2020 SMP PEIR.

References

Coachella Valley Water District, 2022. Sanitation Master Plan Update 2020 Final Program EIR (PEIR) (SCH No. 2019090307).

Recreation

<u>Issues (and Supporting Information Sources):</u>	<u>Potentially Significant Impact</u>	<u>Project Impact Adequately Addressed in SMP PEIR</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
XVI. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a) **No Impact.** The proposed project would construct tertiary treatment facilities within the existing WRP 4 plant site to accommodate planned population growth and the proposed distribution system would provide NPW to existing customers in CVWD’s service area. The proposed project would not result in direct or indirect growth in population or housing and is not expected to impact existing neighborhood or regional parks or other recreational facilities due to increases in park usage. No impact would occur. This issue will not be carried forward for further analysis in the EIR.
- b) **No Impact.** The Proposed Project would consist of upgrades to existing water infrastructure and would not affect recreational facilities. As such, the Proposed Project would not require the construction of new recreational facilities, which might have an adverse physical effect on the environment. No impact would occur. This issue will not be carried forward for further analysis in the EIR.

Transportation

<u>Issues (and Supporting Information Sources):</u>	<u>Potentially Significant Impact</u>	<u>Project Impact Adequately Addressed in SMP PEIR</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
XVII. TRANSPORTATION — Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a-d) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant transportation and traffic impacts that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), the potential impacts of the proposed project to the existing circulation system will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.

Tribal Cultural Resources

<u>Issues (and Supporting Information Sources):</u>	<u>Potentially Significant Impact</u>	<u>Project Impact Adequately Addressed in SMP PEIR</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
XVIII. TRIBAL CULTURAL RESOURCES —				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) 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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) 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 5024.1. 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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a.i, ii) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant impacts to tribal cultural resources that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), the potential impacts of the proposed project to tribal cultural resources will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.

Utilities and Service Systems

<u>Issues (and Supporting Information Sources):</u>	<u>Potentially Significant Impact</u>	<u>Project Impact Adequately Addressed in SMP PEIR</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
XIX. UTILITIES AND SERVICE SYSTEMS —				
Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a-d) **No Impact.** The proposed project upgrade recycled water treatment and delivery systems and would not result in the construction of new facilities to accommodate the proposed project. The project would not increase water demands, wastewater treatment demands, or solid waste management demands. No impact would occur. This issue will not be carried forward for further analysis in the EIR.
- e) **Project Impact Adequately Addressed in SMP PEIR.** The project would be consistent with all federal state and local management and reduction statues as concluded in the 2020 PEIR. This issue will not be carried forward for further analysis in the EIR.

References

Coachella Valley Water District, 2022. Sanitation Master Plan Update 2020 Final Program EIR (PEIR) (SCH No. 2019090307).

Wildfire

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Project Impact Adequately Addressed in SMP PEIR</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
XX. WILDFIRE — If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a-d) **No Impact.** The 2020 SMP PEIR states that Fire Hazard Severity Zones within the Coachella Valley are generally located along the east-facing slopes of the Santa Rosa-San Jacinto Mountains. The proposed project area is not located in these areas but located within the Coachella Valley Floor. Further, on review of wildfire severity maps prepared by the California Department of Forestry and Fire Protection (CAL FIRE), the proposed project area is not located within or near a state responsibility area and is not classified as a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2023). Therefore, no impact would occur. This issue will not be carried forward for further analysis in the EIR.

References

CAL FIRE, 2023. Fire Hazard Severity Zone Viewer. Available online at: <https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildfire-preparedness/fire-hazard-severity-zones/fire-hazard-severity-zone-maps/>, accessed September 2023.

Mandatory Findings of Significance

<u>Issues (and Supporting Information Sources):</u>	<u>Potentially Significant Impact</u>	<u>Project Impact Adequately Addressed in SMP PEIR</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
XXI. MANDATORY FINDINGS OF SIGNIFICANCE —				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a-c) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant impacts that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), the potential impacts of the proposed project related to the environmental issues described above will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.

Attachment 2: Scoping Meeting Sign-in Sheets

Sign-in Sheet

Coachella Valley Water District
75515 Hovley Lane East
Palm Desert, CA 92211
Wednesday, November 1, 2023 | 6:00pm

Coachella Valley Water District Water Reclamation Plant No. 4 Non-Potable Water Improvements Project

The signing, registering, or completion of this document is voluntary. All persons may attend this meeting regardless of whether they sign, register, or complete this document.

Name: Joan Taylor
Affiliation/Organization: Sunrise Club
Address: palmcanyon@mac.com

Email: _____

Do you want future notices regarding this project? yes no

Name: William Patterson
Affiliation/Organization: CVWD
Address: wpatterson@cvwd.org

Email: _____

Do you want future notices regarding this project? yes no

Name: Loe Rodriguezal Rey
Affiliation/Organization: CVWD
Address: _____

Email: zrodriguezalrey@cvwd.org

Do you want future notices regarding this project? yes no

Name: Carlos Huerta
Affiliation/Organization: CVWD
Address: _____

Email: chuerta@cvwd.org

Do you want future notices regarding this project? yes no

Name: Armando Rodriguez
Affiliation/Organization: CVWD
Address: _____

Email: arodriguez@cvwd.org

Do you want future notices regarding this project? yes no

Name: Krystal Otworth
Affiliation/Organization: Leadership Counsel for Justice & Accountability
Address: _____

Email: krystalotworth@leadershipcounsel.org

Do you want future notices regarding this project? yes no

Name: _____
Affiliation/Organization: _____
Address: _____

Email: _____

Do you want future notices regarding this project? yes no

Name: _____
Affiliation/Organization: _____
Address: _____

Email: _____

Do you want future notices regarding this project? yes no

Attachment 3: Comment Letters Received by CVWD



NATIVE AMERICAN HERITAGE COMMISSION

October 13, 2023

William Patterson
Coachella Valley Water District
75515 Hovley Lane East
Palm Desert, CA 92211

CHAIRPERSON
Reginald Pagaling
Chumash

Re: 2023100315, Water Reclamation Plant No. 4 Non-Potable Water Improvements Project, Riverside County

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

Dear Mr. Patterson:

SECRETARY
Sara Dutschke
Miwok

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

PARLIAMENTARIAN
Wayne Nelson
Luiseño

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides 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. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Laurena Bolden
Serrano

COMMISSIONER
Reid Milanovich
Cahuilla

COMMISSIONER
Vacant

EXECUTIVE SECRETARY
Raymond C. Hitchcock
Miwok, Nisenan

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
- c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
- e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
- f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
- b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

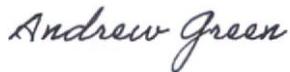
1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse

Andray Cardoza

From: William Patterson <WPatterson@cvwd.org>
Sent: Tuesday, October 24, 2023 9:34 AM
To: Carlos Huerta; Andray Cardoza
Subject: FW: Water Reclamation Plant No. 4 Non-Potable Water Improvements Project-Due 11/13/2023
Attachments: 0638_001.pdf

FYI

From: McKinney, Elsa <EMcKinne@rivco.org>
Sent: Monday, October 23, 2023 2:02 PM
To: William Patterson <WPatterson@cvwd.org>
Cc: McNeill, Amy <ammcneil@RIVCO.ORG>; Cornelius, William <wmcornel@RIVCO.ORG>
Subject: Water Reclamation Plant No. 4 Non-Potable Water Improvements Project-Due 11/13/2023

External e-mail: Do not click on links or open attachments unless you recognize the sender and you know the content is safe. o365

Good afternoon William,

Upon review of the site location, this project will not have any impacts to Riverside County Flood Control and Water Conservation District storm drain facilities. The project is not located with an Area Drainage Plan and therefore no fees are required to be paid. Please note the location of the channel and project limits are shown within the Coachella Valley Water District jurisdiction.

Best Regards,



Elsa McKinney, Engineering Aide
Development Review
[RIVERSIDE COUNTY FLOOD CONTROL
& WATER CONSERVATION DISTRICT](#)
1995 Market Street, Riverside, CA
92501
951.955.2878 | emckinne@rivco.org

*Off Fridays

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NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND NOTICE OF SCOPING MEETING

DATE: October 12, 2023

TO: Responsible Agencies, Trustee Agencies, Interested Parties

LEAD AGENCY: Coachella Valley Water District

PROJECT TITLE: Water Reclamation Plant No. 4 Non-Potable Water Improvements Project

PUBLIC REVIEW PERIOD: October 12, 2023 through November 13, 2023

This Notice of Preparation (NOP) has been prepared to notify agencies and interested parties that Coachella Valley Water District (CVWD), as the lead agency pursuant to the California Environmental Quality Act (CEQA), is preparing an Environmental Impact Report (EIR) for the Water Reclamation Plant No. 4 (WRP 4) Non-Potable Water (NPW) Improvements Project (proposed project). The EIR will tier from CVWD's Sanitation Master Plan Update 2020 Final Program EIR (PEIR) (2020 SMP PEIR) (SCH No. 2019090307), referring to and relying on the analysis of the previous PEIR where appropriate pursuant to CEQA Guidelines Section 15168. CVWD is soliciting comments from responsible and trustee agencies as well as interested parties as to the scope and content of the environmental information to be included in the EIR. In accordance with CEQA, agencies are requested to review the project description provided in this NOP and provide comments on environmental issues related to the statutory responsibilities of the agency. The EIR will be used by CVWD when considering approval of the proposed project as well as any related discretionary approvals.

POTENTIAL ENVIRONMENTAL IMPACTS: The EIR will assess and disclose the reasonably foreseeable direct, indirect, and cumulative impacts that would likely result from the construction and operation of the proposed project. An Initial Study prepared pursuant to CEQA Guidelines Section 15063 is included as **Attachment A**. Based on the analysis included in the Initial Study, the EIR will evaluate the following resources listed in Appendix G of the CEQA Guidelines: Aesthetics, Agriculture, Air Quality, Biological Resources, Cultural Resources, Energy, Hazardous Materials, Hydrology, Geology and Soils, Land Use, Noise, Transportation, Tribal Cultural Resources, and Cumulative Effects. The EIR will identify mitigation measures if necessary to avoid, minimize, and offset potentially significant impacts of the project. The EIR also will evaluate alternatives to the proposed project that would avoid, or substantially lessen potentially significant impacts of the project while attempting to meet the objectives of the proposed project.

Due to the time limits mandated by State law, all comments to the NOP must be received by CVWD no later than 30 days after publication of this notice. The response deadline is **4:00 p.m. on November 13, 2023**. Please send your written comments to the mailing address or email address shown below. Include a return address or email address and a contact name for your agency or party with your comments.



CONTACT:

Coachella Valley Water District
75515 Hovley Lane East
Palm Desert, California 92211
Attn: William Patterson, Environmental Supervisor
WPatterson@cvwd.org
(760) 398-2651

PROJECT LOCATION: WRP 4 is located southeast of Avenue 62 on Filmore Street in Thermal, CA, an unincorporated area of Riverside County. The property is bordered by Avenue 62 on the north, Avenue 64 on the south, Filmore Street on the west, and by the Coachella Valley Stormwater Channel (CVSC) on the east. The site has a stormwater berm running along the north edge of the property near avenue 62 and along the west side, parallel to Filmore Street. Running parallel to Avenue 64 is a stormwater collection channel that carries shallow groundwater, irrigation return flows, and precipitation runoff from properties north of Avenue 64 to the CVSC.

