



Final Initial Study and Mitigated Negative Declaration
EAST COACHELLA VALLEY WATER SUPPLY PROJECT

SAINT ANTHONY MOBILE HOME PARK
WATER CONSOLIDATION PROJECT

SCH #2019079089

Coachella Valley Water District

September 2019

PREPARED BY:





Final Initial Study and Mitigated Negative Declaration

East Coachella Valley Water Supply Project

Saint Anthony Mobile Home Park Water Consolidation Project

State Clearinghouse # 2019079089

Prepared for:

Coachella Valley Water District
P.O. Box 1058
Coachella, CA 92236

Prepared by:



10509 Vista Sorrento Parkway, Suite 205
San Diego, CA 92121
858.875.7405

woodardcurran.com

COMMITMENT & INTEGRITY DRIVE RESULTS

**0011079.00
Coachella Valley
Water District
September 2019**

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Acronym List

BMPs	Best Management Practices
Caltrans	California Department of Transportation
CEQA	California Environmental Quality Act
CDFW	California Department of Fish and Wildlife
CDP	Criterion Decision Plus
CFR	Code of Federal Regulations
CVMSHCP	Coachella Valley Multiple Species Habitat Conservation Plan
CVWD	Coachella Valley Water District
CWA	Clean Water Act
DAC	Disadvantaged Community
DEH	Riverside County Department of Environmental Health
DIP	Ductile Iron Pipe
DWSRF	Drinking Water State Revolving Fund
ECVWSP	East Coachella Valley Water Supply Project
EIR	Environmental Impact Report
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
gpm	gallons per minute
Hp	Horsepower
HCP	Habitat Conservation Plan
IS/MND	Initial Study/Mitigated Negative Declaration
MCL	Maximum contaminant level
MTCO _{2e}	Metric Tons Carbon Dioxide Equivalent
MBTA	Migratory Bird Treaty Act
MMRP	Mitigation Monitoring and Reporting Plan
MHP	Mobile Home Park
NHPA	National Historic Preservation Act
NPDES	National Pollutant Discharge Elimination System
O&M	Operations and Maintenance
RAA	Running annual average
RO	Reverse Osmosis
RWQCB	Regional Water Quality Control Board

SWRCB State Water Resources Control Board
SWS Small Water System
USDA US Department of Agriculture
USEPA US Environmental Protection Agency
USFWS US Fish and Wildlife Service

1. INTRODUCTION

1.1 Purpose of this Document

Coachella Valley Water District (CVWD) has prepared this Initial Study (IS) to evaluate the potential environmental impacts related to implementation of the Saint Anthony Mobile Home Park (MHP) Water Consolidation Project (the “proposed project” or “proposed action”), which consists of consolidation of three independent small water systems (SWS) into CVWD’s drinking water system. In 2018, an evaluation of water consolidation opportunities for disadvantaged communities (DACs) in CVWD’s eastern service area was conducted as part of the East Coachella Valley Water Supply Project (ECVWSP). The proposed project is one of two highest ranked consolidation projects assessed in the ECVWSP.

CVWD is the lead agency under the California Environmental Quality Act (CEQA) for the proposed project. CEQA requires that the lead agency prepare an Initial Study (IS) to determine whether an Environmental Impact Report (EIR), Negative Declaration (ND), or Mitigated Negative Declaration (MND) is needed. CVWD has prepared this IS to evaluate the potential environmental consequences associated with the Saint Anthony MHP Water Consolidation Project, and to disclose to the public and decision makers the potential environmental effects of the proposed project. Based on the analysis presented herein, an MND is the appropriate level of environmental documentation for the proposed project.

1.2 Scope of this Document

This IS/MND has been prepared in accordance with CEQA (as amended) (Public Resources Code §§21000 et. seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3, §§15000 et. seq.), as updated on December 28, 2018. CEQA Guidelines §15063 describes the requirements for an IS and §§15070-15075 describe the process for the preparation of an MND. Where appropriate, this document makes reference to either the CEQA Statute or State CEQA Guidelines (as amended in December 2018). This IS/MND contains all of the contents required by CEQA, which includes a project description, a description of the environmental setting, potential environmental impacts, mitigation measures for any significant effects, consistency with plans and policies, and names of preparers.

This IS/MND evaluates the potential for environmental impacts to resource areas identified in Appendix G of the State CEQA Guidelines (as amended in December 2018). The environmental resource areas analyzed in this document include:

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

The proposed project may receive funding under the Drinking Water State Revolving Fund (DWSRF), which is administered by the State Water Resources Control Board (SWRCB) via funds from US Environmental Protection Agency (USEPA) and/or the US Department of Agriculture (USDA) Rural Development Program. Therefore, to support

compliance with the federal environmental review requirements of the funding programs, this document includes analysis pertinent to several federal regulations (also referred to as federal cross-cutters or CEQA-Plus). Guidelines for complying with cross-cutting federal authorities can be found in the DWSRF regulations at 40 Code of Federal Regulations (CFR) §35.3575 and the USDA Environmental Policies and Procedures at 7 CFR §1970.

The federal cross-cutters analyzed in this document include:

- Environmental Alternative Analysis
- Archaeological and Historic Preservation Act (AHPA)
- Clean Air Act
- Coastal Zone Management Act
- Endangered Species Act (ESA)
- Environmental Justice
- Farmland Protection Policy Act
- Fish and Wildlife Coordination Act (FWCA)
- Floodplain Management: Executive Orders 11988, 12148, and 13690
- Magnuson-Stevens Fishery Conservation and Management Act
- Migratory Bird Treaty Act
- National Historic Preservation Act (NHPA)
- Protection of Wetlands
- Rivers and Harbors Act, Section 10
- Safe Drinking Water Act, Sole Source Aquifer Protection
- Wild and Scenic Rivers Act

1.3 CEQA Process

In accordance with CEQA Guidelines §15073, the Draft IS/MND was circulated for a 30-day public review period (July 25, 2019 – August 23, 2019) to local and state agencies, and to interested organizations and individuals who may have wished to review and comment on the report. CVWD circulated the Draft IS/MND to the State Clearinghouse for distribution to State agencies. In addition, CVWD circulated a Notice of Intent to Adopt a Mitigated Negative Declaration to the Riverside County Clerk, responsible agencies, and interested entities. A copy of the Draft IS/MND was available for review at: www.cvwd.org.

Written comments were to be submitted to CVWD by 5:00 PM on August 23, 2019 and addressed to:

Elizabeth Meyerhoff, Environmental Specialist
Coachella Valley Water District
75515 Hovley Lane East
Palm Desert, CA 92211

Following the 30-day public review period, CVWD evaluated written comments and telephone calls received on the Draft IS/MND and incorporated any substantial evidence that the proposed project could have a significant impact on the environment into this Final IS/MND and prepared a Mitigation Monitoring and Reporting Program (MMRP).

CVWD's Board of Directors will consider adopting the Final IS/MND and MMRP in compliance with CEQA at a publicly noticed meeting, planned for September 24, 2019.

1.4 Impact Terminology

The scope of the environmental resource areas is listed above in *Section 1.2*. The level of significance for each resource area uses CEQA terminology as specified below:

- **No Impact.** No adverse environmental consequences have been identified for the resource or the consequences are negligible or undetectable.

- **Less than Significant Impact.** Potential adverse environmental consequences have been identified. However, they are not adverse enough to meet the significance threshold criteria for that resource. No mitigation measures are required.
- **Less than Significant with Mitigation Incorporated.** Adverse environmental consequences that have the potential to be significant but can be reduced to less than significant levels through the application of identified mitigation strategies that have not already been incorporated into the proposed project.
- **Potentially Significant.** Adverse environmental consequences that have the potential to be significant according to the threshold criteria identified for the resource, even after mitigation strategies are applied and/or an adverse effect that could be significant and for which no mitigation has been identified. If any potentially significant impacts are identified, an Environmental Impact Report (EIR) must be prepared to meet the requirements of CEQA.

1.5 Mitigation Monitoring and Reporting Program

Table 1-1 provides a summary of potential impacts and proposed mitigation measures by resource area. Pursuant to State CEQA Guidelines §§15097 and 15126.4, the following mitigation measures have been incorporated into the project design and would be implemented before or during construction in accordance with the project; thereby, reducing all identified potential environmental impacts to a less than significant level.

The table does not include impacts or criteria that were deemed No Impact or Less than Significant due to actions associated with the Saint Anthony MHP Water Consolidation Project; rather, the table focuses on potentially significant impacts and associated mitigation measures.

