



Palm Desert Groundwater Replenishment Project

Addendum No. 1 to the Final Environmental Impact Report
SCH#2017041072

prepared by

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October 2019



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Acronyms and Abbreviations

AFY	Acre Feet Per Year
APN	Assessor’s Parcel Number
AQAP	Air Quality Attainment Plan
BMPs	Best Management Practices
Caltrans	California Department of Transportation
CEQA	California Environmental Quality Act
CO ₂ e	carbon dioxide equivalent
CVWD	Coachella Valley Water District
EIR	Environmental Impact Report
GHG	Greenhouse Gas
MVP	Mid-Valley Pipeline
MMRP	Mitigation Monitoring and Reporting Plan
NPDES	National Pollutant Discharge Elimination System
PM ₁₀	Particulate Matter less than 10 microns in diameter
SUSMP	Standard Urban Stormwater Mitigation Plan
SCAQMD	South Coast Air Quality Management District
MMRP	Mitigation Monitoring and Reporting Program
SCH	State Clearinghouse
SWPPP	Stormwater Pollution Prevention Plan
WWRSC	Whitewater River Stormwater Channel

1 Introduction

The Coachella Valley Water District (CVWD) has prepared this Addendum No. 1 (Addendum) in accordance with the California Environmental Quality Act (CEQA) and the 2019 *State CEQA Guidelines and CVWD Local CEQA Guidelines*. This document serves as an Addendum to the previously approved Environmental Impact Report (EIR) for the Palm Desert Groundwater Replenishment Project (Original Project), approved on January 9, 2018, by CVWD's Board of Directors (State Clearinghouse [SCH] #2017041072). CVWD is the lead agency for the Original Project and the proposed modifications to the Original Project (Modified Project) discussed in this Addendum.

This Addendum addresses proposed minor modifications to the Original Project. Section 15164 of the *State CEQA Guidelines* states the following with respect to an Addendum to an EIR:

- (a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- (d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

The background and purpose for this Addendum is discussed below, followed by a description of the Modified Project and an overview of changes between the Modified Project and the Original Project. As described within this document, substantial evidence demonstrates that the minor changes to the pond configuration and installation of concrete slope-lining protection for the Palm Desert Groundwater Replenishment Project does not involve any new significant environmental impacts or a substantial increase in the severity of the impacts identified in the EIR.

1.1 Background and Purpose of the EIR Addendum

The EIR for the Original Project (SCH #2017041072) was certified in January 2018, and consists of the text of the Draft EIR and responses to public and agency comments received on the Draft EIR. The EIR is accompanied by a Mitigation Monitoring and Reporting Program (MMRP), which provides guidance for implementation of the mitigation measures developed for the Original Project, in addition to the Findings of Fact and Statement of Overriding Considerations (Findings) document. Information and technical analyses from the EIR are utilized or referenced throughout this Addendum.

The EIR is available for review at CVWD's offices located at 75515 Hovley Lane East in Palm Desert, California. In conjunction with certification of the EIR, CVWD adopted the MMRP and Findings document, and approved the Original Project.

Purpose of the Addendum

CVWD now proposes minor modifications to the Original Project which developed since certification of the EIR for the Palm Desert Groundwater Replenishment Project and approval of the Original Project; the Original Project with proposed modifications is referred to as the "Modified Project."

This document is an Addendum to the previously certified EIR and has been prepared by CVWD to evaluate the potential environmental impacts of the proposed Modified Project. This Addendum has been prepared in accordance with the relevant provisions of CEQA and Section 15164 of the *State CEQA Guidelines*. A detailed description of the Modified Project is provided in Section 2, *Project Description*, of this Addendum.

1.2 Basis and Rationale for the Addendum

When a Final EIR has been certified and a project is modified or otherwise changed after adoption, additional CEQA review may be necessary. The key considerations in determining the need for the appropriate type of additional CEQA review are outlined in Section 21166 of the Public Resources Code (CEQA Statute) and Sections 15162, 15163 and 15164 of the *State CEQA Guidelines*. Section 15162(a) of the *State CEQA Guidelines* provides that a Subsequent EIR is not required (in response to project modifications) unless the following occurs:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available, and shows the project will have new or substantially more severe significant effects.

An Addendum to the EIR is appropriate to address the proposed Modified Project because the proposed modifications do not meet the conditions of Section 15162(a) for preparation of a Subsequent EIR, as listed above. The proposed Modified Project would not result in new or more severe impacts related to: 1) substantial changes to the Original Project which requires major revisions to the certified Final EIR; 2) substantial changes to the circumstances under which the Original Project are being undertaken which will require major revisions to the certified Final EIR; or 3) new information of substantial importance showing significant effects not previously examined.

The Project Description provided in Section 2 and the Impact Analysis provided in Section 3 demonstrate that the Modified Project would not result in substantial changes to the EIR and would not alter impact characterizations presented in the EIR. Potential impacts would be the same or comparable to impacts as described in the EIR. The EIR and this Addendum to the EIR serve as informational documents to inform decision-makers and the public of the potential environmental

consequences of approving the proposed Modified Project. This Addendum neither controls nor determines the ultimate decision for approval of the proposed Modified Project. This Addendum to the EIR will be considered by CVWD's Board of Directors at a publicly noticed meeting.

2 Project Description

This Addendum has been prepared to assess potential impacts of the Modified Project compared to the impacts of the Original Project as provided in the EIR. Actions included under the Modified Project are specific to portions of Phase II of the Original Project; all other portions of the Original Project would occur as assessed in the EIR. Phase I of the Original Project has been constructed, and is operational.