BACKGROUND: CVWD provides services for water, wastewater, recycled water, irrigation/drainage, regional stormwater protection and groundwater management to the Coachella Valley. CVWD currently operates five WRPs (WRP 1, 2, 4, 7 & 10) in Coachella Valley to treat wastewater influent. WRP 4 currently provides secondary treatment to wastewater collected from as far east as Cathedral City and as far north as Thousand Palms. WRP 4 has a design capacity of 9.9 million gallons per day (MGD) and currently treats an average daily flow of approximately 5.7 MGD. The treated effluent is discharged to the CVSC.

Based on CVWD's Sanitation Master Plan, growth in the WRP 4 service area is expected to increase plant influent flows to 20 MGD by 2045. In response to this growth, CVWD has planned several projects to expand WRP treatment capacity to meet future demands and to enable 100 percent of the effluent to be reused, ultimately eliminating the discharge to the CVSC. WRP 4 is not currently producing or delivering recycled water. The proposed project would enable CVWD to provide recycled water, compliant with California Code of Regulations Title 22 to agricultural customers in the eastern portion of Coachella Valley in the vicinity of the WRP 4 treatment facility.

Currently, WRP 4 effluent is discharged to the CVSC pursuant to Order R7-2017-006 and NPDES Permit No. CA104973. CVWD submitted a Wastewater Change Petition (WW0093) to the State Water Resources Control Board (State Water Board) in 2016 to divert flows to agricultural irrigation, reducing the demand on local groundwater. This EIR will evaluate environmental impacts of the waste discharge change petition, including but not limited to an analysis of reduced discharge to receiving waters and increased recycled water use.

PROJECT DESCRIPTION: The proposed project would construct tertiary treatment facilities within the existing WRP 4 plant site to enable production of up to 10 MGD of non-potable recycled water for irrigation. CVWD has developed three phases to achieve 10 MGD production and distribution:

- Phase 1 would include construction and operation of a 1-MGD packaged cloth disk filtration system and an ultraviolet (UV) disinfection treatment plant as part of an overall treatment facility incorporating infrastructure expandable to 2.5 MGD. CVWD would construct a new reservoir

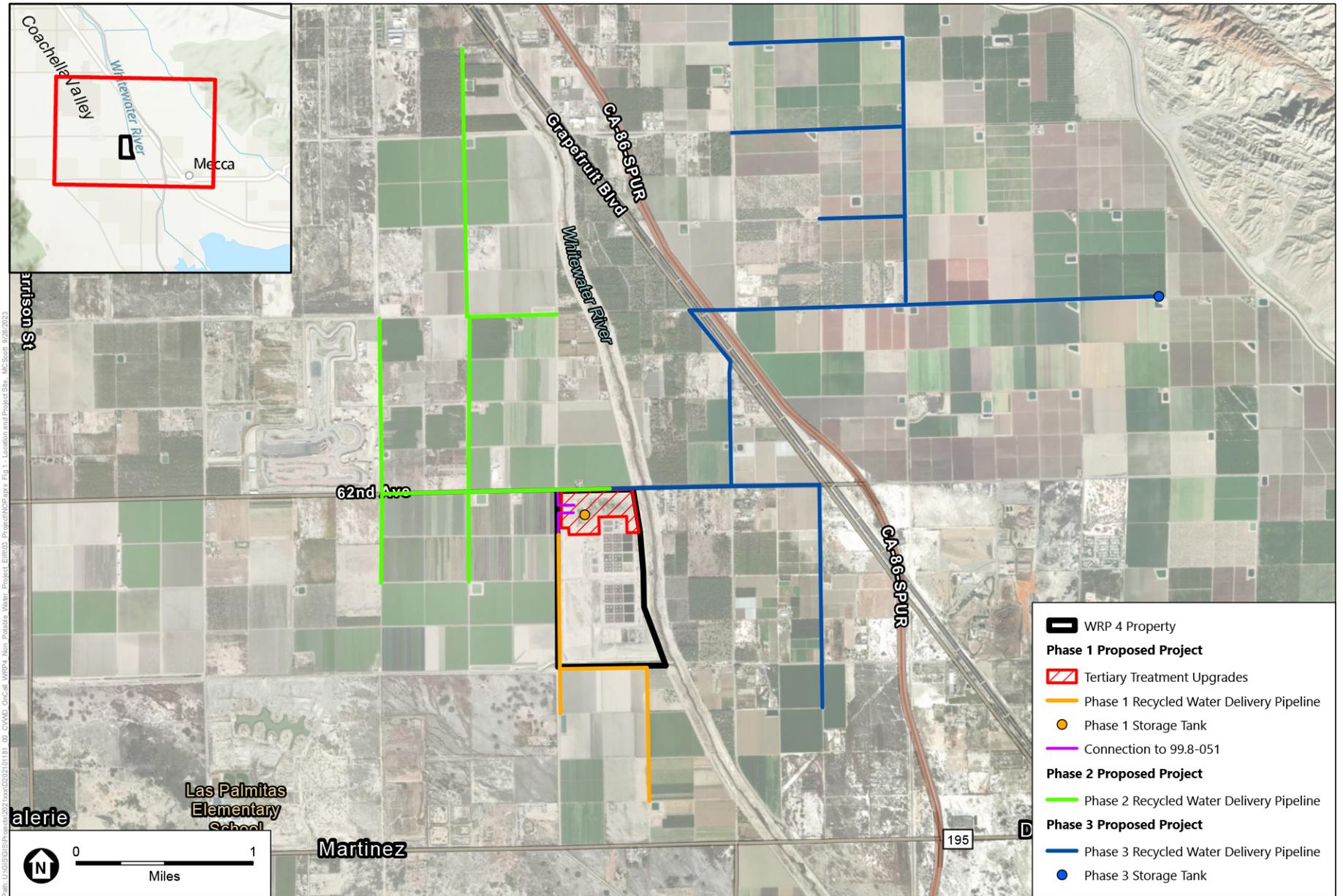
serving as a regulatory structure within WRP 4 and repurpose an existing irrigation pipeline to deliver a blend of recycled water and canal water to customers located south of WRP 4.

- Phase 2 would incorporate additional equipment at WRP 4 to treat up to 2.5 MGD of tertiary treated recycled water, with onsite infrastructure expandable to 10 MGD, and construction of new distribution pipelines to deliver 2.5 MGD of recycled water.
- Phase 3 would increase treatment capacity at WRP 4 to up to 10 MGD. Similar to Phase 2, new recycled water delivery pipelines would be constructed to accommodate delivery of 10 MGD to agricultural customers.

Figure 1 shows the project location and the Phase 1, 2, and 3 project sites.

Construction of Phase 1 of the proposed project would begin in July 2025 and be completed at the end of 2027. Near the end of construction, testing and startup activities would commence with the system distributing recycled water to customers in 2028.

SCOPING MEETING: An open-house style public scoping meeting is scheduled for **6:00 p.m. on Wednesday, November 1st** to receive comments and suggestions about issues to be included in the EIR. The meeting will be held at CVWD's Steve Robbins Administrative Building located at 75515 Hovley Lane East in Palm Desert. The public scoping meeting will include a brief presentation providing an overview of the proposed project. After the presentation, public comments will be accepted.



SOURCE: ESA, 2022

CVWD WRP No. 4 Project

Figure 1
Project Location and Proposed Project Site

ATTACHMENT A

Initial Study

Introduction

Pursuant to Section 15063 of the California Environmental Quality Act (CEQA) Guidelines (Title 14, California Code of Regulations, Sections 15000 et seq.), an Initial Study is a preliminary environmental analysis that is used by the lead agency as a basis for determining whether an EIR, a Mitigated Negative Declaration, or a Negative Declaration is required for a project. This Initial Study has been prepared to determine whether the proposed Water Reclamation Plant No. 4 (WRP 4) Non-Potable Water (NPW) Improvements Project (proposed project) may cause significant effects on the environment that were not adequately addressed in the Coachella Valley Water District (CVWD) Sanitation Master Plan Update 2020 Final Program EIR (PEIR) (2020 SMP PEIR) (SCH No. 2019090307). The analysis in this Initial Study determined that an EIR would be the appropriate CEQA document.

Environmental Setting

CVWD's service area covers approximately 1,000 square miles from the San Geronio Pass to the Salton Sea, mostly within the Coachella Valley in Riverside County, California. CVWD's service boundary also extends into small portions of Imperial and San Diego counties. The proposed project is located in the Coachella Valley in southern California, within CVWD's service area, located approximately 130 miles east of the City of Los Angeles and 140 miles northeast of the City of San Diego. The topography of the service area is valley-centered, with a mild slope generally following the Coachella Valley Stormwater Channel, which bisects the Coachella Valley as it flows from the west to the east/southeast, discharging to the Salton Sea. The Salton Sea generally forms the southern boundary of the CVWD service area, with the Chocolate Mountains on the east and the Santa Rosa Mountains on the west. The southern tip of the San Bernardino Mountains forms the northern extent of the service area.

WRP 4 is located southeast of Avenue 62 on Filmore Street in Thermal, CA, an unincorporated area of Riverside County. The property is bordered by Avenue 62 on the north, Avenue 64 on the south, Filmore Street on the west, and by the Coachella Valley Stormwater Channel (CVSC) on the east. The site has a stormwater berm running along the north edge of the property near avenue 62 and along the west side, parallel to Filmore Street. Running parallel to Avenue 64 is a stormwater collection channel that carries irrigation and precipitation runoff from properties north of Avenue 64 to the CVSC.

CEQA Tiering Process

Section 15168(d) of the State CEQA Guidelines provides for simplifying the preparation of environmental documents on individual parts of the program by incorporating by reference analyses and discussions that apply to the program as a whole. Where an EIR has been prepared or certified for a program or plan, the environmental review for a later activity consistent with the program or plan should be limited to effects that were not analyzed as significant in the prior EIR or that are susceptible to substantial reduction or avoidance (CEQA Guidelines Section 15152[d]). The State CEQA Guidelines

further provide that where a later activity would have effects that were not examined in the program EIR as provided in Section 15152, a new Initial Study would need to be prepared leading to either an EIR or Negative Declaration (CEQA Guidelines Sections 15168[c]).

The environmental analysis in this Initial Study is tiered from the 2020 SMP PEIR in accordance with Sections 15152 and 15168 of the State CEQA Guidelines. The 2020 SMP PEIR was prepared pursuant to Section 15168 of the State CEQA Guidelines. The 2020 SMP PEIR provides a long-term, comprehensive capital improvement program (CIP) consisting of recommendations to refurbish or replace existing assets, optimize operations, and satisfy projected capacity needs of all sanitation facilities (collection system including gravity pipelines, force mains, lift stations, and the five water reclamation plants [WRPs]) to be implemented between 2020 to 2040 in CVWD's service area. This document incorporates by reference the discussions in the 2020 SMP PEIR and concentrates on proposed project-specific issues.