Table 1-1: Mitigation Monitoring and Reporting Program for Saint Anthony Project

Mitigation Measure	Monitoring and Reporting Actions	Implementation Schedule	Monitoring Frequency	Responsible Party	Review and Approval by:	Verification: Status/ Date Completed/ Initials
<p>Mitigation Measure BIO-1: Roosting Bats Impact Avoidance and Minimization</p> <p>To avoid disturbance of roosting bats, which are a CDFW Species of Special Concern, CVWD shall, at least two weeks prior to, but not more than 30 days prior to, the start of construction, contract with a qualified biologist to conduct a pre-construction survey for roosting bats. The survey shall include all trees, bridges, and structures suitable for roosting by the western yellow bat and western mastiff bat. The pre-construction survey shall be conducted within the disturbance footprint and a 100-foot buffer with inaccessible areas (i.e. private lands) surveyed with binoculars, as feasible.</p> <p>If active bat roosts are present onsite, a buffer zone of 100 feet shall be established around the roosts that excludes construction activities or other disturbances. Tree removal activities shall occur only during periods when bats are not roosting in those trees proposed to be removed, as determined by a qualified biologist. If active maternity roosts or non-breeding bat hibernacula are found in trees scheduled to be removed, removal activities will be conducted during a season when young are not present.</p>	<ol style="list-style-type: none"> 1. Include measure in contract documents 2. Confirm qualified biologist conducts pre-construction survey for roosting bats and established no-work buffer zone, as appropriate. 3. Avoid tree removal and construction activities in buffer zone of roosting bats. Avoid tree removal when bats are nesting and/or young are present. 	<ol style="list-style-type: none"> 1. Contracting 2. Pre-Construction 3. Construction 	<ol style="list-style-type: none"> 1. Once 2. Once, prior to construction, or if construction re-starts 3. Continuously throughout construction, if applicable 	<ol style="list-style-type: none"> 1. CVWD 2. CVWD, Construction Contractor 3. Construction Contractor 	CVWD	<ol style="list-style-type: none"> 1. _____ 2. _____ 3. _____
<p>Mitigation Measure BIO-2: Pre-Construction Burrowing Owl Surveys</p> <p>To avoid potential impacts to burrowing owl, a pre-construction clearance survey for burrowing owl shall be conducted no more than fourteen (14) days prior to initiation of construction activities. The burrowing owl pre-construction survey shall be conducted on-foot within the proposed disturbance area including a 500-foot buffer. The survey methods will be consistent with the <i>Staff Report on Burrowing Owl Mitigation</i> (CDFW 2012) and shall consist of walking parallel transects spaced adequately to obtain 100% visual coverage of the site. The survey shall be conducted by a biologist familiar with the identification of burrowing owl and their habitat.</p> <p>If burrowing owls are found within the Study Area during the pre-construction surveys, active burrows will be avoided. If possible, the timing and location of construction activities will be adjusted to avoid the occupied burrow by the appropriate distance (see below), where possible. Due to the size of the project, it is anticipated that the construction schedule and location can be modified to avoid all potential impacts to occupied burrows during the breeding season. Buffer zones for occupied burrows will be established at 500 feet during the breeding season (February 1 to August 31) and at 100 feet for the non-breeding season. These buffers may be adjusted in consultation with California Department of Fish and Wildlife and Coachella Valley Conservation Commission and monitored at the discretion of a qualified biologist. The buffer zone will be clearly marked with flagging and/or construction fencing.</p>	<ol style="list-style-type: none"> 1. Include measure in contract documents. 2. Confirm qualified biologist conducted pre-construction survey for burrowing owl and established buffer zone, as appropriate. 3. Avoid construction within the buffer zone of active burrows. 	<ol style="list-style-type: none"> 1. Contracting 2. Pre-Construction 3. Construction 	<ol style="list-style-type: none"> 1. Once 2. Once, prior to construction, or if construction re-starts 3. Continuously throughout construction, if applicable 	<ol style="list-style-type: none"> 1. CVWD 2. CVWD, Construction Contractor 3. Construction Contractor 	CVWD	<ol style="list-style-type: none"> 1. _____ 2. _____ 3. _____
<p>Mitigation Measure BIO-3: Nesting Birds</p> <p>To avoid disturbance of nesting birds, including raptor species protected by the MBTA and CFGC 3503, activities related to the proposed project including, but not limited to, vegetation removal, ground disturbance, and construction shall occur outside of the bird breeding season (typically January 1 to September 15) to the extent practicable.</p> <p>If construction must occur within the bird breeding season (January 1 through September 15), CVWD shall, no more than three days prior to initiation of ground disturbance and/or vegetation removal, contract with a qualified biologist to conduct a nesting bird and raptor pre-construction survey within the disturbance footprint plus a 100-foot buffer (300-foot for raptors), where feasible. If the proposed project is phased or construction activities stop for more than one week, a subsequent pre-construction nesting bird and raptor survey will be required prior to each phase of construction within the project site.</p> <p>Pre-construction nesting bird and raptor surveys shall be conducted during the time of day when birds are active and shall factor in sufficient time to perform this survey adequately and completely. A report of the nesting bird and raptor survey</p>	<ol style="list-style-type: none"> 1. Include measure in contract documents. 2. Avoid construction activities between January 1 and September 15. <p>OR</p> <ol style="list-style-type: none"> 3. Confirm a qualified biologist conducted pre-construction nesting bird and raptor surveys and 	<ol style="list-style-type: none"> 1. Contracting 2. Construction <p>OR</p> <ol style="list-style-type: none"> 3. Pre-construction 	<ol style="list-style-type: none"> 1. Once 2. Once <p>OR</p> <ol style="list-style-type: none"> 3. Once, prior to construction, or if construction re-starts 	<ol style="list-style-type: none"> 1. CVWD 2. Construction Contractor <p>OR</p> <ol style="list-style-type: none"> 3. CVWD, Construction Contractor 	CVWD	<ol style="list-style-type: none"> 1. _____ 2. _____ <p>OR</p> <ol style="list-style-type: none"> 3. _____

Mitigation Measure	Monitoring and Reporting Actions	Implementation Schedule	Monitoring Frequency	Responsible Party	Review and Approval by:	Verification: Status/ Date Completed/ Initials
<p>results, if applicable, shall be submitted to the lead agency for review and approval prior to ground and/or vegetation disturbance activities.</p> <p>If nests are found, their locations shall be flagged. An appropriate avoidance buffer ranging in size from 25 to 50 feet for song birds, and up to 500 feet for raptors depending upon the species and the proposed work activity, shall be determined and demarcated by a qualified biologist with bright orange construction fencing or other suitable flagging. Buffers will be determined in conjunction with CDFW through the development of a nesting bird management plan. Active nests shall be monitored at a minimum of once per week until it has been determined that the nest is no longer being used by either the young or adults. No ground disturbance shall occur within this buffer until the qualified biologist confirms that the breeding/nesting is completed, and all the young have fledged. If project activities must occur within the buffer, they shall be conducted at the discretion of the qualified biologist. If no nesting birds are observed during pre-construction surveys, no further actions would be necessary.</p>	<p>established a no-work buffer zone, as appropriate.</p> <p>4. Confirm construction is avoided in the no-work buffer zone until biologist determines that the nest is inactive.</p>	<p>4. Construction</p>	<p>4. Continuously throughout construction, if applicable</p>	<p>4. Construction Contractor</p>		<p>4. _____</p>
<p>Mitigation Measure BIO-4: Frac-Out Prevention and Contingency Plan</p> <p>If HDD method of trenchless crossing of the Whitewater River/Coachella Valley Stormwater Channel is used, CVWD shall require its construction contractor to prepare a Frac-Out Prevention and Contingency Plan, prior to construction. At minimum, the plan shall prescribe the following measures to ensure protection of aquatic resources, special status plants, and wildlife:</p> <ul style="list-style-type: none"> • Verify recommended depth of the pipeline under the Whitewater River/Coachella Valley Stormwater Channel based on soil properties and risk for potential frac-out during HDD operation, • Procedures to minimize the potential for a frac-out associated with HDD; • Procedures for timely detection of frac-outs; • Procedures for timely response and remediation in the event a frac-out; and • Monitoring of drilling and frac-out response activities in jurisdictional areas by a qualified biologist. 	<p>1. Include measure in contract documents.</p> <p>2. Confirm construction contractor has prepared a Frac-Out Prevention and Contingency Plan.</p> <p>3. Confirm construction contractor follows procedures in Frac-Out Prevention and Contingency Plan.</p>	<p>1. Contracting</p> <p>2. Pre-Construction</p> <p>3. Construction</p>	<p>1. Once</p> <p>2. Once</p> <p>3. Continuously throughout construction</p>	<p>1. CVWD</p> <p>2. CVWD, Construction Contractor</p> <p>3. Construction Contractor</p>	<p>CVWD</p>	<p>1. _____</p> <p>2. _____</p> <p>3. _____</p>
<p>Mitigation Measure BIO-5: CVMSHCP Surveys</p> <p>Prior to construction, CVWD will coordinate with Coachella Valley Association of Governments (CVAG) or Coachella Valley Conservation Commission (CVCC) on specific burrowing owl and Crissal Thrasher survey requirements of Section 4.4 of the CVMSHCP that should be implemented for the portion of Seferino Huerta MHP located within the <i>Coachella Valley Stormwater Channel and Delta Conservation Area</i>. CVWD will implement any surveys determined to be required by CVAG or the CVCC to ensure compliance with the CVMSHCP.</p>	<p>1. Coordinate with CVAG or CVCC on CVMSHCP survey requirements for Seferino Huerta MHP.</p> <p>2. Conduct necessary CVMHSPC surveys, as needed.</p>	<p>1. Pre-construction</p> <p>2. Construction</p>	<p>1. Once</p> <p>2. Likely once prior to construction</p>	<p>1. CVWD</p> <p>2. CVWD, Construction Contractor</p>	<p>CVWD</p>	<p>1. _____</p> <p>2. _____</p>
<p>Mitigation Measure CUL-1: Initial Monitoring of Archaeological Resources</p> <p>CVWD shall ensure that initial project-related ground-disturbing activities shall be observed by an archaeological and Native American monitor. The archaeological monitor shall be under the direction of a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for prehistoric archaeology (National Park Service 1983). If archaeological resources are encountered during ground-disturbing activities, work in the immediate area shall halt and the find shall be evaluated for CRHR and/or NRHP eligibility. Archaeological monitoring may be reduced or halted at the discretion of the qualified archaeologist as warranted by conditions such as encountering bedrock, sediments being excavated are fill materials, or negative findings during initial ground-disturbing activities. If monitoring is reduced, spot-checking shall occur when ground-disturbance moves to a new location or when ground disturbance will extend to depths not previously reached (unless those depths are within bedrock). Both the project archeologist and Native American monitor will be invited to attend the pre-construction meeting. The project archeologist and Native American monitor will provide a brief orientation to construction crews on the first day of construction.</p>	<p>1. Include measure in contract documents.</p> <p>2. Confirm project archaeologist and Native American monitor provide brief orientation to construction crews on first day of construction.</p> <p>3. Confirm archaeological and Native American monitor</p>	<p>1. Contracting</p> <p>2. Construction</p> <p>3. Construction</p>	<p>1. Once</p> <p>2. Once</p> <p>3. Continuously throughout initial</p>	<p>1. CVWD</p> <p>2. CVWD, Construction Contractor</p> <p>3 CVWD, Construction</p>	<p>CVWD</p>	<p>1. _____</p> <p>2. _____</p> <p>3. _____</p>