Project Site

The Project site is located in the central portion of the Coachella Valley in the city of Palm Desert, in central Riverside County. The Modified Project would be located on the same site as described and analyzed in the EIR. The Modified Project is specific to portions of Phase II of the Original Project. Phase II occurs within the existing Whitewater River Stormwater Channel (WWRSC), adjacent to the south-southwest of CVWD's Water Reclamation Plant No. 10 (WRP10) site, located at 43-000 Cook Street in Palm Desert, California. A portion of the Phase II site, which is considered within this Addendum, consists of the WWRSC located between Cook Street and Fred Waring Drive.

Phase II Original Project Description

As analyzed the within EIR, Phase II of the Original Project would occur on the WRP10 site and within the existing WWRSC, located adjacent to the south-southwest of CVWD's WRP10 site. Primary components of Phase II of the project are summarized below. In addition, the status of each item is described.

- Construct berms using native sediments within the Whitewater River Stormwater Channel for the purposes of creating detention basins to receive and infiltrate Colorado River water for replenishing the underlying groundwater basin. [No change to this item]
- Extend the existing Mid-Valley Pipeline within the WWRSC beyond the WRP10 site to convey Colorado River water to the new detention basins included under Phase II of the project. [This item is revised in the Modified Project Description whereas the MVP is now proposed to be located in the northern embankment of the WWRSC.]
- Expand and reconfigure the existing secondary effluent storage ponds within the southern portion of the existing WRP10 site to store approximately 100 million gallons of secondary effluent. [No change to this item.]
- Construct a new Secondary Effluent Pump Station within the WRP10 site to improve the routing of secondary effluent within the existing WRP10 site to the new lower storage ponds and subsequently back to the headworks¹ at the WRP10 site. [*No change to this item.*]

Phase II Modified Project Description

Minor design changes identified under the Modified Project are specific to the portion of Phase II of the Original Project. Components of the Modified Project are shown in Figure 1, and photos of the existing site are provided in Figure 2.

The Modified Project consists of two features:

- Installation of the Mid-Valley Pipeline extension within the northern bank of the stormwater channel (rather than in the bed of the stormwater channel); and
- Installation of concrete slope-lining flood protection along the northern bank of the stormwater channel (new component).

As with the Original Project, the Modified Project would implement three replenishment ponds within the WWRSC for Phase II of the project. The replenishment ponds would be created by the construction of three erodible earthen berms placed across the bottom (bed) of the WWRSC. The berms would tie directly into the southerly channel embankment, as described for the Original Project; however, under the Modified Project the berms would tie into a reinforced concrete diversion structure at the northerly concrete-lined embankment of the WWRSC. The concrete diversion structure would allow low flows which exceed the capacity of the ponds to bypass the facility.

The Modified Project's slope protection would consist of reinforced concrete applied to the northerly slope of the WWRSC, between Cook Street and Fred Waring Drive. The reinforced concrete would be applied at a ratio of 1.5H:1V from the top of the embankment to the invert elevation of the WWRSC, at which point the slope embankment would steepen to a ratio of 1H:1V for approximately ten feet. The top of the slope protection would provide four feet of freeboard protection above the 100-year storm event. The top of the slope protection would also be offset from the existing earthen top of the WWRSC embankment, allowing for the preservation of existing screening vegetation (tamarisk trees) along the top of the embankment, while also allowing for placement of the MVP Extension within the embankment, where it would be protected from flow and erosion damage by the proposed concrete slope protection for bank stabilization.

Three reinforced concrete access ramps would be integrated into the slope protection to access the bottom of each of the three replenishment ponds; the ramps would be configured in accordance with CVWD requirements for access and maintenance of the ponds and berms (Stantec 2019b). Approximately 4,400 cubic yards of concrete would be required to complete construction of the slope protection, access ramps, and low-flow weir structures (Stantec 2019b).

Under pre-project conditions, flow events in the WWRSC occur either as dry-weather flow, local stormwater flow tributary to local storm drains, or regional stormwater flows. Similar to pre-project conditions, dry-weather flow would continue to occur under post-project conditions and would be directed into the low-flow channel. For local storm events, infiltration and/or the continuation of flow downstream of the site would continue to occur under post-project conditions. For regional storm flows, erosion of the berms within the WWRSC would provide for the continuation of flows to downstream of the site (Stantec 2019b).

Hydraulic analyses conducted for the Modified Project indicate the addition of the proposed slope lining would maintain hydraulic characteristics of the channel consistent with the Original Project. The presence of the proposed slope lining would generally cause slight decreases in channel scour depths with corresponding minor increases in flow velocity, which would be accommodated by the proposed freeboard. The four-foot freeboard is also sufficient to provide the WRP10 facility with protection from stormwater flows associated with the 100-year storm event. (Stantec 2019a, 2019b, 2019c)