Environmental Factors Potentially Affected

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

- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> Aesthetics | <input checked="" type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Energy |
| <input checked="" type="checkbox"/> Geology/Soils | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards & Hazardous Materials |
| <input checked="" type="checkbox"/> Hydrology/Water Quality | <input checked="" type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input checked="" type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial study:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Prepared by: Andray Cardoza 10/5/23
 Andray Cardoza Date
 Task Lead/Environmental Planner
 Environmental Science Associates

Reviewed by: William Patterson 10/5/23
 William Patterson Date
 Environmental Supervisor
 Coachella Valley Water District

Environmental Checklist

Aesthetics

<u>Issues (and Supporting Information Sources):</u>	<u>Potentially Significant Impact</u>	<u>Project Impact Adequately Addressed in SMP PEIR</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
I. AESTHETICS — Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The analysis of aesthetics is tiered from the 2020 SMP PEIR and was addressed in Section 2.4, CEQA Overview, of that document. The 2020 SMP PEIR found impacts to aesthetics for all Master Plan projects not to be significant because proposed improvements to existing sanitation facilities would not significantly affect scenic resources, as they are already a part of the existing landscape. The proposed pipelines would be located underground and predominantly within the right-of-way (ROW) of existing roadways and would not be visible. Aesthetic impacts were found not to be significant and not discussed further in the PEIR (CVWD 2022). The analysis in this section is supplemented by information specific to the proposed project.

- a) **Potentially Significant Impact.** Views in the project area consist mainly of residential and agricultural land uses, public facilities, open space and distant mountains vistas. As discussed in Section 2.4 of the 2020 SMP PEIR, proposed improvements to existing sanitation facilities would not significantly affect scenic resources as they are already part of the existing landscape. The proposed recycled water pipelines would be located underground and would not be visible following construction. One off-site storage tank would be constructed at the high point of the Phase 3 distribution system to the east of WRP 4. The tank would be located an agricultural area sparsely used by the public and would be constructed at a height that would not obstruct or affect scenic views of mountains. Nonetheless, impacts of the proposed project to scenic vistas may be significant requiring mitigation consistent with the findings of the 2020 SMP PEIR. This issue will be carried forward for further analysis in the EIR.
- b) **No Impact.** The proposed treatment upgrades at WRP 4 would occur within the existing facility and would not have the potential to cause damage to scenic resources. It is not anticipated that off-site structures including recycled water pipelines and Phase 3 storage tank would require removal and/or relocation of trees. Further, there are no officially designated California State

Scenic Highways in the vicinity of the project (Caltrans 2023). No impact would occur. This issue will not be carried forward for further analysis in the EIR.

- c) **No Impact.** The proposed project area is developed and includes water facilities, farmland, and roadways. The Project proposes upgrades to the existing WRP 4 treatment facility and construction and operation of the off-site distribution pipelines and storage tank, which are compatible with existing zoning designations. No impact would occur. This issue will not be carried forward for further analysis in the EIR.

- d) **No Impact.** The proposed recycled water pipelines would be located underground and would not have the potential to create new sources of light or glare. Proposed infrastructure improvements at WRP 4 involve newly constructed aboveground structures, such as a filter feed pump station, filtration tanks, and a blended water reservoir. However, these structures would be consistent with existing onsite infrastructure. No shiny or highly reflective materials would be used to construct any aboveground facilities onsite or off-site. No impact would occur. This issue will not be carried forward for further analysis in the EIR.

References

Caltrans, 2023. State Scenic Highway Map. Available online at: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>, accessed September 2023.

Coachella Valley Water District, 2022. Sanitation Master Plan Update 2020 Final Program EIR (PEIR) (SCH No. 2019090307).

Agriculture and Forestry Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Project Impact Adequately Addressed in SMP PEIR</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
II. AGRICULTURE AND FORESTRY RESOURCES —				
<p>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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))?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 or conversion of forest land to non-forest use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a-e) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant impacts to agricultural resources that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), these impacts will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.

Air Quality

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Project Impact Adequately Addressed in SMP PEIR</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
III. AIR QUALITY —				
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a-d) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant air quality impacts that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), these impacts will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.

Biological Resources

<u>Issues (and Supporting Information Sources):</u>	<i>Potentially Significant Impact</i>	<i>Project Impact Adequately Addressed in SMP PEIR</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
IV. BIOLOGICAL RESOURCES — Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a-f) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant biological resources impacts that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), these impacts will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.

Cultural Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Project Impact Adequately Addressed in SMP PEIR</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
V. CULTURAL RESOURCES — Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a-c) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant cultural resources impacts that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), these impacts will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.

Energy

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Project Impact Adequately Addressed in SMP PEIR</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
VI. ENERGY — Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a-b) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant energy impacts that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), these impacts will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.

Geology and Soils

<u>Issues (and Supporting Information Sources):</u>	<u>Potentially Significant Impact</u>	<u>Project Impact Adequately Addressed in SMP PEIR</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
VII. GEOLOGY AND SOILS — Would the project:				
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? Refer to Division of Mines and Geology Special Publication 42.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a-f) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant impacts to geology and geologic hazards that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), these impacts will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.

Greenhouse Gas Emissions

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Project Impact Adequately Addressed in SMP PEIR</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
VIII. GREENHOUSE GAS EMISSIONS —				
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a, b) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant impacts to greenhouse gas emissions that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), these impacts will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.
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Hazards and Hazardous Materials

<u>Issues (and Supporting Information Sources):</u>	<u>Potentially Significant Impact</u>	<u>Project Impact Adequately Addressed in SMP PEIR</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
IX. HAZARDS AND HAZARDOUS MATERIALS —				
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a-e) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant hazards and hazardous materials impacts that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), these impacts will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.
- f-g) **No Impact.** The proposed project would not have the potential to impair the implementation of emergency response plans, nor would the proposed project expose people or structures directly or indirectly to risks associated with wildland fires.

References

Coachella Valley Water District, 2022. Sanitation Master Plan Update 2020 Final Program EIR (PEIR) (SCH No. 2019090307).

Hydrology and Water Quality

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Project Impact Adequately Addressed in SMP PEIR</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
X. HYDROLOGY AND WATER QUALITY — Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a-e) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant hydrology and water quality impacts that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), the potential impacts of the proposed project on hydrology and water quality will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.

Land Use and Planning

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Project Impact Adequately Addressed in SMP PEIR</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
XI. LAND USE AND PLANNING — Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

As described in the 2020 SMP PEIR, the SMP includes improvements to existing WRPs and lift stations; rehabilitation of existing sewer pipelines; construction of new sewer pipelines and lift stations; and operation and maintenance improvements. New sewer pipelines would primarily be constructed within existing roadway rights-of-way. There are locations where sewer pipelines would need to traverse open land; however, sewer pipelines would be located underground which would not divide an established community (CVWD 2022). The analysis in this section is supplemented by information specific to the proposed project.

- a) **Project Impact Adequately Addressed in SMP PEIR.** The proposed project would involve treatment facility upgrades at the existing WRP 4 site, construction of recycled water delivery pipelines underground, and one off-site storage tank. Due to the nature of the proposed project, no infrastructure is proposed that would have the potential to physically divide an established community. Consistent with the findings of the 2020 SMP PEIR, no impact would occur. The proposed project impacts related to this issue were adequately addressed in the 2020 SMP PEIR.
- b) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant impacts to land uses that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), the potential impacts of the proposed project on land use and planning will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.

References

Coachella Valley Water District, 2022. Sanitation Master Plan Update 2020 Final Program EIR (PEIR) (SCH No. 2019090307).

Mineral Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Project Impact Adequately Addressed in SMP PEIR</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
XII. MINERAL RESOURCES — Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The analysis of mineral resources is tiered from the 2020 SMP PEIR and was addressed in Section 2.4, CEQA Overview, of that document. The 2020 SMP PEIR found that the installation of sanitation infrastructure would not involve areas in the region mined for mineral resources or areas with known classified land containing regionally significant mineral resources, as mandated by the Surface Mining and Reclamation Act of 1975 (SMARA). For these reasons, no further analysis was conducted for mineral resources (CVWD 2022). The analysis in this section is supplemented by information specific to the proposed project.

- a) **No Impact.** According to the Riverside County General Plan Conservation Element (2015), the project area is not located within a Mineral Resource Zone (MRZ) where significant mineral resources would be present. There are no active oil or gas wellfields in the project area (Geology Energy Management Division [CalGEM] 2023). Therefore, no impact would occur. This issue will not be carried forward for further analysis in the EIR.
- b) **No Impact.** The project area is not used for mineral extraction and is not known as a locally important resource recovery site. Further, the project site is not designated for mineral resource recovery uses in the Riverside County General Plan (2015). Therefore, no impact would occur. This issue will not be carried forward for further analysis in the EIR.

References

- CalGEM, 2023. Well Finder (WellSTAR) Database. Available online at: <https://www.conservation.ca.gov/calgem/Pages/WellFinder.aspx>, accessed September 2023.
- Coachella Valley Water District, 2022. Sanitation Master Plan Update 2020 Final Program EIR (PEIR) (SCH No. 2019090307).
- Riverside County, 2015. County of Riverside General Plan. Available online at: <https://planning.rctlma.org/general-plan-and-zoning/riverside-county-general-plan>, accessed September 2023.

Noise

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Project Impact Adequately Addressed in SMP PEIR</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
XIII. NOISE — Would the project result in:				
a) 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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, would the project expose people residing or working in the project area to excessive noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a-c) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant noise and vibration impacts that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), the potential noise and vibration impacts of the proposed project will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.

Population and Housing

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Project Impact Adequately Addressed in SMP PEIR</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
XIV. POPULATION AND HOUSING — Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The analysis of population and housing is tiered from the 2020 SMP PEIR and was addressed in Section 2.4, CEQA Overview, of that document. The 2020 SMP PEIR states the Master Plan would accommodate the planned growth in the CVWD service area (as described in local city and county General Plans) but would not in itself induce population growth; in addition, the proposed sewer infrastructure improvements are designed to meet sewer capacity demand but would not in themselves create the demand. For these reasons, the evaluation of population and housing was not carried forward for further analysis in the PEIR (CVWD 2022). The analysis in this section is supplemented by information specific to the proposed project.

- a) **No Impact.** The proposed project would not include the construction of new housing or businesses that would have a direct impact on population growth in the area. The purpose of the proposed treatment upgrades at WRP 4 is to accommodate planned growth and associated future water demands, while the proposed distribution system would provide recycled water to existing agricultural customers. The proposed project would utilize the local labor force for construction. Operations and maintenance activities are anticipated to be minimal and would be conducted by existing CVWD staff. As such, there would be no impact related to the direct or indirect inducement of substantial unplanned population growth in the project area. This issue will not be carried forward for further analysis in the EIR.
- b) **No Impact.** The proposed project would not have the potential to displace substantial numbers of people as it would not involve the removal or disturbance of existing housing. No impact would occur. This issue will not be carried forward for further analysis in the EIR.