Mitigation Measure	Monitoring and Reporting Actions	Implementation Schedule	Monitoring Frequency	Responsible Party	Review and Approval by:	Verification: Status/ Date Completed/ Initials
	<p>observe initial ground-disturbing activities.</p> <p>4. If resources are encountered during construction, confirm work halted and qualified archaeologist was consulted on eligibility, if applicable.</p>	4. Construction	<p>ground-disturbing activities.</p> <p>4. Throughout construction, if applicable.</p>	<p>Contractor</p> <p>4. Construction Contractor</p>		4. _____
<p>Mitigation Measure CUL-2: Unanticipated Discovery of Cultural Resources</p> <p>In the event that cultural resources are unearthed during project construction, the project archaeologist, in coordination with CVWD's Construction Inspector, shall temporarily suspend all earth disturbing work within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeologist, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:</p> <ul style="list-style-type: none"> • If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately, and no agency notifications are required. • If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, he or she shall immediately notify CVWD's Construction Inspector and Environmental Services Department. CVWD shall consult on a finding of eligibility and implement appropriate treatment measures if the find is determined to be eligible for inclusion in the NRHP or CRHR. Work may not resume within the no-work radius until CVWD, through consultation as appropriate, determines that the site either: 1) is not eligible for the NRHP or CRHR; or 2) that the treatment measures have been completed to its satisfaction. 	<p>1. Include measures in contract documents.</p> <p>2. If resources are unearthed during construction, confirm work halted, qualified archaeologist was consulted on eligibility, and appropriate treatment measures and no-work buffers were implemented.</p> <p>3. Consult on finding and implement treatment measures, if applicable.</p>	<p>1. Contracting</p> <p>2. Construction</p> <p>3. Construction</p>	<p>1. Once</p> <p>2. Throughout construction, if applicable.</p> <p>3. Once</p>	<p>1. CVWD</p> <p>2. CVWD, Construction Contractor</p> <p>3. CVWD</p>	CVWD	<p>1. _____</p> <p>2. _____</p> <p>3. _____</p>
<p>Mitigation Measure CUL-3: Unanticipated Discovery of Human Remains</p> <p>The discovery of human remains is always a possibility during ground-disturbing activities. In the event that human remains are found, CVWD shall temporarily suspend all earth disturbing work within a 100-foot radius of the discovery. The project archeologist would evaluate the significance of the find and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find.</p> <p>If the find includes human remains, or remains that are potentially human, the professional archaeologist shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641). The archaeologist shall notify the Riverside County Coroner (as per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California PRC, and AB 2641 will be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (§ 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (§ 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate information center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.</p>	<p>1. Include measure in contract documents.</p> <p>2. Suspend all earth disturbing work within 100 feet of discovery, if applicable.</p> <p>3. Confirm appropriate notifications have occurred, if applicable.</p> <p>4. Verify adequate consultation with MLD has occurred, if applicable.</p> <p>5. Verify reburial site has been appropriately recorded and human remains treated appropriately, if applicable.</p>	<p>1. Contracting</p> <p>2. Construction</p> <p>3. Construction</p> <p>4. Construction</p> <p>5. Construction</p>	<p>1. Once</p> <p>2. Throughout construction</p> <p>3. Once</p> <p>4. Once</p> <p>5. Once</p>	<p>1. CVWD</p> <p>2. Construction Contractor</p> <p>3. CVWD</p> <p>4. CVWD</p> <p>5. CVWD</p>	CVWD,	<p>1. _____</p> <p>2. _____</p> <p>3. _____</p> <p>4. _____</p> <p>5. _____</p>

Mitigation Measure	Monitoring and Reporting Actions	Implementation Schedule	Monitoring Frequency	Responsible Party	Review and Approval by:	Verification: Status/ Date Completed/ Initials
<p>Mitigation Measure HAZ-1: Hazardous Materials Management and Spill Control Plan</p> <p>Prior to construction, the construction contractor is required to submit to CVWD a Hazardous Materials Management Spill Control Plan that includes a project-specific contingency plan for hazardous materials and waste operations. The plan shall be applicable to construction activities and shall establish policies and procedures according to applicable codes and regulations, including but not limited to the California Building and Fire Codes, and federal and California Occupational Safety and Health Administration (OSHA) regulations. Elements of the Plan shall include, but not be limited to the following:</p> <ul style="list-style-type: none"> • A discussion of hazardous materials management, including delineation of hazardous material storage areas, access and egress routes, waterways, emergency assembly areas, and temporary hazardous waste storage areas; • Notification and documentation of procedures; and • Spill control and countermeasures, including employee spill prevention/response training. 	<ol style="list-style-type: none"> 1. Include measure in contract documents. 2. Confirm construction contractor has prepared a Hazardous Materials Management and Spill Control Plan. 3. Confirm construction contractor follows procedures in the Hazardous Materials Management and Spill Control Plan. 	<ol style="list-style-type: none"> 1. Contracting 2. Pre-Construction 3. Construction 	<ol style="list-style-type: none"> 1. Once 2. Once. 3. Periodically throughout construction 	<ol style="list-style-type: none"> 1. CVWD, 2. Construction Contractor 3. Construction Contractor 	CVWD	<ol style="list-style-type: none"> 1. _____ 2. _____ 3. _____
<p>Mitigation Measure TRA-1: Traffic Control Plan</p> <p>Prior to construction, CVWD shall require its construction contractor to implement an approved Traffic Control Plan, to the satisfaction of the CVWD construction inspector and the County. The components of the Traffic Control Plan shall include:</p> <ul style="list-style-type: none"> • Identification of construction staging site locations and potential road closures, • Alternate routes of traffic detours, including emergency response contact information, • Planned routes for construction-related vehicle traffic (haul routes), and • Identification of alternative safe routes to maintain pedestrian safety during construction. <p>CVWD's Project Manager shall coordinate with the police, fire, and other emergency services to alert these entities about potential construction delays, project alignment, and construction schedule. CVWD shall minimize the duration of disruptions/closures to roadways and critical access points for emergency services. The Traffic Control Plan shall provide for traffic control measures including flag persons, warning signs, lights, barricades, and cones to provide safe passage of vehicular, bicycle and pedestrian traffic and access by emergency responders. The Traffic Control Plan shall be submitted to CVWD's Project Manager and construction inspector for review and approval prior to construction.</p> <p>CVWD's construction inspector shall have the construction schedule and Traffic Control Plan reviewed by the County of Riverside to ensure construction of the proposed project does not conflict with construction activities associated with other construction projects that may be occurring at the same time in the vicinity.</p>	<ol style="list-style-type: none"> 1. Include measure in contract documents 2. Confirm construction contractor has prepared a Traffic Control Plan to the satisfaction of the CVWD Construction Inspector and CVWD's Project Manager. 3. Confirm Project Manager has coordinated with emergency services about construction. 4. Confirm CVWD Construction Inspector has the Traffic Control Plan reviewed by the County of Riverside. 	<ol style="list-style-type: none"> 1. Contracting 2. Pre-Construction 3. Pre-Construction 4. Pre-Construction 	<ol style="list-style-type: none"> 1. Once 2. Once 3. Once 4. Once 	<ol style="list-style-type: none"> 1. CVWD 2. CVWD, Construction Contractor 3. CVWD Construction Inspector 4. CVWD Construction Inspector 	CVWD	<ol style="list-style-type: none"> 1. _____ 2. _____ 3. _____ 4. _____
<p>Mitigation Measure NOI-1: Noise and Vibration Control During Construction</p> <p>CVWD shall incorporate into the construction contract specifications the following noise and vibration control measures to be implemented by the construction contractor:</p> <ul style="list-style-type: none"> • Prior to construction, the Construction Contractor shall provide [CVWD-approved] written notification to residents within 500 feet of the proposed facilities undergoing construction shall be provided, identifying the type, duration, and frequency of 	<ol style="list-style-type: none"> 1. Confirm measures are incorporated into the contract specifications. 2. Send notices 	<ol style="list-style-type: none"> 1. Contracting 2. Pre-Construction 	<ol style="list-style-type: none"> 1. Once 2. Once 	<ol style="list-style-type: none"> 1. CVWD 2. Construction 	CVWD	<ol style="list-style-type: none"> 1. _____ 2. _____

Mitigation Measure	Monitoring and Reporting Actions	Implementation Schedule	Monitoring Frequency	Responsible Party	Review and Approval by:	Verification: Status/ Date Completed/ Initials
<p>construction activities. Notification materials shall be provided in English/Spanish translation and identify a mechanism for residents to contact CVWD's Project Manager related to r noise or vibration concerns.</p> <ul style="list-style-type: none"> • During construction, the Construction Contractor shall use equipment (e.g., jack hammers, pavement breakers, and rock drills) which is hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatically powered tools is unavoidable, an exhaust muffler on the compressed air exhaust would be used. This muffler can lower noise levels from the exhaust by up to 10 dBA. External jackets on the tools themselves would be used where feasible, and this could achieve a reduction of 5 dBA. Quieter procedures will be used such as drilling rather than impact equipment whenever feasible. • During construction, the Construction Contractor shall comply with compaction standards for backfill. Vibration generated during soil compaction may be minimized by using a small compactor. • During sheetpile driving for trench excavation, the Construction Contractor shall use the following measures: pushing the sheetpile in as far as possible with non-vibratory equipment (e.g., excavator) before using the vibrator; using a small, hand-operated vibratory hammer or one with a different operational frequency to further reduce the vibration potential; flooding the soils before tamping with the vibrator; and/or operating vibratory equipment with "throttling" when a vibrator must be used. • All equipment and trucks used by the Construction Contractor for project construction shall use the best available noise control techniques (including mufflers, use of intake silencers, ducts, engine enclosures and acoustically attenuating shields or shrouds) and be maintained in good operating condition to minimize construction noise impacts. All internal combustion engine-drive equipment shall be fitted with intake and exhaust mufflers which are in good condition. • During construction, the Construction Contractor shall prohibit unnecessary idling of internal combustion engines. In practice, this would mean turning off equipment if it would not be used for five or more minutes. • During construction, the Construction Contractor shall locate stationary noise-generating construction equipment, such as air compressors and generators, as far as possible from homes and businesses. • The Construction Contractor shall locate staging areas as far as feasibly possible from sensitive receptors. 	<p>3. Implement noise and vibration control measures.</p>	<p>3. Construction</p>	<p>3. Throughout construction</p>	<p>Contractor 3. Construction Contractor</p>	<p></p>	<p>3. _____</p>

2. PROJECT DESCRIPTION

2.1 Project Overview

The Saint Anthony MHP Water Consolidation Project consists of consolidation of three, independent small water systems (SWSs) into CVWD’s potable water system over several phases as shown in **Table 2-1**. Each SWS is shown in **Figure 2-1**. The proposed project alignment is approximately 27,000 feet in length and would be placed within or up to approximately 50 feet from the public right-of-way along Avenue 66 and Lincoln Street in unincorporated Riverside County.

Table 2-1: Saint Anthony MHP Water Consolidation Project Sites

Small Water System	Assessor’s Parcel Number (APN)	County Land Use Designation	Zoning Designation
Manuela Garcia Water	749-090-031	Indian Lands	A-1-10
Seferino Huerta	727-260-016	Very Low Density Residential	W-2
Saint Anthony MHP	727-271-018	Agriculture	W-2

Source: County of Riverside 2019

2.1.1 Project Background

CVWD is a potable water retailer that services a region covering approximately 1,000 square miles, mostly within the Coachella Valley in Riverside County, California; and has service area within Imperial and San Diego counties. In the East Coachella Valley region of its service area, there are a number of rural communities that are not connected to CVWD’s potable water system. These communities are all classified as disadvantaged communities (DACs) with median household incomes (MHIs) less than 80 percent of the California statewide MHI and depend on local private wells connected to independent SWSs to supply their drinking water. The local groundwater supplies of several of the SWSs have shown elevated concentrations of arsenic, fluoride and other constituents that are currently regulated by the State or may be in the near future (e.g., hexavalent chromium) according to Riverside County Department of Environmental Health (DEH) Inspection Reports.