Coachella Valley Water District
Palm Desert Groundwater Replenishment Project

Figure 1 Project Site

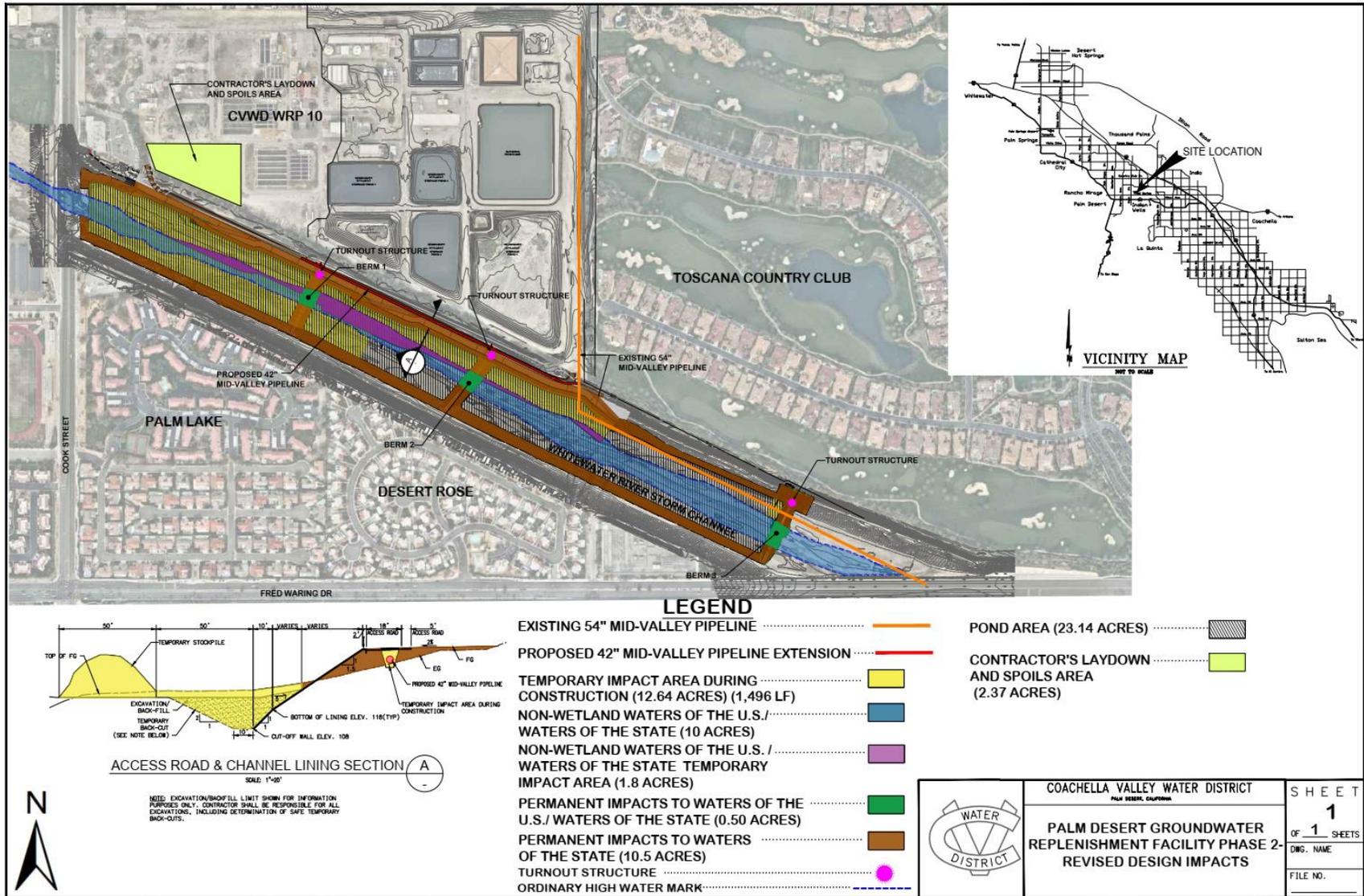


Figure 2 Project Site Photographs

Photograph 1. View from the southern embankment of the WWRSC, just south and downstream of Cook Street, looking across the existing WWRSC toward the northern embankment, where the MVP Extension would be placed within the embankment under the Modified Project. The existing WRP10 site is located just beyond the tamarisk trees that line the WWRSC embankment.



Photograph 2. View from the southern embankment of the WWRSC, at the boundary of the residential development, looking across the WWRSC towards the northern embankment, where a WRP10 existing access road meets the northern embankment. The access road runs along the eastern boundary of the WRP10 site and would remain in place under both the Modified Project and the Original Project.

3 Impact Analysis

This section compares the effects of the Modified Project to those of the Original Project that were analyzed in the EIR. In accordance with Section 15126 of the State CEQA Guidelines, this analysis focuses on the physical environmental changes of the Modified Project, as compared to the environmental impacts of the Original Project. The assessment of each issue area describes impacts of the Modified Project in comparison to the Original Project, along with applicable mitigation measures that were identified for potentially significant impacts as characterized in the EIR, as applicable.

3.1 Aesthetics

The aesthetics impact analysis addresses the short-term (construction-related) and long-term (operations and maintenance-related) impacts on scenic resources, scenic vistas, and the visual character of the Project site and its surrounding area. The Modified Project site is shown on Figure 1, and views of portions of the Project site are provided in photographs in Figure 2. As shown, the location of the Modified Project is visible from the north and south embankments of the WWRSC between Cook Street to the west/north and Fred Waring Drive to the east/south. As such, viewers would have a direct view of the location of the Modified Project from: within CVWD's WRP10 site (restricted from public entry) adjacent to the north; behind the Palm Lake or Desert Rose residential areas where they abut the WWRSC to the south; from the Cook Street bridge over the WWRSC (vehicular or pedestrian access); and from the Fred Waring Drive bridge over the WWRSC (vehicular or pedestrian access). Most viewers of the Project site would be mobile travelers (pedestrian or vehicular) along Cook Street and Fred Waring Drive.

As with the Original Project, temporary aesthetic impacts during construction would occur from the presence of construction vehicles and equipment in the Project area. Construction activities for the Modified Project would involve the use of more concrete and trucks delivering concrete to the Phase II portion of the WWRSC for concrete slope protection for bank stabilization of the northern embankment, and those activities would contribute to the visual character of the Project site during the temporary construction period. However, the Modified Project would not require trenching within the WWRSC for installation of the MVP Extension, and construction of the Modified Project therefore would not include the presence of trenching vehicles and equipment that would contribute to site aesthetics during construction. As with the Original Project, construction activities for the Modified Project would occur in a previously disturbed area and would not affect scenic vistas or high-quality visual resources. Therefore, temporary construction-period impacts to aesthetics would be comparable between the Original Project and the Modified Project, and would continue to be less than significant.