References

Coachella Valley Water District, 2022. Sanitation Master Plan Update 2020 Final Program EIR (PEIR) (SCH No. 2019090307).

Public Services

<u>Issues (and Supporting Information Sources):</u>	<u>Potentially Significant Impact</u>	<u>Project Impact Adequately Addressed in SMP PEIR</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
XV. PUBLIC SERVICES —				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:				
i) Fire protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a.i-v) **Project Impact Adequately Addressed in SMP PEIR.** As identified in the 2020 SMP PEIR, the Master Plan would accommodate the planned growth in the CVWD service area and would not result in population growth which would increase the need for additional public services (CVWD 2022). The proposed project would not change existing demand for fire protection, police protection, schools, or parks because no increase in population growth or employment would occur from the proposed treatment facility upgrades or the proposed recycled water distribution system. The proposed project would have no impact on public facilities. Therefore, the impacts of the proposed project were adequately addressed in the 2020 SMP PEIR.

References

Coachella Valley Water District, 2022. Sanitation Master Plan Update 2020 Final Program EIR (PEIR) (SCH No. 2019090307).

Recreation

<u>Issues (and Supporting Information Sources):</u>	<i>Potentially Significant Impact</i>	<i>Project Impact Adequately Addressed in SMP PEIR</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
XVI. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a) **No Impact.** The proposed project would construct tertiary treatment facilities within the existing WRP 4 plant site to accommodate planned population growth and the proposed distribution system would provide NPW to existing customers in CVWD’s service area. The proposed project would not result in direct or indirect growth in population or housing and is not expected to impact existing neighborhood or regional parks or other recreational facilities due to increases in park usage. No impact would occur. This issue will not be carried forward for further analysis in the EIR.
- b) **No Impact.** The Proposed Project would consist of upgrades to existing water infrastructure and would not affect recreational facilities. As such, the Proposed Project would not require the construction of new recreational facilities, which might have an adverse physical effect on the environment. No impact would occur. This issue will not be carried forward for further analysis in the EIR.

Transportation

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Project Impact Adequately Addressed in SMP PEIR</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
XVII. TRANSPORTATION — Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a-d) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant transportation and traffic impacts that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), the potential impacts of the proposed project to the existing circulation system will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.

Tribal Cultural Resources

<u>Issues (and Supporting Information Sources):</u>	<u>Potentially Significant Impact</u>	<u>Project Impact Adequately Addressed in SMP PEIR</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
XVIII. TRIBAL CULTURAL RESOURCES —				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) 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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) 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 5024.1. 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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

a.i, ii) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant impacts to tribal cultural resources that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), the potential impacts of the proposed project to tribal cultural resources will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.

Utilities and Service Systems

<u>Issues (and Supporting Information Sources):</u>	<u>Potentially Significant Impact</u>	<u>Project Impact Adequately Addressed in SMP PEIR</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
XIX. UTILITIES AND SERVICE SYSTEMS —				
Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a-d) **No Impact.** The proposed project upgrade recycled water treatment and delivery systems and would not result in the construction of new facilities to accommodate the proposed project. The project would not increase water demands, wastewater treatment demands, or solid waste management demands. No impact would occur. This issue will not be carried forward for further analysis in the EIR.
- e) **Project Impact Adequately Addressed in SMP PEIR.** The project would be consistent with all federal state and local management and reduction statues as concluded in the 2020 PEIR. This issue will not be carried forward for further analysis in the EIR.

References

Coachella Valley Water District, 2022. Sanitation Master Plan Update 2020 Final Program EIR (PEIR) (SCH No. 2019090307).

Wildfire

<u>Issues (and Supporting Information Sources):</u>	<u>Potentially Significant Impact</u>	<u>Project Impact Adequately Addressed in SMP PEIR</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
XX. WILDFIRE — If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a-d) **No Impact.** The 2020 SMP PEIR states that Fire Hazard Severity Zones within the Coachella Valley are generally located along the east-facing slopes of the Santa Rosa-San Jacinto Mountains. The proposed project area is not located in these areas but located within the Coachella Valley Floor. Further, on review of wildfire severity maps prepared by the California Department of Forestry and Fire Protection (CAL FIRE), the proposed project area is not located within or near a state responsibility area and is not classified as a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2023). Therefore, no impact would occur. This issue will not be carried forward for further analysis in the EIR.

References

CAL FIRE, 2023. Fire Hazard Severity Zone Viewer. Available online at: <https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildfire-preparedness/fire-hazard-severity-zones/fire-hazard-severity-zone-maps/>, accessed September 2023.

Mandatory Findings of Significance

<u>Issues (and Supporting Information Sources):</u>	<i>Potentially Significant Impact</i>	<i>Project Impact Adequately Addressed in SMP PEIR</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
XXI. MANDATORY FINDINGS OF SIGNIFICANCE —				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a-c) **Potentially Significant Impact.** Construction and operation of the proposed project would have the potential to result in significant impacts that were not examined in the 2020 SMP PEIR. In accordance with State CEQA Guidelines Section 15168(f), the potential impacts of the proposed project related to the environmental issues described above will be evaluated in an EIR. The analysis may reference general discussions in the 2020 SMP PEIR where applicable.

Sarah Spano

From: William Patterson <WPatterson@cvwd.org>
Sent: Tuesday, October 31, 2023 10:25 AM
To: Tom Barnes; Sarah Spano
Cc: Carlos Huerta; Joseph Ozimek; Armando Rodriguez
Subject: FW: Any air quality permits required to be issued by South Coast AQMD.

FYI- The SCAQMD staff below contacted me and would like to be notified as a responsible agency during the draft EIR, if the project includes regulated stationary emitting equipment requiring a permit , or a permit amendment (Diesel generator, odor control system, etc.). Thank you.

William

From: Sahar Ghadimi <sghadimi@aqmd.gov>
Sent: Tuesday, October 31, 2023 9:34 AM
To: William Patterson <WPatterson@cvwd.org>
Cc: Sam Wang <swang1@aqmd.gov>
Subject: FW: Any air quality permits required to be issued by South Coast AQMD.

External e-mail: Do not click on links or open attachments unless you recognize the sender and you know the content is safe. o365

Dear Mr. William Patterson,
I hope this message finds you well.

Just wanted to kindly follow up with my previous email. I also attempted to contact you via phone, but unfortunately, we were unable to connect.

Sincerely,

From: Sahar Ghadimi
Sent: Tuesday, October 24, 2023 12:23 PM
To: WPatterson@cvwd.org
Cc: Sam Wang <swang1@aqmd.gov>
Subject: Any air quality permits required to be issued by South Coast AQMD.

Dear William Patterson,
I hope this email finds you well.

I'm Sahar Ghadimi, an Air Quality Specialist at South Coast AQMD.

I'm reviewing the **Notice of Preparation for the Water Reclamation Plant No. 4 Non-Potable Water Improvements Project**. An emergency diesel engine or any other stationary source might be involved in this project's context. Are there going to be any air quality permits that need to be acquired from South Coast AQMD, or do any existing permits need to be modified?

Sincerely,

Sahar Ghadimi

Air Quality Specialist, CEQA IGR
Planning, Rule Development & Implementation
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
(909) 396-2392
sghadimi@aqmd.gov



03-011-2023-003

October 31, 2023

[VIA EMAIL TO:WPatterson@cvwd.org]
Coachella Valley Water District
Mr. William Patterson
75-515 E. Hovley Lane East
Palm Desert, CA 92211

Re: Water Reclamation No. 4 Non-Potable Water Improvements

Dear Mr. William Patterson,

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to include the Tribal Historic Preservation Office (THPO) in the Water Reclamation Plant No. 4 Non-Potable Water Improvements project. The project area is not located within the boundaries of the ACBCI Reservation. However, it is within the Tribe's Traditional Use Area. A records check of the ACBCI registry indicates this area has not been surveyed for cultural resources. In consultation, the ACBCI THPO requests the following:

*Copies of any cultural resource documentation (report and site records) generated in connection with this project.

*A cultural resources inventory of the project area by a qualified archaeologist prior to any development activities in this area.

*A copy of the records search with associated survey reports and site records from the information center.

*The presence of an archaeologist that meets the Secretary of Interior's standards during any ground disturbing activities.

*The presence of an approved Cultural Resource Monitor(s) during any ground disturbing activities (including archaeological testing and surveys). Should buried cultural deposits be encountered, the Monitor may request that destructive construction halt and the Monitor shall notify a Qualified Archaeologist (Secretary of the Interior's Standards and Guidelines) to investigate and, if necessary, prepare a mitigation plan for submission to the State Historic Preservation Officer.

*Formal government to government consultation under California Assembly Bill No. 52 (AB-52).

* Please send EIR to ACBCI THPO Consulting.

AGUA CALIENTE BAND OF CAHUILLA INDIANS

TRIBAL HISTORIC PRESERVATION



Again, the Agua Caliente appreciates your interest in our cultural heritage. If you have questions or require additional information, please call me at (760) 883-1134. You may also email me at ACBCI-THPO@aguacaliente.net.

Cordially,

A handwritten signature in blue ink that reads "Claritsa Duarte". The signature is written in a cursive, flowing style.

Claritsa Duarte
Cultural Resources Analyst
Tribal Historic Preservation Office
AGUA CALIENTE BAND
OF CAHUILLA INDIANS



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

November 07, 2023

WPatterson@cvwd.org

William Patterson, Environmental Supervisor
Coachella Valley Water District
75515 Hovley Lane East
Palm Desert, CA 92211

Notice of Preparation of an Environmental Impact Report for the Water Reclamation Plant No. 4 Non-Potable Water Improvements Project (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send a copy of the EIR upon its completion and public release directly to South Coast AQMD as copies of the EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

Responsible Agency and South Coast AQMD

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <http://www.aqmd.gov/home/permits>.

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website¹ as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod² land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds³ and localized significance thresholds (LSTs)⁴ to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

Information on the Community Emissions Reduction Plan (CERP) for the Designated Assembly Bill 617 (AB 617) Eastern Coachella Valley (ECV) Community

The Proposed Project area includes the Assembly Bill 617 (AB 617) designated Eastern Coachella Valley (ECV) community and is heavily impacted by air pollution generated from sources such as the Salton Sea, pesticides, fugitive road dust, open burning and illegal dumping, diesel mobile sources, Greenleaf Desert View Power Plant, and land use issues. As part of the AB 617 process, South Coast AQMD is required to work with a Community Steering Committee (CSC) to develop a Community Emissions Reduction Plan (CERP) that identifies air quality priorities and related actions to address those air quality priorities and reduce air pollution in the community. The South Coast AQMD Governing Board adopted the ECV CERP on June 4,

¹ South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

² CalEEMod is available free of charge at: www.caleemod.com.

³ South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

⁴ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

2021.⁵ South Coast AQMD staff recommends that the Lead Agency review the actions to reduce air pollution in the ECV community included in Chapter 5 of the ECV CERP. South Coast AQMD staff also recommends the Lead Agency continue working with South Coast AQMD to explore whether additional measures to mitigate or further reduce emissions can be implemented at the Proposed Project to support actions in the ECV CERP.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook,⁶ South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2022 Air Quality Management Plan,⁷ and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.⁸

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact Sahar Ghadimi, Air Quality Specialist, at sghadimi@aqmd.gov.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW:SG

RVC231018-05

Control Number

⁵ <https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/eastern-coachella-valley/final-cerp/final-cerp-july-2021.pdf?sfvrsn=9#page=101>.