To improve the reliability and potential safety of water supply and quality to the SWSs, CVWD is evaluating the consolidation of the SWSs into CVWD’s potable water system. The ECVWSP was initiated in early 2018 via a SWRCB planning grant to evaluate and prioritize the SWSs for potential consolidation, as well as develop preliminary engineering and environmental compliance documents for the highest priority systems. CVWD is partnering with its DAC Infrastructure Task Force¹ to implement the ECVWSP in coordination with other water and wastewater infrastructure projects in the East Coachella Valley.

The System Identification task of the ECVWSP addressed the SWSs identified for potential consolidation into the CVWD potable system; evaluated the current and projected water demand for each SWS; evaluated the infrastructure expansion and pump energy requirements to deliver the water; and evaluated the associated planning level capital and operations and maintenance (O&M) costs. The 83 SWSs identified for consolidation were grouped into 43 projects based on relative proximity of the SWSs. Four projects were then identified as suitable for grouping into a single regional project, bringing the total number of projects to 39. The projects were named based on the largest SWS each consolidation project would connect.

¹ The Disadvantaged Community Infrastructure Task Force is comprised of CVWD staff, CVWD Board members, non-profit organizations including Pueblo Unido Community Development Corporation, and DAC business owners and residents.

The findings from the System Identification task were then carried forward into the System Prioritization task to identify the top two consolidation projects to advance to develop preliminary engineering and environmental documents. The task evaluated and ranked the 39 water consolidation projects. The evaluation process included developing criteria for the projects, weighting the criteria, scoring the projects against each criterion, and ranking each project using a decision-making software (Criterion Decision Plus, or CDP) to then selecting projects for preliminary design. The two highest priority projects for advancing to preliminary design and environmental compliance were the Saint Anthony MHP and Valley View MHP. Development of the Saint Anthony MHP Water Consolidation Project is the subject of this IS/MND. A separate IS/MND has been prepared for the Valley View MHP Water Consolidation Project.

2.1.2 Project Purpose and Need

The proposed project is necessary to address public health potable water concerns in local DACs. The project would create water reliability for potable water for the identified SWSs to ensure adequate public health throughout the project area. The local groundwater supplies of the SWSs have shown elevated concentrations of arsenic and other constituents that are currently regulated by the State or may be in the near future (e.g., hexavalent chromium). Based on Riverside County DEH Inspection Reports, all three SWSs within the proposed project show a maximum contaminant level (MCL) exceedance for arsenic at their respective groundwater supply wells. All three SWSs have installed treatment that addresses the regulatory violations.

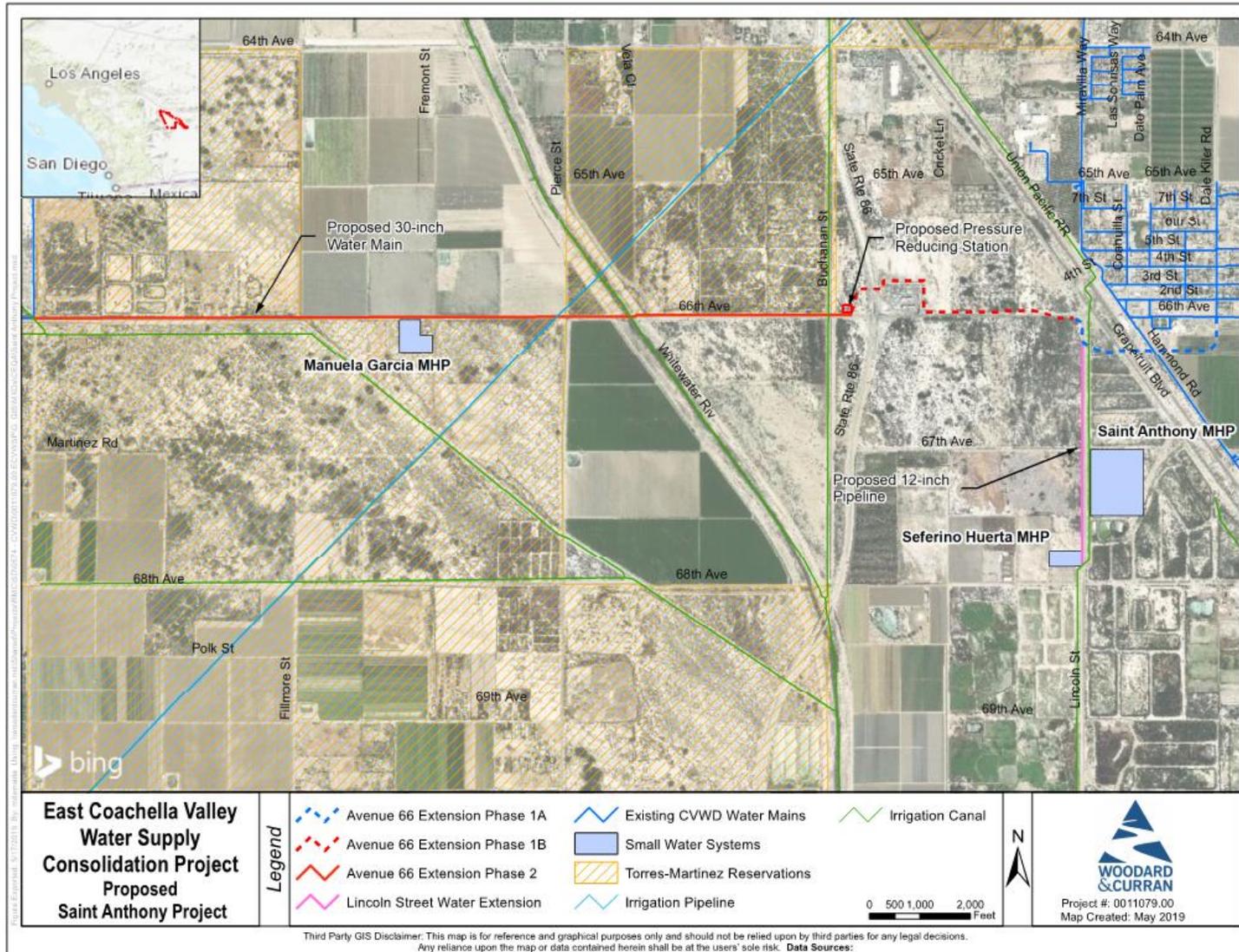
The proposed project would also provide redundancy and security for the Manuela Garcia and Seferino Huerta MHP SWSs, which are currently operated by the system owners. Consolidating them into the CVWD potable water system would provide a higher level of reliability and redundancy as the CVWD system is operated and maintained by full-time State of California certified operational staff. Additionally, the existing fire suppression systems for the SWSs offer less protection than a municipal water supply could provide; as such, consolidation into the CVWD system would provide a more robust and reliable water supply for fire protection.

The Manuela Garcia and Seferino Huerta SWSs have minimal to no security for their drinking water systems. The Saint Anthony SWS appears to provide a higher level of security with a more robust chain link fence and well building. However, these systems are still exposed to risk of vandalism or other unauthorized access. Consolidation into the CVWD municipal system would eliminate this risk exposure.

The objectives of the proposed project are twofold:

1. To improve the reliability, safety, and security of the water supply to rural DACs of the Saint Anthony MHP Water Consolidation Project that are not currently connected to the CVWD potable water system; and
2. To implement a cost-effective, technically feasible, long-term water supply solution for the drinking water quality deficiencies identified in the existing small water systems of the Saint Anthony MHP Water Consolidation Project.

Figure 2-1: Saint Anthony MHP Water Consolidation Project – Site Location Map



2.2 Environmental Setting

The proposed project is located in the eastern portion of the greater Coachella Valley within Riverside County, California near the community of Mecca. California State Route 111 borders the project area to the east. The project is bounded by Avenue 65 and Avenue 68 on the north and south, respectively. Highway 86 and the Whitewater River Stormwater Channel run north-south through the project area, as shown in **Figure 2-2**. The land use and zoning designations are summarized in **Table 2-1**.

The eastern portion of the Coachella Valley is located at the northern end of the Salton Sea, California's largest inland sea. Physically, the eastern Coachella Valley is bounded by the Santa Rosa Mountains to the west, and the Mecca Hills and the edge of Joshua Tree National Park to the northeast. The project area is located in the Coachella Valley region of the Salton Sea Air Basin, and it is located in the Whitewater River Watershed. The area encompasses rural desert communities, agricultural production, and the Jacqueline Cochran Regional Airport. The Torres-Martinez Desert Cahuilla Indians Reservation occupies significant portions of the southwestern eastern Coachella Valley. This reservation is designated in a checkerboard pattern extending south from Avenue 62 on through to the Riverside County border into Imperial County (County of Riverside 2016).