During operation and maintenance of the Modified Project, concrete slope protection for bank stabilization on the northern WWRSC embankment would present a slightly modified visual character than under the Original Project. The site and surrounding area are previously disturbed, and the presence of concrete reinforcement on the WWRSC embankment would not substantially modify the visual environment. In addition, most viewers of the Project site would be mobile travelers (pedestrian or vehicular) along Cook Street and Fred Waring Drive; as such, the concrete reinforcement would only be visible intermittently, while traveling on these roadways.

Operation and maintenance of the Modified Project would involve the same types of activities as the Original Project, except that repairs related to damage such as erosion from stormwater events would not occur as frequently under the Modified Project, due to concrete slope protection for bank stabilization of the northern embankment; aesthetic impacts resulting from the presence of maintenance vehicles and equipment within the WWRSC would therefore be slightly less under the Modified Project. Long-term operational impacts to aesthetics would be comparable between the Original Project and the Modified Project and would be less than significant.

Potential impacts to aesthetics would be comparable to those described in the EIR for the Original Project. No new or substantially more severe significant impacts associated with aesthetics would occur as a result of the Modified Project.

3.2 Agriculture and Forestry Resources

Agricultural impacts are evaluated by comparing anticipated direct temporary and permanent ground disturbance areas associated with the project facilities to farmland mapped on California's Department of Conservation Farmland Mapping and Monitoring Program Important Farmland Series Maps as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and to maps of Williamson Act contracts and zoning maps for the study area. This analysis also evaluates the potential for a project to locate facilities on parcels zoned for agricultural uses, forest land, timberland, or timberland zoned Timber Production. There are no agriculture or forestry resources located on or near the Project site, as described in the EIR. Therefore, as with the Original Project, no impact to agriculture and forestry resources would occur from the Modified Project.

Potential impacts to agriculture and forestry resources would be the same as described in the EIR for the Original Project. No new or substantially more severe significant impacts associated with agriculture and forestry resources would occur as a result of the Modified Project.

3.3 Air Quality

Air quality impacts are characterized by modeling temporary and long-term emissions associated with a project in comparison with air quality standards and regulations for a given project area. The Project site is located in the Salton Sea Air Basin (SSAB) which is bounded by the San Jacinto Mountains to the west, Mojave Desert to the north and east, and the Mexico border to the south. The 2018 Final EIR determined that the Original Project would result in significant short-term construction emissions of the ozone precursor nitrous oxide (NO_x), which would be mitigable to a less than significant level by implementation of best available control technology (BACT) on construction equipment (Mitigation Measure AQ-1). The EIR also determined that the Original Project would not exceed SCAQMD thresholds or expose sensitive receptors to substantial pollutant concentrations, would not emit odors, and would not conflict with the SCAQMD Air Quality Management Plan.

The Modified Project would include the use of concrete trucks and associated equipment during the construction period to apply reinforced concrete lining on the northern WWRSC embankment. This would generate increased emissions during the construction period. However, in the Modified Project, Phase II would occur in a separate year from Phase I, causing annual emissions to be reduced in each year. The CalEEMod model used to estimate emissions for the Original Project was revised to include emissions associated with the Phase II project changes included under the Modified Project. Construction Phase I emissions would remain the same as in the Original Project.

Similarly, operations and maintenance activities under the Modified Project would be the same as assessed for the Original Project, with respect to air quality.

Table 1 summarizes the estimated maximum daily emissions of pollutants for Phase II of the Modified Project, is expected to occur in 2020 (contingent upon issuance of permits by applicable regulatory agencies). Table 1 also shows the maximum daily on-site emissions and localized significance thresholds (LSTs), which only apply to on-site emissions and are not applicable to mobile or off-site emissions. As with the Original Project, the results of the revised CalEEMod for the Modified Project show that construction activities would result in less than significant levels of emissions for all criteria pollutants, including NO_x. As described above, revisions to the CalEEMod employed for analysis of the Modified Project included assessing construction of Phase II in a consecutive year to construction of Phase I, as opposed to modeling construction of both phases simultaneously, as done for the Original Project. This approach reflects actual conditions in the Project area, as construction of Phase I is already complete. The results of the modified CalEEMod analysis indicate construction of the Modified Project would result in slightly lower air quality impacts than construction of the Original Project.

Table 1 Project Phase II Construction Emissions

Construction Phase	Estimated Maximum Daily Emissions (lbs/day)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Phase II (2020 maximum)	5.0	54.1	35.5	<0.1	5.6	3.8
SCAQMD Thresholds	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No
On-Site Emissions	4.9	54.0	34.6	<0.1	5.3	3.8
Local Significance Thresholds (On-Site only)	n/a	425	5,331	n/a	67	19
Threshold Exceeded?	n/a	No	No	No	No	No

lbs/day = pounds per day; SCAQMD

See Appendix A for CalEEMod results. Winter emissions were used for a conservative estimate.

Based on the CalEEMod results presented above, Mitigation Measure AQ-1 (Implementation of BACT) would not be required for conformance with LSTs for the Modified Project. The CalEEMod results are provided as Appendix A to this Addendum.

Operation and maintenance activities would require the occasional use of vehicles to transport CVWD personnel to the Project site for inspections and as-needed repairs of the Project facilities, and the use of these vehicles would produce emissions. In comparison to the Original Project, the Modified Project would result in slightly less operational emissions, because it is anticipated as-needed repairs resulting from stormwater damage would occur less frequently due to the concrete slope protection for bank stabilization of the northern WWRSC embankment under the Modified Project. Potential impacts to air quality during operation of the Modified Project would be less than significant, as with the Original Project.