⁶ <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

⁷ South Coast AQMD's 2022 Air Quality Management Plan can be found at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan> (Chapter 4 - Control Strategy and Implementation).

⁸ Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocial.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.



State Water Resources Control Board

November 8, 2023

In Reply Refer to:
SH: WW0093

William Patterson
Environmental Supervisor
Coachella Valley Water District
WPatterson@cvwd.org

Dear William Patterson:

NOTICE OF PREPARATION FOR THE WATER RECLAMATION PLANT NO. 4 NON-POTABLE WATER IMPROVEMENT PROJECT (SCH # 2023100315) IN RIVERSIDE COUNTY

State Water Resources Control Board (State Water Board), Division of Water Rights (Division) staff has reviewed the Notice of Preparation (NOP) for the Water Reclamation Plant No. 4 Non-Potable Water Improvement Project (project). The Coachella Valley Water District (District) filed a wastewater change petition on August 16, 2016 with the State Water Resources Control Board pursuant to Water Code section 1211. The petition seeks authorization to cease the discharge of treated wastewater from the District's Water Reclamation Plant No. 4 to the Coachella Valley Stormwater Channel tributary to the Salton Sea, during all months of the year.

The State Water Board will act as a Responsible Agency for this project. Accordingly, the State Water Board may need to rely on the Lead Agency's California Environmental Quality Act (CEQA) document to support the Division's environmental evaluation of the requested approval. The Lead Agency should therefore ensure that any CEQA document prepared for the project considers all pertinent information regarding the wastewater change petition and any potential environmental impacts due to reduced flow in the Coachella Valley Stormwater Channel and the Salton Sea.

Thank you for the opportunity to comment on the Notice of Preparation. Stephanie Holstege, Senior Environmental Scientist, Specialist is the lead staff assigned to WW0093, available at (916) 327-8552 or by email at stephanie.holstege@waterboards.ca.gov. Written correspondence or inquiries should be addressed as follows: State Water Resources Control Board, Division of Water Rights, Attn: Stephanie Holstege, P.O. BOX 2000, Sacramento, CA 95812-2000.

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

Sincerely,

Stephanie Holstege

Stephanie Holstege, Senior Environmental Scientist, Specialist
Permitting Section
Division of Water Rights

Ec: Office of Planning and Research
State Clearinghouse, Sacramento
(SCH # 2023100315)
state.clearinghouse@opr.ca.gov



November 13, 2023

William Patterson
Environmental Supervisor
Coachella Valley Water District
75515 Hovley Lane East
Palm Desert, CA 92211

Via email: wpatterson@cvwd.org

RE: Scoping comments on Water Reclamation Plant No. 4 Non-Potable Water Improvement Project

Dear Mr. Patterson:

On behalf of Alianza Coachella Valley, Audubon California, Leadership Counsel for Justice & Accountability, Pacific Institute, and the Sierra Club, we submit these comments in response to the Coachella Valley Water District's (CVWD's) October 12, 2023, Notice of Preparation (NOP) of an Environmental Impact Report (EIR) and notice of scoping meeting on the proposed Water Reclamation Plant No. 4 Non-Potable Water Improvement Project (WRP4 Project). We offer comments on the reasonably foreseeable direct, indirect, and cumulative impacts that should be analyzed in the draft EIR, particularly biological resources, hydrology/water quality, greenhouse gas emissions, land use/planning, and air quality and recommend an additional action alternative to meet the purpose and need at lower cost to CVWD ratepayers. We also offer comments on opportunities for CVWD to improve its public outreach and communications regarding the proposed project.

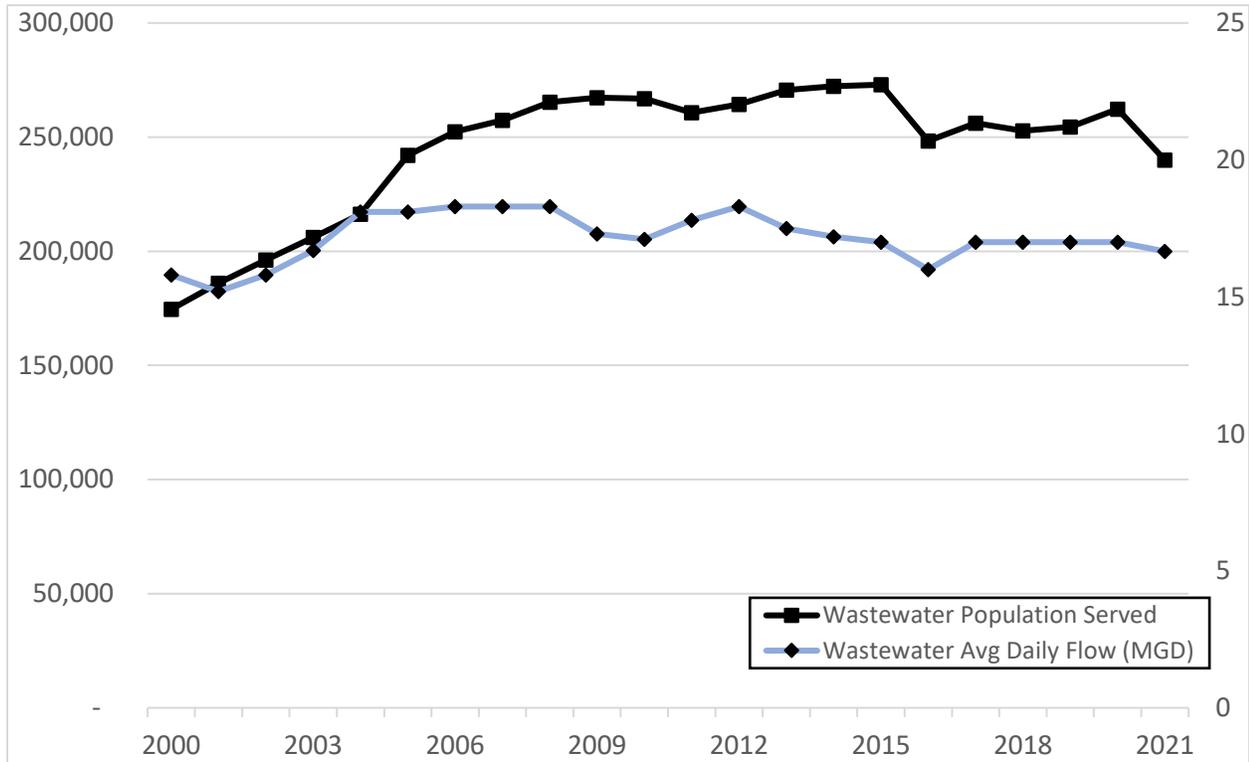
WRP4 is located about 3.5 miles south of Thermal and about 3.5 miles northwest of Mecca, on Fillmore Street near Avenue 62. Per the NOP, "WRP 4 currently provides secondary treatment to wastewater collected from as far east as Cathedral City and as far north as Thousand Palms. WRP 4 has a design capacity of 9.9 million gallons per day (MGD) and currently treats an average daily flow of approximately 5.7 MGD," discharging the treated effluent to the Whitewater River. CVWD's [WRP4 project webpage](#) states that the cost for Phase I of the project is \$39 million. Per the NOP, "the proposed project would construct tertiary treatment facilities within the existing WRP 4 plant site to enable production of up to 10 MGD of non-potable recycled water for irrigation," decreasing discharge to the Whitewater River and the Salton Sea by the same amount.

The NOP does not explicitly state a purpose and need for the proposed project. The Background section of the NOP states, "CVWD has planned several projects to expand WRP treatment capacity to meet future demands and to enable 100 percent of the effluent to be reused, ultimately eliminating the discharge to the CVSC." As we noted in our comments on the CVWD Sanitation Master Plan (SMP), inflated and unsubstantiated population projections can lead to over-construction and excess capacity, wasting the ratepayers' money and creating unnecessary and avoidable impacts. We encourage CVWD, in the draft EIR, to explicitly state a purpose and

need for the proposed project and to clarify the size of its service area population. The SMP noted that “The service area population rose modestly from the prior study period [211,400 in 2005], estimated to be approximately 216,000 in 2015” (p.3-1).

The chart below shows that the population served by CVWD’s sanitation system has been relatively flat since 2008 and that the total volume of wastewater flows has been flat or declining since 2004. If future wastewater treatment demands do not increase as rapidly as projected, CVWD may not need to build the project for decades. Additionally, as described below, investing a portion of the project cost into additional water conservation efforts would reduce groundwater overdraft, reducing or eliminating the impetus for the proposed project.

CVWD Wastewater trends, 2000-2021



Source: CVWD Comprehensive Annual Financial Reports

Some of the above organizations protested CVWD’s 2016 Wastewater Change Petition (WW0093) to the State Water Resources Control Board (SWRCB) based on concerns about the environmental impacts of this decrease in discharge. Since CVWD filed WW0093, California’s Salton Sea Management Program (SSMP) has expanded capacity and, in collaboration with Riverside County and the Salton Sea Authority, has developed initial plans for a North Lake that would depend on inflows from the Whitewater River. As we’ve noted previously, while the magnitude of WRP4’s impacts to Salton Sea inflows as a whole would be nominal, they would pose significant adverse impacts to the state’s and the county’s proposed habitat and dust suppression project near the mouth of the Whitewater River – one of a very few SSMP projects currently envisioned for Riverside County.

The potential impacts of this project on critical resources, such as biology, water quality, greenhouse gas emissions, land use, and air quality, are a significant concern for the communities most likely to be affected by

the proposed project. It is imperative that the project's EIR reflect a rigorous and comprehensive analysis of current conditions, with a firm focus on public health and biological resources. This analysis must assess both individual and cumulative impacts to safeguard the community's well-being and prevent any further harm. In particular, the project EIR must convey a clear and thorough understanding of how the project will affect the Salton Sea and proposed SSMP projects, given the potential increase in playa exposure resulting from water diversion, as it could exacerbate pre-existing air quality and public health issues.

Biological Resources

The draft EIR should assess reasonably foreseeable and potentially significant impacts on the riparian corridor downstream from WRP4's discharge to the Whitewater River and the potential impacts resulting from diminished water supply availability for the proposed SSMP North Lake project. The draft EIR should also analyze any potential conflicts the proposed project may pose to plans and policies adopted by the Coachella Valley Mountains Conservancy.

Hydrology/Water Quality

The draft EIR should state CVWD's assumptions of future surface and groundwater availability, to clarify the implied purpose and need for the proposed project. How will CVWD's proposal to reduce groundwater recharge, to protect elevations at Lake Mead, affect future groundwater availability? Will the impacts of reduced recharge exceed the potential benefits of groundwater substitution for irrigators expected to purchase recycled water from WRP4? Does CVWD contemplate using some or all of the water available to it under the QSA transfers, or will it continue to make that water available to other Colorado River contractors? What is the relative cost of not taking the QSA water in comparison to the cost of the proposed project?