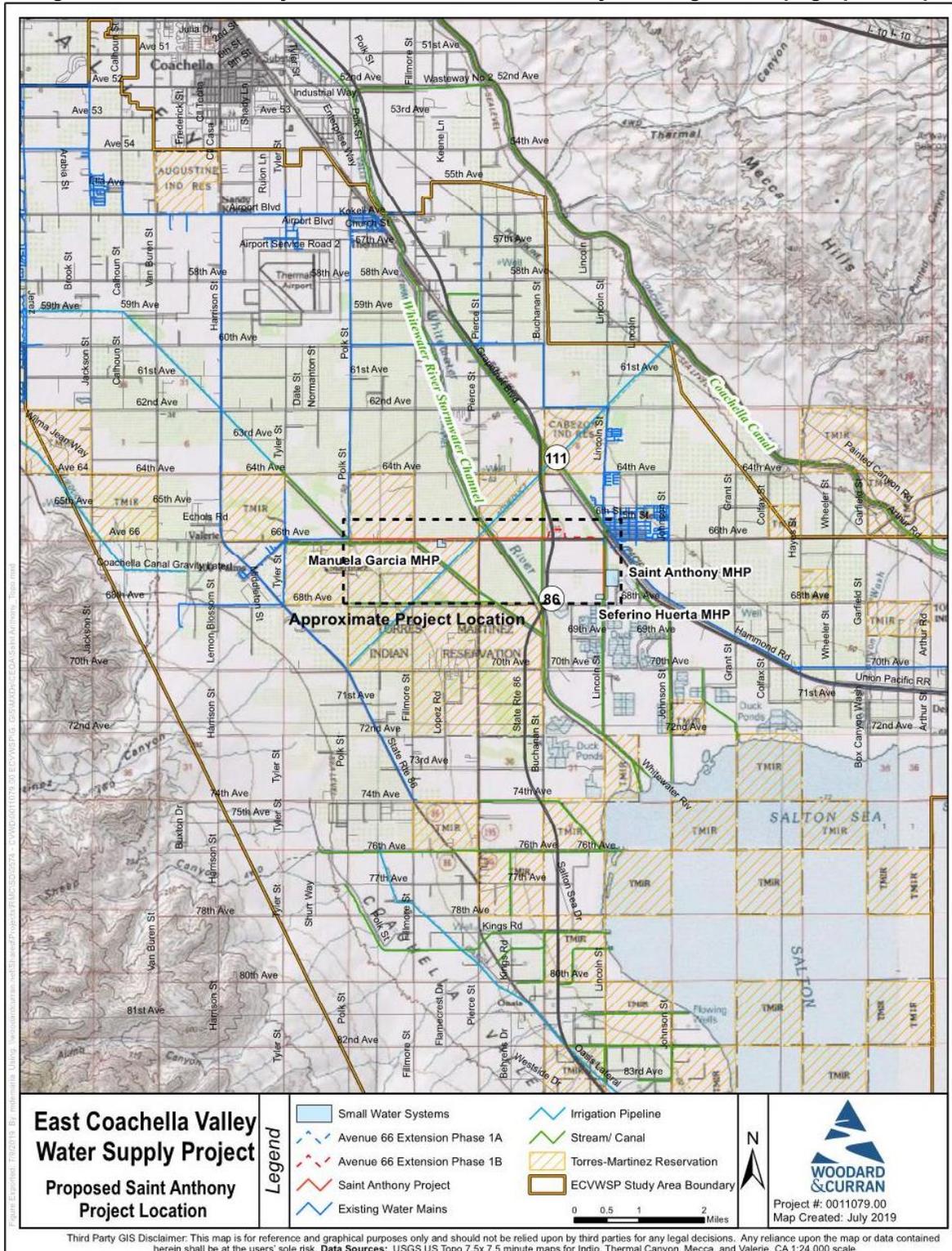
The small residential/agricultural community of Mecca is located southeast of Thermal east of State Route 111, and predominantly houses permanent residents working in the agricultural sector. Areas are also set aside for light industrial and commercial uses. Mecca is characterized by its traditional Mexican heritage. Mecca serves as a service center for commuters and truckers due to its location along State Route 111 and Highway 86. These routes are major transportation corridors for goods and agricultural movement to and from the Coachella Valley, Brawley and Imperial County, and Mexico. Mecca is the main entrance into the Salton Sea State Recreational Park on the Salton Sea's northern shoreline. Downtown Mecca includes a library, a church, school facilities, a fire station, the Boys and Girls Club of the Coachella Valley and the College of the Desert satellite campus (County of Riverside 2016).

State Route 111 and Highway 86 are the main north-south connector routes within the east Coachella Valley. The Southern Pacific Railroad runs adjacent to State Route 111 and the Salton Sea, to Riverside County's southern boundary. State Route 111, from Bombay Beach on the Salton Sea to Avenue 66 near Mecca, approximately one-half mile east of the proposed project, is a State-eligible Scenic Highway, providing views of the Salton Sea and the surrounding mountainous wilderness. Interstate 10 from Chiriaco Summit to the intersection with Highway 86, approximately nine miles north of the proposed project, is a County-eligible Scenic Highway. The project site is serviced by regional Class I bike paths and regional trails (County of Riverside 2016).

The proposed project lies within the boundaries of the *Coachella Valley Multiple Species Habitat Conservation Plan and Natural Community Conservation Plan* (referred to as the CVMSHCP). The CVMSHCP is a comprehensive multiple species habitat conservation planning program that addresses multiple species needs, including habitat and the preservation of natural communities in the Coachella Valley area of Riverside County. One of the MHP sites (Seferino Huerta) is located within *Coachella Valley Stormwater Channel and Delta CVMSHCP Conservation Area of the CVMSHCP*; and another (Saint Anthony MHP) is located adjacent to this Conservation Area. . The CVMSHCP was adopted by the plan participants in 2007 and 2008 and permits were issued by the wildlife agencies in late 2008 (County of Riverside 2016). CVWD is a permittee to the CVMSHCP.

The eastern Coachella Valley is traversed by the San Andreas fault, an active fault with a significant probability of earthquake activity; the proposed project site is located in an area of high liquefaction susceptibility. A large 100-year floodplain extends southerly from Thermal to the Salton Sea, approximately one-half mile west of the Seferino Huerta and Saint Anthony MHP sites, and overlapping the Manuela Garcia Water site. The desert and mountainous regions in the East Coachella Valley, roughly three miles to the west and to the east of the proposed project site, have a high and very high wildfire susceptibility; however, the wildfire susceptibility is moderate to low in the valley (County of Riverside 2016).

Figure 2-2: Saint Anthony MHP Water Consolidation Project – Regional Topographic Map



Surrounding Land Uses

The Seferino Huerta and Saint Anthony MHP sites are bordered as follows:

- North: mixed use, rural residential, and commercial retail lands; the community of Mecca; and the intersection of State Route 111 and Highway 86,
- East: agricultural and mixed-use lands and State Route 111,
- South: agricultural and rural residential lands. Salton Sea further south, and
- West: rural residential and agricultural lands; Highway 86; and the Whitewater River Stormwater Channel. Torres-Martinez Reservation further to the west.

The Manuela Garcia Water site is bordered as follows:

- North: agricultural land,
- East: Torres-Martinez reservation. The Whitewater River Stormwater Channel, Highway 86 and State Route 111, and the community of Mecca further to the east,
- South: Torres-Martinez reservation. The Salton Sea further south, and
- West: Torres-Martinez reservation. The community of One Hundred Palms further west.

Land uses on the SWS sites include both mobile homes and single family residences, as well as onsite water and septic systems, access roads and undeveloped land.

2.3 Existing Facilities and Conditions

The proposed project consists of three privately owned SWSs: Manuela Garcia Water, Saint Anthony MHP, and Seferino Huerta. Detailed descriptions of the existing facilities, conditions, and water quality for each SWS are provided below. The existing potable water supply for the three SWSs consists of local groundwater supplied by privately owned groundwater wells. The SWSs do not have access to surface water or municipal water supplies; there are no alternate potable water sources available in the event that the operation of the potable wells is interrupted.

The systems for Manuela Garcia and Seferino Huerta are operated and maintained by the property owners. The system for Saint Anthony MHP is maintained and operated by a D3/T2 operator.

The capacity of the supply well for each SWS is not known, as pumps curves, well development reports, and flow metering records are not available. Discussions with the SWS owners suggest that the capacity for their respective supply wells is adequate to meet current average daily demands. However, it is not clear if they are sufficient to meet maximum day demands. Leakage in the pipelines of each SWS is not known because well discharge flow for each system is not metered.

The County of Riverside requires the SWSs to have a minimum fire suppression storage capacity of 15,000 gallons for emergency conditions. The three SWSs have fire suppression storage tanks ranging from 15,000 to 20,000 gallons in total capacity on site. Manuela Garcia Water and Seferino Huerta meet the current County requirement for emergency storage and have enough emergency storage capacity to meet the anticipated maximum emergency daily demand for the system. Saint Anthony MHP meets the current County requirement for emergency storage but does not have enough emergency storage capacity to meet the anticipated maximum emergency daily demand for the system.

Table 2-2 summarizes the existing service connections and estimated population associated with the proposed project, as well as an estimate of water supply capacity in terms of maximum daily water demand.

Table 2-2: Saint Anthony MHP Project Connections

Small Water System	Existing Service Connections	Estimated Population ¹	Estimated Max. Day Demand (gpm) ²
Manuela Garcia Water	14	56	7.56
Saint Anthony MHP	95	380	51.3
Seferino Huerta	13	52	7.02
Total	122	488	65.88
1. Assumes 4 persons per service connection. 2. Assumes a max day demand of 0.54 gpm/unit			

Further details on the existing facilities and conditions at each SWS can be found in *Sections 2.4.4.1* through *2.4.4.3*, below

2.4 Proposed Project Description

A layout map showing the location of the proposed project system components is presented in **Figure 2-1**. New infrastructure for the proposed project would consist of the following:

- A 30-inch diameter Avenue 66 water main, which includes the Phase 1a design which is currently underway by CVWD in conjunction with the County of Riverside’s roadway grade separation project, along with Phases 1b and 2 of the Avenue 66 water main which would be constructed by CVWD and are included in this IS/MND. Note that the Avenue 66 Phase 1a pipeline is not included in this IS/MND.
- 12-inch diameter Lincoln Street water main.
- 1-inch, 2-inch, and 4-inch diameter water service laterals. These would connect to the Avenue 66 Phase 2 pipeline and 12-inch diameter water pipeline along Lincoln Street and extend to the property boundaries of each SWSs.
- 2-inch diameter pipelines on SWS property to complete service to the existing SWSs.
- 6-inch diameter fire service pipelines. These would connect to the Avenue 66 pipeline and 12-inch Lincoln Street transmission pipeline and extend to fire hydrants or backflow preventors to provide fire service to each SWS. Fire hydrants would be located in accordance with CVWD and Riverside County Fire Department standards.

A summary of the pipeline components is presented in **Table 2-3**. The proposed project (Phases 1b and 2, Lincoln Street water main, and onsite piping) consists of a total of approximately 27,000 linear feet of pipeline, four water meters, two fire hydrants, a tee-valve and reducer, a pressure reducing station, and a fire service backflow preventor. Overall, the project would deliver 106 acre-feet per year (AFY) of potable water to meet a maximum day demand of 65.88 gallons per minute (gpm). The proposed project infrastructure is described in further detail below.