Potential impacts to air quality would be the same as described in the 2018 Final EIR for the Original Project. No new or substantially more severe significant impacts associated with air quality would occur as a result of the Modified Project.

3.4 Biological Resources

The Modified Project remains within the same footprint and covers the same area as the Original Project, with the addition of a concrete slope protection for bank stabilization and three access ramps to the northern WWRSC embankment, and relocation of the MVP Extension within the northern embankment. As noted in the EIR, the maintained channel contains a lack of biological resources and no direct biological resource impact is anticipated. In addition, the area is disturbed on an ongoing basis through regular maintenance of the channel. Maintenance of the berms (including replacement after storm events) would involve disturbance in this same area, resulting in no change in pre-project conditions.

Consistent with the Original Project, the Modified Project, including relocation of the MVP Extension, is subject to regulation by the California Department of Fish and Wildlife, Colorado River Basin Regional Water Quality Control Board, and United States Army Corps of Engineers, and would comply with permit requirements from applicable regulatory agencies. The use of concrete reinforcement for the northern WWRSC embankment under the Modified Project will reduce the impacts to jurisdictional waters during construction by allowing the MVP Extension to be placed in the channel embankment rather than the channel bed, and also reduces the overall amount of excavation needed. Mitigation Measure Bio-1, *Nesting Bird and Burrowing Owl Avoidance*, and BIO-2, *Consultation with Regulatory Agencies*, would continue to apply to the Modified Project. All potential impacts to biological resources would be comparable between the Modified Project and the Original Project, and would be less than significant with mitigation. No new mitigation would be required for the Modified Project.

Potential impacts biological resources would be the same as described in the EIR for the Original Project. No new or substantially more severe significant impacts associated with biological resources would occur as a result of the Modified Project.

3.5 Cultural, Tribal Cultural, and Paleontological Resources

The Modified Project remains within the same footprint as analyzed in the EIR, and includes the addition of concrete slope protection for bank stabilization and three concrete ramps to the northern WWRSC embankment and relocation of the MVP Extension within the northern embankment.

The Project site is a stormwater channel, which undergoes various levels of disturbance as a result of rain events and routine operation and maintenance activities. The site is surrounded by urban development on all sides. Construction of the Modified Project would require less ground disturbance than the Original Project because the MVP Extension would occur within the northern embankment improvements and trenching of up to 20 feet within the center line of the WWRSC would not be necessary.

As noted in the EIR, Rincon archaeologist Breana Campbell conducted a search of cultural resource records housed at the California Historical Resources Information System (CHRIS), Eastern

Information Center (EIC) located at the University of California, Riverside on May 3, 2017. The search was conducted to identify all previous cultural resources work and previously recorded cultural resources within a 0.5-mile radius of the Project site. Of the resources within the 0.5-mile radius of the Project site, the EIR identified one resource (P-33-000064/CA-RIV-64/H) within the alignment of the Mid-Valley Pipeline of the Original Project. The Original Project including cathodic protection inspection of the Mid-Valley Pipeline in order to confirm structural integrity prior to its extension. This investigation was proposed downstream of the proposed replenishment facility boundaries which overlapped a portion of the northernmost end of this prehistoric village site. However, cathodic protection inspections of the Mid-Valley Pipeline were later determined to be unnecessary and ground disturbing activities in the vicinity of the historical site were no longer a part of the project. Further, the prehistoric village it is not within 0.5 mile of the Modified Project site. Implementation of mitigation measures described in the EIR would further reduce any potential impact to this resource to a less-than-significant level.

As with the Original Project, potential cumulative impacts from the Modified Project are site-specific and would be reduced to a less-than-significant level due to implementation of mitigation measures that would protect cultural, paleontological, and tribal cultural resources. Compliance with CEQA requirements, including the implementation of recommendations in site-specific cultural resource studies, on all new development would ensure that the proposed project would not be cumulatively significant.

Potential impacts to cultural, tribal cultural, or paleontological resources would be slightly less than as described in the EIR for the Original Project, because the Modified Project would not involve trenching to place the MVP Extension within the channel bed. The Modified Project would not result in any new or substantially more severe significant impacts to cultural, tribal cultural, or paleontological resources.

3.6 Geology and Soils

With the modifications discussed in Section 2 of this Addendum, the Modified Project remains within the same footprint and covers the same area as in the Original Project. The Modified Project would not change the geologic conditions at the Project site because the modifications are the addition of concrete lining along the WWRSC and altered alignment of the MVP Extension to within the northern embankment of the Whitewater River Stormwater Channel; the Modified Project retains the same objective for land use, overall development size and development features. Thus, no new impacts related to geology and soils would result from implementation of the Modified Project. Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the Modified Project would not result in any new or substantially more severe significant impacts with respect to geology and soils.

3.7 Greenhouse Gas Emissions

Greenhouse gas impacts are characterized by modeling temporary construction and long-term operational emissions associated with a project in comparison with regional plans, policies and regulations. The Original Project evaluated GHG emissions in comparison with the SCAQMD recommended quantitative GHG threshold of 3,000 million tons (MT) of equivalent carbon dioxide (CO₂e) per year (SCAQMD 2010) since CVWD has not adopted GHG emissions thresholds.

As stated in the EIR, this analysis focuses on carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O) because these make up 98.9 percent of all GHG emissions by volume (SCAQMD 2007) and are the GHG emissions that the Modified Project would emit in the largest quantities. Calculations are based on the methodologies discussed in the CAPCOA (2008) CEQA and Climate Change white paper and included the use of the California Climate Action Registry (2009) General Reporting Protocol.