Greenhouse Gas Emissions

The State of California has prioritized the reduction of greenhouse gas (GHG) emissions, enacting legislation to accelerate the transition to renewable energy and requiring large companies to disclose their emissions. Such emissions exacerbate climate change, leading to a hotter, drier climate and reduced Colorado River runoff, directly affecting CVWD's water supply reliability. CVWD should strive to reduce - not increase - its total carbon footprint. The draft EIR should analyze the energy requirements of the proposed project and the additional GHG impact of treating WRP4 water to tertiary standards and pumping that water to new users. The draft EIR should clearly identify the potential sources of energy to meet that new demand.

By compounding the decline of the Salton Sea, the project may cause increased GHG emissions, which should be analyzed.

Land use/Planning

Figure 1 in the NOP shows the proposed Phase 1 Recycled Water Delivery Pipeline running directly south of WRP4 along Fillmore Street. One arm of this pipeline terminates ¼ mile south of the plant, immediately east of a section of undeveloped (or currently unirrigated) land. The Phase 2 and 3 pipelines are also adjacent to undeveloped (or currently unirrigated) land. The draft EIR should analyze the potential for the proposed recycled water to be purchased by the owners of this unirrigated land, resulting in a net increase in irrigation. The question of the cost of the recycled water likely falls beyond the scope of the draft EIR but directly affects the likelihood that irrigators will purchase such water. How much does CVWD plan to charge irrigators to use the recycled water? CVWD's current [canal water service rates](#) of \$34.32/AF are significantly less than the cost of recycled water in other areas. In recent years, CVWD has delivered more than 9,000 AF of recycled water

annually, though the cost of this recycled water does not appear to be posted on the CVWD website. The City of Riverside's 2008 [Wastewater Collection and Treatment Facilities Integrated Master Plan](#) reports annual operations and maintenance costs for tertiary treatment of about \$100/AF (in 2006\$), over and above the costs of primary and secondary treatment and independent of capital costs. Adjusted for inflation, this is more than triple the cost of CVWD's standard canal water service rate. Has CVWD identified customers willing to pay this premium for recycled water? Or will CVWD subsidize the annual cost of this water?

Air Quality

As noted previously, the reasonably foreseeable impact of the proposed project would be to deprive the SSMP of water needed for its proposed North Lake project at the mouth of the Whitewater River. As a result, the project might be reduced in size or not constructed at all. Assuming ten acre-feet per North Lake surface acre suggests that the proposed project could indirectly result in the loss of more than 500 wetted project acres, leaving that much Salton Sea lakebed exposed and increasing dust emissions and air quality impacts in the region. The draft EIR should analyze these reasonably foreseeable and avoidable impacts.

Cumulative Impacts

The draft EIR should fully analyze the range of projects that could affect regional resources. While the individual impact of any of these projects, including WRP4, could be *de minimis*, the cumulative impact of these various small projects could well rise to the level of significant and adverse.

Additional Action Alternative

We strongly encourage CVWD to add an additional action alternative for comparison and analysis within the draft EIR. To meet the implied purpose and need of treating wastewater and reducing groundwater use, the draft EIR should include a new action item that would recognize the huge opportunities for residential water conservation within CVWD's service area. According to CVWD's "[water conservation and production reports](#)" submitted to the SWRCB, CVWD's average residential water use in 2022 was about 237 gallons per person per day (GPCD), 27% higher than the regional average and more than double the City of Coachella's rate that year. The new action alternative would include a variety of indoor and outdoor water conservation activities, to reduce CVWD's residential GPCD to the regional average of 186 ([as reported by the SWRCB](#)), conserving roughly 15,000 acre-feet of water annually - more than triple the amount of recycled water to be produced by the proposed project. This conservation would also reduce the volume of wastewater to be treated by WRP4, delaying or avoiding the need to expand the plant's capacity.

These residential water conservation actions should recognize new state law. The day after the release of the NOP, the governor signed AB 1572, prohibiting the use of potable water for the irrigation of nonfunctional turf (with some exceptions). CVWD has [an informative webpage](#) defining nonfunctional turf and describing the impacts of an earlier, more limited emergency regulation that temporarily banned its irrigation. AB 1572's impacts on water use in the CVWD service should be analyzed in the draft EIR; we believe that the enforcement of this new statute may, on its own, eliminate the need for the proposed project.

Simply put, we assert that CVWD could meet the purpose and need for the proposed project at less cost and with far lower - or no - adverse environmental impacts by investing a portion of the project cost into expanding its water conservation efforts. At minimum, the draft EIR should analyze a new action alternative that targets the reduction of residential GPCD to the regional average.

Public Outreach

Two representatives of our organizations attended the public scoping meeting on Wednesday, November 1st at CVWD's Palm Desert office, a location more than a 30-minute drive from the proposed project location and from the communities most likely to be affected by the proposed project. We understand that these were the only two members of the public to attend the meeting. The meeting did not appear to be well-publicized. The meeting was not listed on CVWD's public events calendar and did not appear prominently on CVWD's website. Please send us a list of media outlets and social media platforms where this public scoping meeting was announced. To increase public awareness of this proposed project, we strongly encourage CVWD to hold another public scoping meeting and publicize this additional meeting broadly via traditional and social media announcements in both English and Spanish, in a location near the project site and near affected communities and extend the scoping period two weeks after the date of this additional and needed scoping meeting.

We also emphasize the importance of making the public workshops more accessible and holistic in their presentation. These workshops should provide a comprehensive understanding of the project's purpose, community benefits, and areas of concern, ensuring that the public can actively participate and contribute to the decision-making process.

Thank you for your attention to these comments. We would be happy to discuss any of these comments with you and your staff and look forward to reviewing the draft EIR.

Sincerely,

Michael Cohen
Senior Associate
Pacific Institute

Aydee Palomino
Environmental Justice Campaign Project Manager
Alianza Coachella Valley

Frank Ruiz
Salton Sea Program Manager
Audubon California

Krystal Otworth
Policy Advocate
Leadership Counsel for Justice & Accountability

Joan Taylor
Chair, CA/NV Desert Committee
Sierra Club

Isabella B. Arzeno-Soltero
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Ryan Sinclair
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Loma Linda University School of Public Health



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www.wildlife.ca.gov

November 13, 2023
Sent via email

William Patterson
Environmental Supervisor
Coachella Valley Water District
75515 Hovley Lane East
Palm Desert, CA 92211

Subject: Notice of Preparation of a Draft Environmental Impact Report
Water Reclamation Plant No. 4 Non-Potable Water Improvements Project
State Clearinghouse No. 2023100315

Dear William Patterson:

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from the Coachella Valley Water District for the Water Reclamation Plan No. 4 Non-Potable Water Improvements Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

CDFW is also submitting comments as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

The proposed Project is located southeast of Avenue 62 on Filmore Street in the City of Thermal, in an unincorporated area of Riverside County. The Project area is bordered by Avenue 62 to the north, Avenue 64 to the south, Filmore Street to the west, and the Whitewater River to the east. The Project encompasses Accessor's Parcel Number (APN) 749-030-035. The Project site is located within the boundaries of the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP).

The Project proposes constructing tertiary treatment facilities within the existing Water Reclamation Plant No. 4 (WRP 4) plant site to enable production of up to 10 million gallons per day (MGD) of non-potable recycled water for irrigation. Coachella Valley Water District has developed three phases to achieve 10 MGD production and distribution:

- Phase 1 would include construction and operation of a 1-MGD packaged cloth disk filtration system and an ultraviolet (UV) disinfection treatment plant as part of an overall treatment facility incorporating infrastructure expandable to 2.5 MGD. Coachella Valley Water District would construct a new reservoir serving as a regulatory structure within WRP 4 and repurpose an existing irrigation pipeline to deliver a blend of recycled water and canal water to customers located south of WRP 4.
- Phase 2 would incorporate additional equipment at WRP 4 to treat up to 2.5 MGD of tertiary treated recycled water, with onsite infrastructure expandable to 10 MGD, and construction of new distribution pipelines to deliver 2.5 MGD of recycled water.
- Phase 3 would increase treatment capacity at WRP 4 to up to 10 MGD. Similar to Phase 2, new recycled water delivery pipelines would be constructed to accommodate delivery of 10 MGD to agricultural customers. Phase 3 includes the construction of distribution pipelines that would cross the Whitewater River.

Treated effluent from the WRP 4 is currently discharged to the Whitewater River. The proposed project would enable Coachella Valley Water District to provide recycled water at WRP 4, which may reduce the discharge of treated effluent into the Whitewater River.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the Coachella Valley Water District in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. The comments and recommendations are also offered to enable the CDFW to adequately review and comment on the proposed Project with respect to the Project's consistency with the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP).

CDFW recommends that the forthcoming DEIR address the following:

Assessment of Biological Resources

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. To enable CDFW staff to adequately review and comment on the project, the DEIR should include a complete assessment of the flora and fauna within and adjacent to the Project footprint, with particular emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats.

The CDFW recommends that the DEIR specifically include:

1. An assessment of the various habitat types located within the project footprint, and a map that identifies the location of each habitat type. CDFW recommends that floristic, alliance- and/or association-based mapping and assessment be completed following *The Manual of California Vegetation*, second edition (Sawyer et al. 2009²). Adjoining habitat areas should also be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
2. A general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the project. CDFW's California Natural Diversity Database (CNDDDB) in Sacramento should be contacted at (916) 322-2493 or CNDDDB@wildlife.ca.gov or <https://wildlife.ca.gov/Data/CNDDDB/Maps-and-Data> to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the proposed Project.

² Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. A manual of California Vegetation, 2nd ed. California Native Plant Society Press, Sacramento, California. <http://vegetation.cnps.org/>

CDFW's CNDDDB is not exhaustive in terms of the data it houses, nor is it an absence database. CDFW recommends that it be used as a starting point in gathering information about the *potential presence* of species within the general area of the project site.

3. A complete, *recent* inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish & G. Code, § 3511). Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. CVMSHCP surveys, completed by a CVMSHCP Acceptable Biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Note that CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.
4. A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW 2018³)
5. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]).
6. A full accounting of all open space and mitigation/conservation lands within and adjacent to the Project.

Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources

The DEIR should provide a thorough discussion of the direct, indirect, and cumulative impacts expected to adversely affect biological resources as a result of the Project. To

³ CDFW, 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities, State of California, California Natural Resources Agency, Department of Fish and Wildlife: March 20, 2018 (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>)

ensure that Project impacts to biological resources are fully analyzed, the following information should be included in the DEIR:

1. A discussion of potential impacts from lighting, noise, human activity (e.g., recreation), defensible space, and wildlife-human interactions created by zoning of development projects or other project activities adjacent to natural areas, exotic and/or invasive species, and drainage. The latter subject should address Project-related changes on drainage patterns and water quality within, upstream, and downstream of the Project site, including: volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site.
2. A discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the project footprint, such as nearby public lands (e.g., National Forests, State Parks, etc.), open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands (e.g., preserved lands associated with a Natural Community Conservation Plan, or other conserved lands).