Table 2-3: Saint Anthony MHP SWS Consolidation Project Summary

Small Water System	Water Main 30-inch Diameter Pipeline Length (ft)	Water Main 12-inch Diameter Pipeline Length (ft)	Fire Service Lines 6-inch Diameter Pipeline Length (ft)	On-Property Water Service Lines 1-inch, 2-inch, and 4-inch Diameter Pipeline Length (ft)	Additional Components
Avenue 66 – Phase 1b and 2	21,900	--	--	--	Tee-valve, reducer, pressure reducing station
Lincoln Street Water Main	--	4,500	--	--	--
Manuela Garcia Water	--	--	30	90	two water meters, fire hydrant assembly
Saint Anthony MHP	--	--	20	340	fire service backflow preventor
Seferino Huerta	--	--	10	32	two water meters, fire hydrant assembly
Total	21,900	4,500	60	460	--

2.4.1 Avenue 66 Water Main

The Avenue 66 water main would be a 30-inch diameter ductile iron potable water pipeline approximately five miles long (approximately 25,800 linear feet long). Following is a summary of the three phases currently in various stages of design:

- Phase 1a is being designed and constructed by CVWD in conjunction with the County of Riverside grade separation project over the Union Pacific Railroad, State Route 111, and Hammond Road (see **Figure 2-3**). The Phase 1a pipeline is 3,900 linear feet and extends from the intersection of Avenue 66 and Dale Kiler Road south and west, across the Union Pacific Railroad, State Route 111, and Hammond Road, to a new intersection of Avenue 66 and Lincoln Street. This project involves realigning Lincoln Street, constructing a new intersection at Avenue 66 and Lincoln Street, realigning the Lincoln Street and State Route 111 intersection, and placement and relocation of utilities (including a new 30-inch water main). Caltrans issued a Categorical Exemption for the project in 2017 (Caltrans 2017). The Phase 1a segment of the Avenue 66 water main is not included in this IS/MND.
- Phase 1b is currently in design by CVWD to extend the water main from the new Lincoln Street intersection to the western side of Highway 86. The Phase 1b pipeline is 5,600 linear feet and extends from the new intersection at Avenue 66 and Lincoln Street into the private property along the north side of the alignment (outside of the relocated Caltrans right-of-way), jogs north around the gas station property adjacent to Highway 86, then crosses Highway 86 and jogs back south approximately 50 feet north of the Avenue 66 right-of-way (see **Figure 2-3** and **Figure 2-4**). CVWD recently completed separate biological and cultural resources analyses of the Phase 1b alignment (Dokken 2018 and Dokken 2019; see Appendix D and Appendix C of

Appendix C) to support right-of-way acquisition. Those reports are incorporated into this IS/MND to address portions of the APE north of the roadway right-of-way that were not included in the ECVWSP surveys.

- Phase 2 extends from the terminus of Phase 1b (just west of Highway 86) to Polk Street to the west (**Figure 2-5**). The Phase 2 pipeline is 16,300 linear feet. To the east, it would connect to the terminus of the Avenue 66 Phase 1b pipeline located at the westerly right-of-way of Highway 86. To the west, it would connect to the existing CVWD water system at the intersection of Avenue 66 and Polk Street.

The Avenue 66 water main would be used to serve various domestic water supply demands in the area. The Phase 1a pipeline is currently in detailed design by CVWD's consultant, with construction to be completed in 2021. Note that the 30-inch diameter was sized based on the *2015 Urban Water Management Plan* (CVWD 2016) to accommodate future demand within the region and to provide additional redundancy to the community of Mecca; it is not intended to solely provide service to the Saint Anthony Project. However, it is not being included in this IS/MND as part of the proposed project because it is covered under separate environmental documentation.

The Avenue 66 Phase 2 pipeline would be constructed approximately 5 feet south from the northern pavement edge to allow for continued traffic along one lane of Avenue 66 during construction, while the Phase 1b pipeline would be located outside of the Caltrans right-of-way about 50 feet north on private property. Final alignment is pending utility research, survey and mapping. The Phase 2 extension would require special crossings at a CVWD irrigation ditch, the Whitewater River Stormwater Channel, and a 72-inch irrigation pipeline along the Avenue 66 alignment as shown on **Figure 2-5**. The irrigation ditch, stormwater channel, and irrigation pipeline would be traversed using trenchless construction such as horizontal directional drilling (HDD) or jack and bore techniques. Use of open trench installation at these three locations would be further evaluated during the detailed design stage based on permitting requirements, required depth, and other information yet to be obtained. Trenchless method, if required, would be determined during final design based on geotechnical data and the geometry of the proposed pipeline.

The following assumptions were also made at this stage of design for the 30-inch diameter pipe:

- The ductile iron pipeline installed would be zinc-coated Class 250 restrained pipe with restrained type joints (US Pipe TR Flex or equal). The use of restrained joint ductile iron piping and stated pressure rating are in accordance with CVWD requirements for new pipe installation.
- The ductile iron pipeline installed would be wrapped in polyethylene encasement. Additional corrosion protection may be required in certain areas; therefore, an allowance is provided for additional corrosion protection measures. Corrosion areas would be identified during final design for all pipelines and included in the construction bid documents. Geotechnical data and corrosivity data would be provided during the pipeline design process to identify where additional protection measures would be needed.
- The 24-inch tee, valve and 30-inch by 24-inch reducer would be installed to connect to the existing CVWD 24-inch pipeline on Polk Street to allow the connection of the 30-inch Phase 2 pipeline at the west end. The existing main would need to be temporarily taken out of service and dewatered for this connection.