As noted previously, the Modified Project would include the use of concrete trucks and associated equipment during the construction period to apply reinforced concrete lining on the northern WWRSC embankment. Construction Phase I emissions would remain the same as in the Original Project. Similarly, operations and maintenance activities would be the same as assessed for the Original Project. As described in Section 3.3 (Air Quality) of this document, for the Modified Project, emissions were modeled for Phase I and Phase II occurring in consecutive years (reflecting actual conditions at the time of preparation of this Addendum No. 1) rather than occurring simultaneously, as done for the Original Project in the EIR. The Modified Project would result in slightly increased Phase II emissions due to the use of concrete trucks for the transport of concrete and associated equipment to the Project site during the temporary construction period.

Results of the CalEEMod analysis conducted for the Modified Project are shown in Table 2. As shown, construction of the Modified Project would generate an estimated 1,346 MT of CO₂e during Phase I and Phase II construction activities, an increase of 30 MT of CO₂e when compared to the emissions from Phase I and Phase II of the Original Project. Following the SCAQMD's recommended methodology for amortizing construction emissions over a 30-year period (the assumed life of the Project), construction of the Modified Project would generate an estimated 45 MT CO₂e per year, which is 1 MT CO₂e per year higher than construction of the Original Project.

Table 2 Estimated Construction Emissions of Greenhouse Gases

Year	Annual Emissions (MT CO ₂ e)
Construction Year 1 (Phase I)	841
Construction Year 2 (Phase II)	505
Total Construction Emissions	1,346
Amortized over 30 years	45 MT CO ₂ e per year

See Appendix A for CalEEMod results.

Total annual construction and operational emissions from the Modified Project would be 5,939 MT CO₂e per year, which is 1 MT CO₂e greater than construction and operational emissions from the Original Project. As with the Original Project, these amortized GHG emissions from the Modified Project would exceed SCAQMD's threshold of 3,000 MT CO₂e per year per project, and would therefore conflict with AB 32 and SB 32, resulting in a significant and unavoidable impact. This impact would be the same as described for the Original Project, and would be cumulatively considerable. The significant impact is not new or substantially more severe, as the increase in emissions is nominal.

3.8 Hazards and Hazardous Materials

The Modified Project and the Original Project are located on the same Phase II site, cover the same area, and would implement the same land uses. Addition of concrete slope protection for bank stabilization and three access ramps to the northern WWRSC embankment under the Modified Project would temporarily increase the transport and use of hazardous materials in the area through the operation of construction vehicles and equipment beyond those considered as part of the Original Project. However, risk due to transport and use of hazardous materials would be reduced or avoided by Mitigation Measures HAZ-1(a) and HAZ-1(b), which require implementation of a Hazardous Materials Management and Spill Control Plan (HMMSCP) and a Hazardous Materials Business Plan (HMBP), respectively. In addition, all equipment will be removed from the WWRSC at the end of each work day, and would be stored in designated areas within the WRP10 site. Therefore, as with the Original Project, impacts related to the potential for release of hazardous materials during construction would be reduced to a less than significant level with implementation of mitigation measures. To ensure that emergency access and evacuation routes are maintained through project implementation, Mitigation Measure HAZ-4 would also be implemented, as analyzed in the Original Project. This would reduce risk of impairment to an emergency response plan to a less than significant level. No new or substantially more severe significant impacts associated with hazardous wastes and materials would occur as a result of the Modified Project.

3.9 Hydrology and Water Quality

The Modified Project would apply concrete slope protection for bank stabilization and three access ramps to the northern WWRSC embankment, and place the MVP Extension within the northern embankment, as shown in Figure 1. As described under “Modified Project Description” in Section 2, the Modified Project would apply approximately 4,400 cubic yards of concrete to complete construction of slope protection, access ramps, and low-flow weir structures (Stantec 2019b). Hydraulic analyses conducted for the Modified Project indicate the addition of the proposed slope lining would maintain hydraulic characteristics of the channel consistent with the Original Project. The presence of the proposed slope lining would generally cause slight decreases in channel depths with corresponding minor increases in flow velocity, which would be accommodated by the proposed freeboard. The four-foot freeboard is also sufficient to provide the WRP10 facility with protection from stormwater flows associated with the 100-year storm event (Stantec 2019a, 2019b, 2019c).

Under pre-project conditions, flow events in the WWRSC occur either as dry-weather flow, local stormwater flow tributary to local storm drains, or regional stormwater flows. Compared to pre-project conditions, dry-weather flow would continue to happen under post-project conditions. For local storm events, infiltration and/or the continuation of flow downstream of the Phase II site would continue to occur under post-Project conditions. For regional storm flows, erosion of the berms within the WWRSC would provide for the continuation of flows to downstream of the Phase II site (Stantec 2019b).

Additional impervious features would be included as part of Phase II of the Modified Project due to WWRSC concrete slope protection for bank stabilization. This could increase stormwater runoff; however, stormwater runoff would be collected within the channel, as with the Original Project. Hydraulic analyses conducted for the Modified Project indicate the addition of the proposed slope lining would maintain hydraulic characteristics of the channel consistent with the Original Project.

The presence of the proposed slope lining would generally cause slight decreases in channel depths with corresponding minor increases in flow velocity, which would be accommodated by the proposed freeboard. The four-foot freeboard is also sufficient to provide the WRP10 facility with protection from stormwater flows associated with the 100-year storm event (Stantec 2019a, 2019b, 2019c). Therefore, channel lining would not impair function of the channel for stormwater conveyance and the additional impervious surface would not require the expansion of existing stormwater drainage facilities.

During construction, risk of erosion and discharge from equipment leaks would also increase in the Modified Project with additional construction equipment required for WWRSC embankment reinforcement in Phase II. As analyzed in the certified EIR, Stormwater Pollution Prevention Plans (SWPPPs) with Best Management Practices (BMPs) would be prepared for Phases I and II, reducing these impacts to a less than significant level. Water demand during Phase II would be increased from the Original Project due to additional construction activities for concrete placement; however, as noted in the EIR, the site has sufficient water supplies to meet existing demand and this would not substantially deplete groundwater supplies or interfere with groundwater recharge. Impacts to groundwater resources would be less than significant.