Please note that the Project area including surrounding habitat supports significant biological resources and contains habitat connections, providing for wildlife movement across the broader landscape, sustaining both transitory and permanent wildlife populations. The Project is located adjacent to the Whitewater River, an area which supports important biological resources including Sonoran cottonwood-willow riparian forest habitat and the wildlife it supports. Adjacent areas in the Whitewater River support nesting, foraging, refugia, and burrowing habitat and a serve as a movement corridor for a variety of wildlife. Also, the Coachella Valley Stormwater Channel and Delta Conservation Area (Conservation Area) under the CVMSHCP is located approximately 1 mile downstream and within the Whitewater River, an area that supports CVMSHCP Covered Species including, but not limited to, desert pupfish (*Cyprinodon macularius*; State and Federally Endangered), crissal thrasher (*Toxostoma crissale*), burrowing owl (*Athene cunicularia*; Species of Special Concern), Yuma clapper rail (*Rallus longirostris yumanensis*; Fully Protected Species), and California black rail (*Laterallus jamaicensis coturniculus*; Fully Protected Species). The Conservation Area also contains suitable migration and breeding habitat for riparian species covered under the CVMSHCP, such as summer tanager (*Piranga rubra*), yellow warbler (*Setophaga petechia*), yellow-breasted chat (*Icteria virens*), and least Bell's vireo (*Vireo bellii pusillus*; Federally and State Endangered). Per CVMSHCP Section 4.3.20, this Conservation Area is "sustained largely by agricultural runoff, *the discharge for treated water into the Whitewater Stormwater Channel*, and runoff from infrequent storm events." These species protected by the Conservation Area downstream may also be present in habitat within the Whitewater River located adjacent to the Project site. CDFW encourages a

project design that avoids and preserves biological resources and features that contribute to habitat connectivity within the adjacent Whitewater River and the downstream Conservation Area. The DEIR should include a discussion of both direct and indirect impacts to wildlife movement and connectivity, including maintenance of wildlife corridor/movement areas to adjacent undisturbed habitats.

3. An evaluation of impacts to adjacent open space lands from both the construction of the Project and any long-term operational and maintenance needs. As discussed further above, the proposed Project has the potential to impact the Conservation Area located approximately one mile downstream. CDFW encourages the Coachella Valley Water District to contact the Coachella Valley Conservation Commission (Implementing Entity for the CVMSHCP) to determine the extent that the project will impact the Conservation Area, and to work collaboratively to avoid and minimize impacts.
4. A cumulative effects analysis developed as described under CEQA Guidelines section 15130. Please include all potential direct and indirect Project related impacts to riparian areas, wetlands, vernal pools, alluvial fan habitats, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and other sensitive habitats, open lands, open space, and adjacent natural habitats in the cumulative effects analysis. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Alternatives Analysis

CDFW recommends the DEIR describe and analyze a range of reasonable alternatives to the Project that are potentially feasible, would “feasibly attain most of the basic objectives of the Project,” and would avoid or substantially lessen any of the Project’s significant effects (CEQA Guidelines § 15126.6[a]). The alternatives analysis should also evaluate a “no project” alternative (CEQA Guidelines § 15126.6[e]).

Mitigation Measures for Project Impacts to Biological Resources

The DEIR should identify mitigation measures and alternatives that are appropriate and adequate to avoid or minimize potential impacts, to the extent feasible. The Coachella Valley Water District should assess all direct, indirect, and cumulative impacts that are expected to occur as a result of the implementation of the Project and its long-term operation and maintenance. When proposing measures to avoid, minimize, or mitigate impacts, CDFW recommends consideration of the following:

1. *Fully Protected Species*: Fully protected species may not be taken or possessed at any time (with the exception of certain projects set forth in SB 147, which was passed on July 10, 2023). Project activities described in the DEIR should generally

be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area. CDFW also recommends that the DEIR fully analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends that Coachella Valley Water District include in the analysis how appropriate avoidance, minimization, and mitigation measures will reduce indirect impacts to fully protected species. Fully protected species with the potential or have been documented to occur within or adjacent to the Project area include: Yuma clapper rail and California black rail.

2. *Sensitive Plant Communities*: CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDDB and are included in *The Manual of California Vegetation* (Sawyer et al. 2009). The DEIR should include measures to fully avoid and otherwise protect sensitive plant communities from project-related direct and indirect impacts.
3. *California Species of Special Concern (CSSC)*: CSSC status applies to animals generally not listed under the federal Endangered Species Act or the CESA, but which nonetheless are declining at a rate that could result in listing, or historically occurred in low numbers and known threats to their persistence currently exist. CSSCs should be considered during the environmental review process. CSSC have the potential or have been documented to occur within or adjacent to the Project area, including, but not limited to: burrowing owl.
4. *Mitigation*: CDFW considers adverse project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the DEIR should include mitigation measures for adverse project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, onsite habitat restoration and/or enhancement, and preservation should be evaluated and discussed in detail. Where habitat preservation is not available onsite, offsite land acquisition, management, and preservation should be evaluated and discussed in detail.

The DEIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

If sensitive species and/or their habitat may be impacted from the Project, CDFW recommends the inclusion of specific mitigation in the DEIR. CEQA Guidelines section 15126.4, subdivision (a)(1)(8) states that formulation of feasible mitigation measures should not be deferred until some future date. The Court of Appeal in *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645 struck down mitigation measures which required formulating management plans developed in consultation with State and Federal wildlife agencies after Project approval. Courts have also repeatedly not supported conclusions that impacts are mitigable when essential studies, and therefore impact assessments, are incomplete (*Sundstrom v. County of Mendocino* (1988) 202 Cal. App. 3d. 296; *Gentry v. City of Murrieta* (1995) 36 Cal. App. 4th 1359; *Endangered Habitat League, Inc. v. County of Orange* (2005) 131 Cal. App. 4th 777).

CDFW recommends that the DEIR specify mitigation that is roughly proportional to the level of impacts, in accordance with the provisions of CEQA (CEQA Guidelines, §§ 15126.4(a)(4)(B), 15064, 15065, and 16355). The mitigation should provide long-term conservation value for the suite of species and habitat being impacted by the Project. Furthermore, in order for mitigation measures to be effective, they need to be specific, enforceable, and feasible actions that will improve environmental conditions.

5. *Habitat Revegetation/Restoration Plans*: Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum:
 - (a) the location of restoration sites and assessment of appropriate reference sites;
 - (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates;
 - (c) a schematic depicting the mitigation area;
 - (d) a local seed and cuttings and planting schedule;
 - (e) a description of the irrigation methodology;
 - (f) measures to control exotic vegetation on site;
 - (g) specific success criteria;
 - (h) a detailed monitoring program;
 - (i) contingency measures should the success criteria not be met; and
 - (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

CDFW recommends that local onsite propagules from the Project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be initiated in advance of project impacts in order to accumulate sufficient propagule material for subsequent use in future years. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various project

components as appropriate.

Restoration objectives should include protecting special habitat elements or re-creating them in areas affected by the Project; examples could include retention of woody material, logs, snags, rocks, and brush piles.

6. *Nesting Birds and Migratory Bird Treaty Act*: Please note that it is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Fish and Game Code sections 3503, 3503.5, and 3513 afford protective measures as follows: Fish and Game Code section 3503 makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird except as provided by the rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. § 703 et seq.).

CDFW recommends that the DEIR include the results of avian surveys, as well as specific avoidance and minimization measures to ensure that impacts to nesting birds do not occur. Project-specific avoidance and minimization measures may include, but not be limited to: project phasing and timing, monitoring of project-related noise (where applicable), sound walls, and buffers, where appropriate. The DEIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the project site. If pre-construction surveys are proposed in the DEIR, the CDFW recommends that they be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted sooner.

7. *Moving out of Harm's Way*: To avoid direct mortality to any non-listed terrestrial wildlife, CDFW recommends that the lead agency condition the DEIR to require that a CDFW-approved qualified biologist be retained to be onsite prior to and during all ground- and habitat-disturbing activities to inspect the Project area prior to any Project activities. Any individuals found shall not be harassed and shall be allowed to leave the Project area unharmed. If needed, a qualified biologist may guide, handle, or capture an individual non-listed, non-special-status wildlife species to move it to a nearby safe location within nearby refugium, or it shall be allowed to leave the Project site of its own volition. Capture methods may include hand, dip net, lizard lasso, snake tongs and snake hook. If the wildlife species is discovered or is caught in any pits, ditches, or other types of excavations, the qualified biologist shall release

it into the most suitable habitat near the site of capture. Movement of wildlife out of harm's way should be limited to only those individuals that would otherwise be injured or killed, and individuals should be moved only as far as necessary to ensure their safety (i.e., CDFW does not recommend relocation to other areas). Only biologists with appropriate authorization by CDFW shall move CESA-listed or other special-status species. Furthermore, it should be noted that the temporary relocation of onsite wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss.

8. *Translocation of Species*: CDFW generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species as studies have shown that these efforts are experimental in nature and largely unsuccessful.

California Endangered Species Act

CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to CESA. CDFW recommends that a CESA Incidental Take Permit (ITP) be obtained if the Project has the potential to result in "take" (California Fish and Game Code Section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") of State-listed CESA species, either through construction or over the life of the project; unless this Project is proposed to be a covered activity under the CVMSHCP. It is the policy of CESA to conserve, protect, enhance, and restore State-listed CESA species and their habitats.

CDFW encourages early consultation, as significant modification to the proposed Project and avoidance, minimization, and mitigation measures may be necessary to obtain a CESA ITP. CDFW must comply with CEQA for issuance of a CESA ITP. CDFW therefore recommends that the DEIR addresses all Project impacts to listed species and specify a mitigation monitoring and reporting program that will meet the requirements of CESA.

Coachella Valley Multiple Species Habitat Conservation Plan

Within the Inland Deserts Region, CDFW issued Natural Community Conservation Plan Approval and Take Authorization for the CVMSHCP per Section 2800, *et seq.*, of the California Fish and Game Code on September 9, 2008. The CVMSHCP establishes a multiple species conservation program to minimize and mitigate habitat loss and provides for the incidental take of covered species in association with activities covered under the permit.

Compliance with approved habitat plans, such as the CVMSHCP, is discussed in CEQA. Specifically, Section 15125(d) of the CEQA Guidelines requires that the CEQA

document discuss any inconsistencies between a proposed Project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. An assessment of the impacts to the CVMSHCP as a result of this Project is necessary to address CEQA requirements. To obtain additional information regarding the CVMSHCP please go to: <http://www.cvmshcp.org/>.

The proposed Project occurs within the CVMSHCP area and is subject to the provisions and policies of the CVMSHCP. In order to be considered a covered activity, Permittees should demonstrate that proposed actions are consistent with the CVMSHCP and its associated Implementing Agreement.

Regardless of whether take of threatened and/or endangered species is obtained through the CVMSHCP or through a CESA ITP, the DEIR needs to address how the proposed Project will affect the conservation objectives of the CVMSHCP. Therefore, all surveys required by the CVMSHCP to determine consistency should be conducted and results included in the DEIR so that CDFW can adequately assess whether the Project will impact the CVMSHCP.