Figure 2-3: Phase 1a and 1b Alignments for Avenue 66 Water Main, page 1

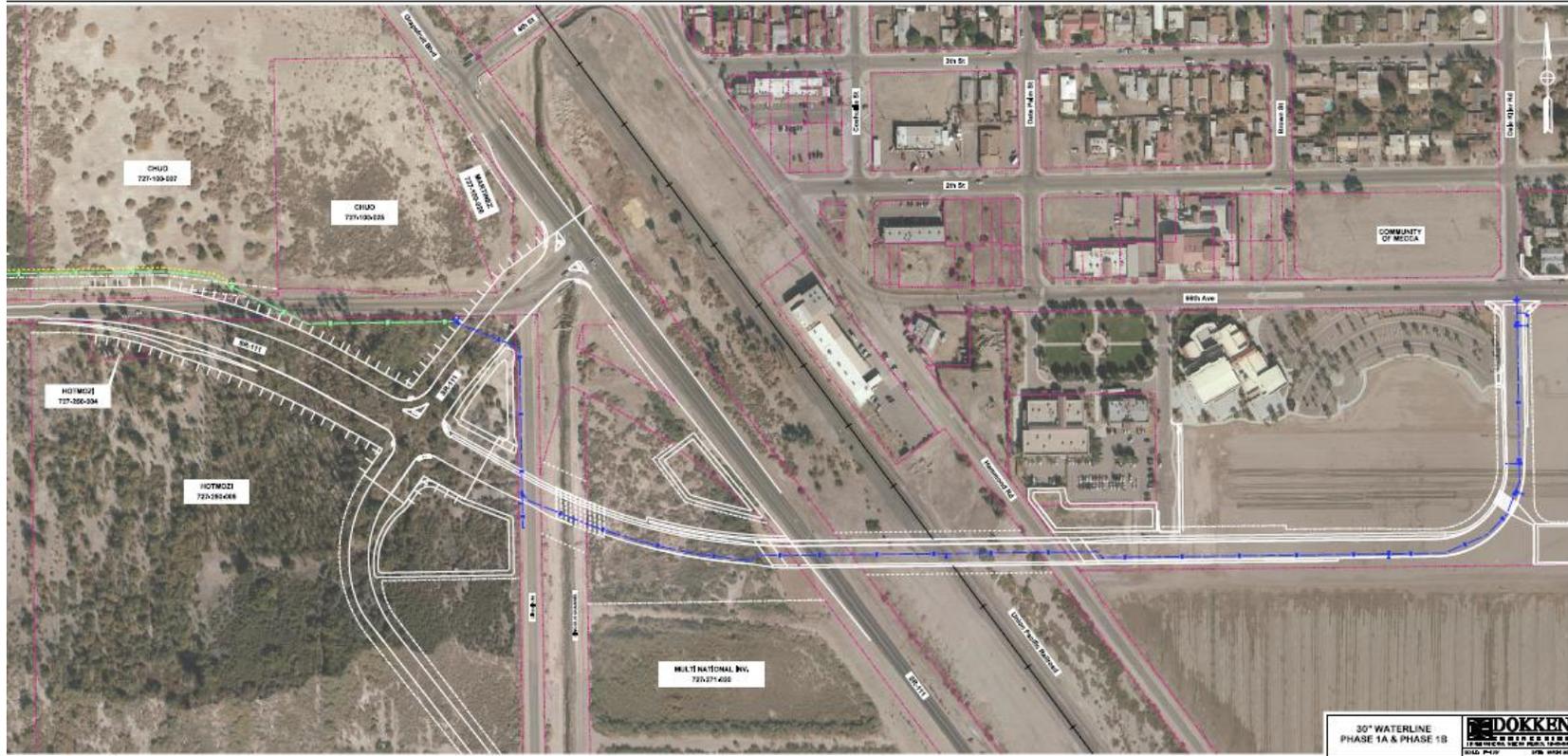


Figure 2-4: Phase 1a and 1b Alignments for Avenue 66 Water Main, page 2

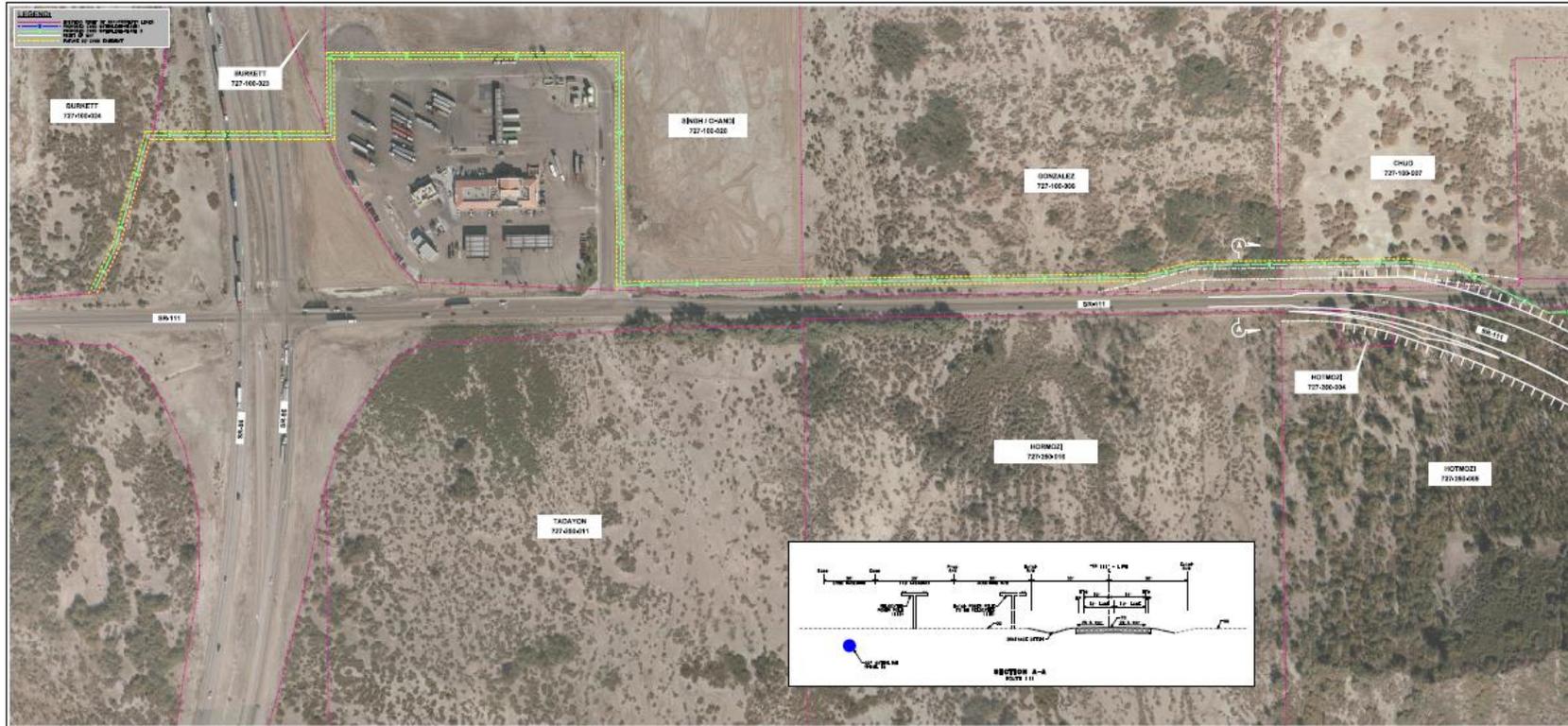
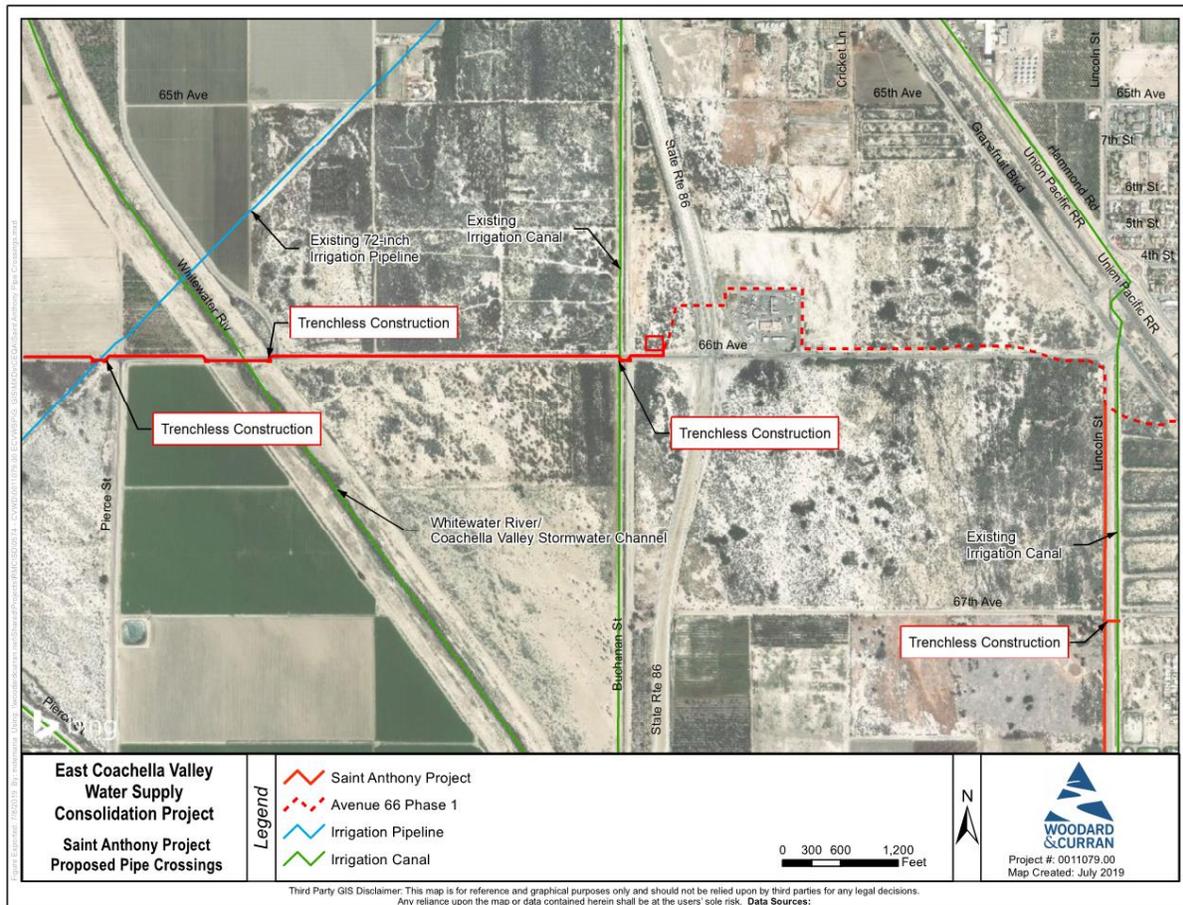


Figure 2-5: Avenue 66 Phase 2 Extension - Trenchless Crossing



2.4.2 Avenue 66 – Pressure Reducing Station

A pressure reducing station would be required at the western terminus of the Avenue 66 Phase 1 pipeline where it would connect to the Avenue 66 Phase 2 extension (see **Figure 2-1**). The pressure reducing station would reduce from a design pressure of 115 psi on the Phase 1 pipeline to 75 psi on the Phase 2 extension (i.e., design pressure reduction of 40 psi) through a flow range of 170 gpm during winter months to an MDD of 2,500 gpm during summer months. The pressure reducing station would consist of an 8-inch pressure reducing valve. A second 8-inch pressure reducing valve would also be included as part of the pressure reducing station for redundancy in accordance with Section 5 of the *CVWD Development Design Manual*. The pressure reducing station is anticipated to be housed below grade in a vault.

2.4.3 Lincoln Street Water Main

The Lincoln Street water main would be a 12-inch diameter ductile iron potable water pipeline approximately 4,500 linear feet long. It would connect to the new Avenue 66 Phase 1a alignment located south of the existing Lincoln Street and Avenue 66 intersection (north of the new intersection – see **Figure 2-3** above). The 12-inch diameter was sized based on the fireflows and demands needed to serve the Saint Anthony MHP Water Consolidation Project.

The Lincoln Street pipeline alignment would be constructed approximately 5 feet west from the pavement edge to allow for continued traffic along one lane of Lincoln Street during construction. Final alignment within the roadway would be determined during final design.

The following assumptions were also made at this stage of design for the 12-inch diameter pipe:

- The ductile iron pipeline installed would be zinc-coated Class 350 restrained pipe with restrained type joints (US Pipe TR Flex or equal). The use of restrained joint ductile iron piping and stated pressure rating are in accordance with CVWD requirements for new pipe installation.
- The ductile iron pipeline installed would be wrapped in polyethylene encasement. Additional corrosion protection may be required in certain areas; therefore, an allowance is provided for additional corrosion protection measures. Corrosion areas would be identified during final design for all pipelines and included in the construction bid documents. Geotechnical data and corrosivity data would be provided during the pipeline design process to identify where additional protection measures would be needed.

2.4.4 Service Laterals and On-Property Piping

Two water service laterals would connect to the 12-inch diameter water main pipeline along Lincoln Street. A 4-inch diameter ductile iron pipe would provide service to the Saint Anthony MHP SWS and the second 1-inch diameter copper pipe would provide service to the Seferino Huerta MHP SWS.

One 2-inch copper lateral would connect to the Avenue 66 Phase 2 pipeline to provide service to the Manuela Garcia MHP SWS, located to the west of the Whitewater River Stormwater Channel crossing.

Service laterals would be extended to each SWS property boundary where a set of two three-quarter inch CVWD master meters would be installed. Once on property, service lateral piping would be reduced in diameter to match the existing onsite distribution system piping. New piping would be extended from the property boundary to an appropriate connection point to existing onsite piping. Overall, approximately 400 to 500 feet of piping is proposed on the SWS properties (see **Table 2-3**); however, less may be required because some of the existing onsite piping is relatively new and may not need to be replaced.

The following assumption was made for the service laterals: The copper pipeline installed would be soft type-K. The use of copper pipe is in accordance with CVWD requirements for new water service pipe installation.

Finally, modifications to the existing onsite SWSs may include removal of some existing infrastructure (e.g., tanks, pipelines, connections) and demolition of the wells. Wells that are currently used to support an existing agriculture operation may remain if exempted by the Riverside County DEH, determined on a case-by-case basis.

2.4.4.1 Manuela Garcia Mobile Home Park

Existing Conditions

The Manuela Garcia SWS serves a small mobile home park with a total of 14 service connections. The SWS is reliant on an 8-inch diameter groundwater well that is 500 feet (ft) deep. The well has a submersible pump that delivers water to six hydro-pneumatic pressure tanks to supply the potable water distribution system. There is also a second well with a 510 ft deep, 6-inch casing. This well was originally used for potable water but has since been repurposed for irrigation and is no longer connected to the potable system.

The potable water distribution system consists of 2-inch schedule 40 PVC service lines, shown on **Figure 2-6**.