As described herein, the Modified Project is specific to a portion of the Phase II site and activities. Other portions of the Modified Project would be the same as described for the Original Project, including with respect to water quality impacts associated with replenishing the local groundwater basin with imported Colorado River water delivered to the WRP10 site via the realigned MVP Extension. As with the Original Project, Mitigation Measure HYD-1 would be applied for the Modified Project, to address potential impacts to groundwater quality.

Potential impacts to hydrology and water quality would be the same as described in the EIR for the Original Project. No new or substantially more severe significant impacts associated with hydrology and water quality would occur as a result of the Modified Project.

3.10 Land Use and Planning

The Modified Project and the Original Project are located on the same site, and would implement the same land use. The portion of the WWRSC affected under Phase II would continue to provide stormwater conveyance under both the Modified Project and the Original Project.

No impact would occur for land use and planning. No new or substantially more severe significant impacts associated with land use and planning would occur as a result of the Modified Project.

3.11 Mineral Resources

The Modified Project remains within the same footprint and with the same features as analyzed in the EIR, with the addition of concrete slope protection for bank stabilization and three concrete ramps to the northern WWRSC embankment and relocation of the MVP Extension within the northern embankment. As noted in the EIR, there are no mines, aggregate pits or quarries within the Project site, and California Geological Survey (2007) mapping identifies the entire Project site and surrounding vicinity as having little likelihood for the presence of significant mineral deposits. Known mineral resources of value are not present or likely to be present, or are precluded by existing uses if present, on the Project site.

As with the Original Project, no impact to mineral resources would occur as a result of the Modified Project. No new or substantially more severe significant impacts associated with mineral resources would occur as a result of the Modified Project.

3.12 Noise and Vibration

The placement of bank stabilization to reinforce the northern WWRSC embankment under the Modified Project would require the use of additional, yet temporary, construction trucks and equipment on the Project site, which would introduce temporarily elevated noise and vibration in the immediate area during the construction phase. This minor increase of vehicles and equipment is not expected to increase noise levels beyond the Caltrans thresholds for intermittent sources at new residential structures, modern industrial, and commercial buildings (0.50 in/sec peak particle velocity [PPV]), which are the same standards used in the EIR. As described in the EIR, the thresholds for frequent events are considered appropriate because of the scale and duration of proposed construction activity; in addition, this analysis applies thresholds for intermittent sources in the Caltrans (2013) *Transportation and Construction Vibration Guidance Manual* for potential damage to buildings, where Caltrans considers the architectural damage risk level to be between 0.08 and 0.5 in/sec PPV, depending on the type of building that is affected (Caltrans 2013). Consistent with the Original Project, construction hours would be limited to the allowable construction hours listed under Palm Desert City Code Section 9.24.070 and, as with the Original Project, standard noise-related BMPs would be implemented; standard noise-related BMPs may include but would not be limited to: all construction equipment, fixed or mobile, to be equipped with properly operating and maintained mufflers, consistent with manufacturers' standards; locate all stationary construction equipment so that emitted noise is directed away from the noise-sensitive receptors nearest the project site; limit haul truck deliveries to the same hours specified for construction equipment, and require truck trips be limited to the hours of construction activity.

Construction activities would not cause a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the Modified Project, and therefore would be less than significant. Additionally, no increase in construction equipment known to cause perceptible vibrations other than loaded concrete trucks would occur under the Modified Project. Potential impacts to noise and vibration would be the same as described in the EIR for the Original Project. No new or substantially more severe significant impacts associated with noise and vibration would occur as a result of the Modified Project.

3.13 Population and Housing

The Modified Project remains within the same footprint and with the same project features as analyzed in the EIR, with the addition of concrete slope protection for bank stabilization and three access ramps. As analyzed in the Original Project, no houses, residential structures, or dwellings are located within the Project site. Neither the Original Project nor the Modified Project would displace any existing housing or result in impacts to housing.

Construction of the Modified Project would include construction activities not previously included in the Original Project, for placement of concrete slope protection for bank stabilization on the northern WWRSC embankment; these additional construction activities may require an additional worker crew. Construction crews would be drawn from the existing regional work force. As such, neither the Modified Project nor the Original Project would result in adverse impacts to population,

housing, or employment. No new or substantially more severe significant impacts associated with population and housing would occur as a result of the Modified Project.

3.14 Public Services

The Modified Project remains within the same footprint and with the same project features as analyzed in the EIR. The Modified Project and the Original Project are located on the same site and would implement the same land uses. As analyzed in the Original Project, the Modified Project would not substantially increase the demand for police, fire, and school services in the Project area because existing public services are sufficient to serve potential needs during construction and operation, including as related to police and fire services. Also, similar to the Original Project, neither construction nor operation of the Modified Project would affect school services, because neither the Original Project nor Modified Project would introduce new or expanded population requiring school services or physically alter or otherwise affect existing schools. Similar to the Original Project, no impact to public services would occur as a result of the Modified Project.

3.15 Recreation

There are no recreation resources or opportunities on the Project site. The Modified Project would not remove or otherwise alter access to or availability of recreational resources or opportunities. No impact would occur.