CDFW Lake and Streambed Alteration Program

Based on review of material submitted with the NOP and review of aerial photography, the Tertiary Treatment Upgrades portion of Project is located directly adjacent to the Whitewater River while the Phase 3 Recycled Water Delivery Pipeline portion of the Project is located within the Whitewater River. Depending on how the Project is designed and constructed, it is likely that the Project applicant will need to notify CDFW per Fish and Game Code section 1602. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: Substantially divert or obstruct the natural flow of any river, stream or lake; Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or Deposit debris, waste or other materials that could pass into any river, stream or lake. Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow.

Upon receipt of a complete notification, CDFW determines if the proposed Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify your Project that would eliminate or reduce harmful impacts to fish and wildlife resources.

CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if necessary, the

DEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the proposed Project may be required to avoid or reduce impacts to fish and wildlife resources. To submit a Lake or Streambed Alteration notification package, please go to <https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS>.

ADDITIONAL COMMENTS AND RECOMMENDATIONS

Construction Noise

Project-related construction has the potential to generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project. CDFW recommends that the DEIR include an analysis of impacts to wildlife from Project-related construction noise, and appropriate avoidance, minimization, and mitigation measures that will reduce impacts to less than significant.

Construction may result in substantial noise through road use, equipment, and other Project-related activities. This may adversely affect wildlife species in several ways as wildlife responses to noise can occur at exposure levels of only 55 to 60 dB⁴. Anthropogenic noise can disrupt the communication of many wildlife species including frogs, birds, and bats^{5,6,7,8}. Noise can also affect predator-prey relationships as many nocturnal animals such as bats and owls primarily use auditory cues (i.e., hearing) to hunt. Additionally, many prey species increase their vigilance behavior when exposed to noise because they need to rely more on visual detection of predators when auditory cues may be masked by noise^{9,10}. Noise has also been shown to reduce the density of nesting birds¹¹ and cause increased stress that results in decreased immune

⁴ Barber, J. R., K. R. Crooks, and K. M. Fristrup. 2009. The costs of chronic noise exposure for terrestrial organisms. *Trends in Ecology and Evolution* 25:180-189.

⁵ Sun, J. W. C., and P. M. Narins. 2005. Anthropogenic sounds differentially affect amphibian call rate. *Biological Conservation* 121:419-427.

⁶ Patricelli, G., and J. J. L. Blickley. 2006. Avian communication in urban noise: causes and consequences of vocal adjustment. *Auk* 123:639-649.

⁷ Gillam, E. H., and G. F. McCracken. 2007. Variability in the echolocation of *Tadarida brasiliensis*: effects of geography and local acoustic environment. *Animal Behaviour* 74:277-286.

⁸ Slabbekoorn, H., and E. A. P. Ripmeester. 2008. Birdsong and anthropogenic noise: Implications and applications for conservation. *Molecular Ecology* 17:72-83.

⁹ Rabin, L. A., R. G. Coss, and D. H. Owings. 2006. The effects of wind turbines on antipredator behavior in California ground squirrels (*Spermophilus beecheyi*). *Biological Conservation* 131:410-420.

¹⁰ Quinn, J. L., M. J. Whittingham, S. J. Butler, W. Cresswell, J. L. Quinn, M. J. Whittingham, S. J. Butler, W. Cresswell, and W. Noise. 2017. Noise, predation risk compensation and vigilance in the chaffinch *Fringilla coelebs*. *Journal of Avian Biology* 37:601-608.

¹¹ Francis, C. D., C. P. Ortega, and A. Cruz. 2009. Noise pollution changes avian communities and species interactions. *Current Biology* 19:1415-1419.

responses¹². The Coachella Valley Water District should include measures in the DEIR to ensure the following: restricting the use of equipment to hours least likely to disrupt wildlife (e.g., not at night or in early morning); restricting the use of generators except for temporary use in emergencies; provide power to sites by solar PV (photovoltaic) systems, cogeneration systems (natural gas generator), small micro-hydroelectric systems, or small wind turbine systems; ensure the use of noise suppression devices such as mufflers or enclosure for generators; and sounds generated from any means must be below the 55-60 dB range within 50-feet from the source.

Artificial Nighttime Lighting

The Project may introduce new sources of artificial lighting that could negatively impact biological resources in the adjacent Whitewater River. CDFW recommends that the DEIR include lighting design specifications for all artificial nighttime lighting that will be used by the Project, an analysis of the direct and indirect impacts of artificial nighttime lighting on biological resources, and appropriate avoidance, minimization, and mitigation measures that will reduce impacts to less than significant. The direct and indirect impacts of artificial nighttime lighting on biological resources including migratory birds that fly at night, bats, and other nocturnal and crepuscular wildlife should be analyzed, and appropriate avoidance and minimization measures should be included in the DEIR.

Artificial nighttime lighting often results in light pollution, which has the potential to significantly and adversely affect fish and wildlife. Artificial lighting alters ecological processes including, but not limited to, the temporal niches of species; the repair and recovery of physiological function; the measurement of time through interference with the detection of circadian and lunar and seasonal cycles; the detection of resources and natural enemies; and navigation¹³. Many species use photoperiod cues for communication (e.g., bird song¹⁴), determining when to begin foraging¹⁵, behavioral thermoregulation¹⁶, and migration¹⁷. Phototaxis, a phenomenon that results in attraction and movement towards light, can disorient, entrap, and temporarily blind wildlife species that experience it⁸. The Coachella Valley Water District should include measures in the DEIR to ensure the following: eliminate all nonessential lighting throughout the Project area; avoid or limit the use of artificial light during the hours of dawn and dusk when

¹² Kight, C. R., and J. P. Swaddle. 2011. How and why environmental noise impacts animals: An integrative, mechanistic review. *Ecology Letters* 14:1052–1061.

¹³ Gatson, K. J., Bennie, J., Davies, T., Hopkins, J. 2013. The ecological impacts of nighttime light pollution: a mechanistic appraisal. *Biological Reviews*, 88.4: 912-927.

¹⁴ Miller, M. W. 2006. Apparent effects of light pollution on singing behavior of American robins. *The Condor* 108:130–139.

¹⁵ Stone, E. L., G. Jones, and S. Harris. 2009. Street lighting disturbs commuting bats. *Current Biology* 19:1123–1127.

¹⁶ Beiswenger, R. E. 1977. Diet patterns of aggregative behavior in tadpoles of *Bufo americanus*, in relation to light and temperature. *Ecology* 58:98–108.

¹⁷ Longcore, T., and C. Rich. 2004. Ecological light pollution - Review. *Frontiers in Ecology and the Environment* 2:191–198.

many wildlife species are most active; lighting for Project activities is fully shielded, cast downward, reduced in intensity to the greatest extent, and does not result in spill over onto other properties or upward into the night sky (see the International Dark-Sky Association standards at <http://darksky.org/>); the use of LED lighting with a correlated color temperature of 3,000 Kelvins or less; proper disposal of hazardous waste; and recycling of lighting that contains toxic compounds with a qualified recycler.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). Information can be submitted online or via completion of the CNDDDB field survey form at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

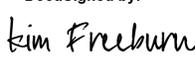
FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.).

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP of a DEIR for the Water Reclamation Plant No. 4 Non-Potable Water Improvements Project (SCH No. 2023100315) and recommends that the Coachella Valley Water District address CDFW's comments and concerns in the forthcoming DEIR. Questions regarding this letter or further coordination should be directed to Jacob Skaggs, Senior Environmental Scientist Specialist, at jacob.skaggs@wildlife.ca.gov.

Sincerely,

DocuSigned by:

84F92FFEEFD24C8...

Kim Freeburn
Environmental Program Manager

William Patterson, Environmental Supervisor
Coachella Valley Water District
November 13, 2023
Page 15

ec: Heather Brashear, Senior Environmental Scientist (Supervisor), CDFW
Heather.Brashear@wildlife.ca.gov

Office of Planning and Research, State Clearinghouse, Sacramento
state.clearinghouse@opr.ca.gov



TU, 28 NOV '23

Imperial County Planning & Development Services Planning / Building

November 20, 2023

Jim Minnick
DIRECTOR

Coachella Valley Water District
Attention: William Patterson, Environmental Supervisor
75515 Hovley Lane East
Palm Desert, CA 92211

SUBJECT: CVWD Water Reclamation Plant No. 4 Non-Potable Water Improvements Project

Dear Mr. Patterson:

The Imperial County Planning & Development Services Department (ICPDS) appreciates the opportunity to be included in the review process of the Notice of Preparation for the preparation of the Environmental Impact Report (EIR) for the Water Reclamation Plant No. 4 (WRP 4) Non-Potable Water (NPW) Improvements Project. The proposed project would construct tertiary treatment facilities within the existing WRP 4 plant site to enable production of up to 10 MGD of non-potable recycled water for agricultural irrigation which is planned to be achieved in three phases.

According to the West Shores/Salton City Community Area Plan, the Coachella Valley Water District provides potable water to residents within the unincorporated communities of Imperial County including Desert Shores, Salton City, and Bombay Beach.

After reviewing the project information provided, the Imperial County Planning & Development Services Department would like to advise that we have no comments in reference to this project. However, ICPDS requests to be informed of any changes or modifications to the project to verify any additional requirements that may be triggered by the change.

Should you have any questions regarding this matter, please feel free to contact Gerardo A. Quero, Planner II at (442) 265-1736, extension 1748 or via-email at gerardoquero@co.imperial.ca.us.

Sincerely,

JIM MINNICK, Director
Imperial County Planning & Development Services

By: 
Gerardo A. Quero
ICPDS, Planner II

CC: William Patterson @ WPatterson@cvwd.org
Jim Minnick, ICPDS Director
Michael Abraham, AICP Assistant ICPDS Director
Diana Robinson, Planning Division Manager
File: Comment Letter CVWD 10.109

IC-ENGINEERING
IC-ENVIRONMENTAL SERVICES
IC-ADMINISTRATION
File: 1150.021
0710.1810.26

QQJGS:ALLUSERS\ICPDS COMMENT LETTERS\ICPDS COMMENT LETTER CVWD WRP4.DOCX

Attachment 4: Scoping Meeting Verbal Comments

November 1, 2023

NOP Scoping Meeting Public Comments

Coachella Valley Water District WRP No. 4 Recycled Water Project

Speaker 1

- Sierra Club has protested due to potential effects to Salton Sea and its remediation projects
- Master Plan is outdated and the numbers are not reliable
- How will Colorado River water availability affect project and Salton Sea remediation projects
- Salton Sea inflows would decrease by 5k-20k AFY when average flows are 30k AFY
- Didn't find the notice of the NOP anywhere

Speaker 2

- There should be public meetings at Thermal or Mecca, closer to the project site
- There are concerns about playa exposure and public health impact of the playa exposure
- There should be a meeting held closer to Thermal
- Spanish translations should be provided
- The presentations and documents should be in easy-to-understand language
- What are the timelines for each of the phases?
- Will EIR include all three phases?