3.16 Transportation and Traffic

During construction of the Modified Project, concrete trucks would be required to transport materials to the site for application of concrete slope protection for bank stabilization and three concrete ramps on the northern WWRSC embankment. Concrete would be sourced from a local vendor and such trips would only occur during the construction period. The air quality modeling described in Section 3.3 of this Addendum was updated to reflect concrete truck trips associated with transportation of approximately 4,400 cubic yards of concrete to the Project site for the application of concrete slope protection; for the purposes of this analysis, it was assumed that concrete would be sourced from within approximately 10 miles of the Project site, and that up to 489 one-way truck trips would be required. These truck trips would be isolated to the Modified Project's construction period and, as with the Original Project, Mitigation Measure TRA-1 would be implemented for the Modified Project, requiring the preparation and implementation of a Construction Traffic Management Plan. The implementation of a Construction Traffic Management Plan as required under Mitigation Measure TRA-1 would reduce potential impacts of the Modified Project to a less-than-significant level.

In addition, due to placement of the MVP Extension within the reinforced northern WWRSC embankment rather than in the bed of the WWRSC, as proposed under the Original Project, the Modified Project would not need to backfill the MVP Extension trench with concrete slurry material, and trucks used for the transport of concrete slurry material would not be required for the Modified Project. As a result, concrete truck trips associated with construction of the Modified Project may be comparable to the Original Project, with respect to transportation and traffic. However, to be conservative for the purposes of quantifying air quality emissions under the Modified Project (as discussed in Section 3.3), it was assumed that the Modified Project would result in a net increase in concrete trucks, when compared to the Original Project, traveling to and from the Project site

during the temporary construction period. This assumed increase in construction-period trucks for the Modified Project would increase the potential for impacts to traffic and transportation to occur, such as temporary traffic constriction during the construction period.

As described above, due to the temporary nature of concrete truck trips, and the implementation of a Construction Traffic Management Plan under Mitigation Measure TRA-1, potential impacts to transportation and traffic would be less than significant. No new or substantially more severe significant impacts associated with transportation and traffic would occur as a result of the Modified Project.

3.17 Utilities and Service Systems

The Modified Project remains within the same footprint and with the same features as analyzed in the EIR, with the addition of concrete slope protection for bank stabilization and three concrete ramps to the northern WWRSC embankment, as well as relocation of the MVP Extension within the northern embankment. Potential impacts to utilities and service systems include the generation of wastewater, need for a water supply, and need for solid waste disposal services. As analyzed in the EIR, an SWPPP with BMPs for Phase II would be prepared, thereby minimizing and avoiding potential impacts to utilities and service systems from stormwater flows, including the potential for erosion and sedimentation to occur. In addition, potential impacts related to landfill capacity and compliance related to solid waste statutes and regulations, as well as cumulative impacts related to water supply for construction, would be consistent with the Original Project. Thus, no new impacts related to utilities and service systems would result from implementation of the Modified Project. Potential impacts to utilities and service systems would remain less than significant, and no new or substantially more severe significant impacts associated with utilities and service systems would occur as a result of the Modified Project.

3.18 Other CEQA Mandated Topics

The EIR discussed growth-inducing impacts, irreversible environmental impacts, and energy impacts of the Original Project. Because the Modified Project remains within the same footprint as the Original Project, and is limited to minor alterations in project features including concrete reinforcement, concrete ramps and relocation of the MVP Extension, potential growth-inducing impacts and irreversible environmental impacts will remain the same as for the Original Project. During construction, energy impacts would be slightly increased in comparison to the Original Project, as the Modified Project would require additional heavy truck trips for concrete import and paving equipment to construct the bank stabilization.

Wildfire is a CEQA resource not anticipated to be significantly affected by the Original or Modified Project. The Project does not involve an impairment to emergency response with the implementation of the construction transportation plan mitigation measure (TRA-1), increase or exacerbate an increase in wildfire threats, or create exposure to threats from wildfire such as post wildfire flooding. The site is located in a stormwater channel void of wildfire fuels, and the project would not contribute to an increase in wildfire.

As stated in the EIR, construction and operation of the project would not introduce potentially flammable activities in fire-prone areas. CAL FIRE has identified the project area as located within the "Non-Very High Fire Hazard Severity Zone" in the Local Responsibility Area for incorporated cities which indicates the site is not subject to wildfire hazards; and no impact would occur.

Implementation of the Modified Project would occur within the same footprint; and there, no impact would occur.

The CalEEMod computer modeling platform was used to quantify direct air emissions from construction and operation activities (including vehicle use), as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use of the Modified Project. Further, the model identified mitigation measures to reduce criteria pollutant and GHG emissions along with calculating the benefits achieved from measures chosen by the user.

As described in Section 3.7 *Greenhouse Gas Emissions*, the Modified Project and Original Project would result in increased weekday trips compared to current activities on the Project site due to construction and its associated energy use; both the Original Project and the Modified Project would result in a significant and unavoidable impact due to GHG emissions. However, construction activities of the Modified Project and the Original Project would make a minimal contribution to statewide energy consumption due to temporary duration of construction activities, and therefore would not adversely affect statewide energy supplies. Complete CalEEMod results and assumptions are provided as Appendix A of this EIR.

4 Conclusion

Acting as the CEQA Lead Agency, and through review of the Palm Desert Groundwater Replenishment Facility Project materials and supporting documents describing the proposed Modified Project, CVWD has determined that neither a Subsequent nor Supplemental CEQA documentation is required (State CEQA Guidelines Section 15162). This Addendum to the EIR provides the necessary information for the approval of the Modified Project. In accordance with CEQA (State CEQA Guidelines Section 15162), the Addendum need not be circulated for public review.

Based on the foregoing analysis, the proposed minor changes to the Original Project are determined to be consistent with the description of the environmental setting, environmental impacts, and mitigation measures as set forth in the certified Palm Desert Groundwater Replenishment Facility Project Final EIR (2018). The Modified Project would remain subject to all mitigation measures included in the EIR and the Mitigation Monitoring and Reporting Plan remains applicable to the Modified Project.

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