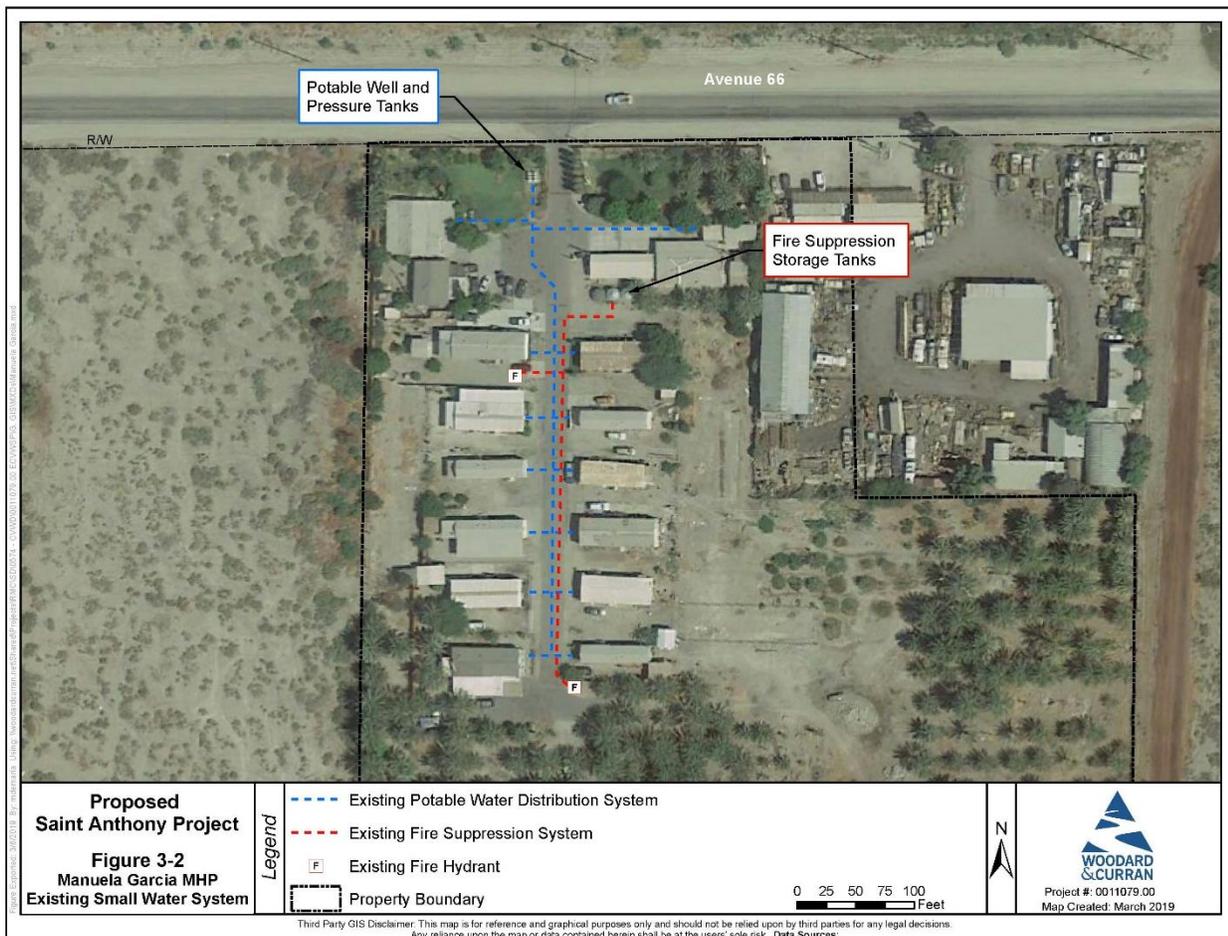
A separate fire suppression system consists of 4-inch C900 PVC piping and two fire hydrants. The fire suppression system is gravity supplied by three 5,000-gallon storage tanks. The fire suppression system is separated from the potable water distribution system via an air gap between the supply line and the tanks.

The potable groundwater well and pressure tanks that serve the Manuela Garcia SWS are secured by a chain link fence. The well was drilled in 2011 to replace an old well that has since been converted to an irrigation well for the property. The system is operational, although the potable water well appears to show signs of corrosion on the exterior. The well pump, pressure tanks and above grade piping appear to be in good condition free of visible corrosion. The age of the three 5,000-gallon fire suppression storage tanks is unknown. Two are corrugated, galvanized steel tanks and appear to be in good condition, free of visible corrosion. The third tank is high-density polyethylene (HDPE) and is also in good condition. The above grade piping shows minor corrosion at the valves.

The Manuela Garcia SWS DEH inspection report from February 2018 stated that the well exceeded the State of California MCL for arsenic at 10 ug/L. All other regulated constituents were below their respective MCLs.

Under the counter RO treatment units were installed in each mobile home in 2013 to reduce arsenic. The effluent from the treatment units was tested for arsenic in February 2018 and all treatment units met standards.

Figure 2-6: Manuela Garcia Existing Facilities

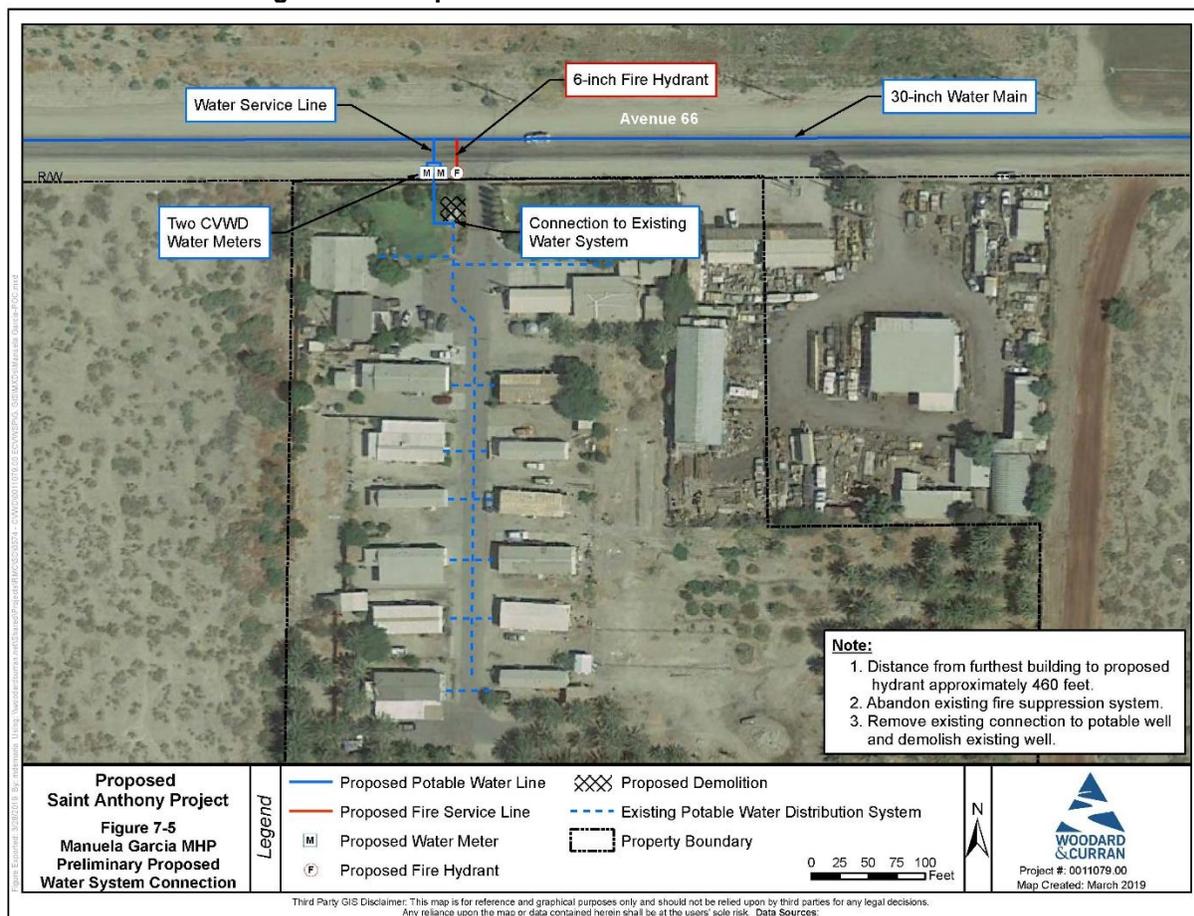


Proposed Project

Approximately 35 linear feet of 2-inch diameter water service lateral would be needed to connect from the Avenue 66 Phase 2 water pipeline to a set of two three-quarter-inch water meters at the property line. An additional 55 feet of 2-inch diameter pipe would be required on-property to connect from the service lateral to the existing potable water distribution system, shown in **Figure 2-7**. All onsite piping is assumed to be Schedule 80 PVC pipe.

Approximately 30 linear feet of 6-inch diameter polyethylene wrapped DIP and fire hydrant assembly would connect to the 30-inch Avenue 66 pipeline to provide fire service to the Manuela Garcia MHP SWS.

Figure 2-7: Proposed Manuela Garcia Point of Connection



2.4.4.2 Saint Anthony Mobile Home Park

Existing Conditions

The Saint Anthony MHP is a community water system that serves approximately 95 mobile homes. The groundwater source for the SWS is a 650 ft well with an 8-inch casing for 400 ft and 6-inch casing for the remaining 250 ft. The well and a 15 hp submersible pump were installed in February 2012. Water is pumped from the well to a 20,000-gallon steel tank located on the northwest portion of the property boundary. Water from this tank is pumped through a 6-inch PVC pipeline to the potable water distribution system. The Saint Anthony MHP does not have a separate fire suppression system. The Saint Anthony MHP system is shown in **Figure 2-8**.

The water supply at the Saint Anthony MHP currently and has historically exceeded the 10 mg/L MCL for arsenic. To address this, a walk-up RO treatment station was installed in 2010 to provide safe drinking water to the MHP residents. The original unit was replaced with a new RO system in 2015. Untreated potable water is still conveyed directly to the mobile homes through the potable system for non-drinking domestic uses.

The RO treatment station was installed in 2010 and replaced in 2015 to address the arsenic concentrations of the groundwater well which exceeded the regulatory MCL. There are two small pressure tanks and a variable frequency drive (VFD) controlled booster pump after the 20,000- gallon steel tank. The water is chlorinated with sodium hypochlorite prior to the tank to provide a disinfection residual.

The potable well for the Saint Anthony MHP is housed in a building constructed of wood framing and wood siding. The well building and storage tank are secured behind a chain link fence. The potable well and storage tank was installed in February 2012 to replace the old groundwater well, which was then destroyed in 2014. The condition of the well is unknown as it is enclosed within the building; however, per the owner, the potable water system is operational. The well building and storage tank appear to be in good condition. The storage tank has some visible corrosion on the water level indicator on the outside of the tank and minor corrosion at the above-grade pipe connections.

According to the March 2017 DEH inspection report, Saint Anthony MHP samples the well, treatment station and distribution system monthly.

Arsenic is required to be sampled from the groundwater well quarterly. Regular exceedances for arsenic above the 10 ug/L MCL resulted in a Compliance Order being issued by the State of California in March 2010. The most recent arsenic sample showed an arsenic concentration of 21 ug/L in February 2017. The running annual average for arsenic is currently 19 ug/L. Both findings indicate that the issue is still present and persistent.

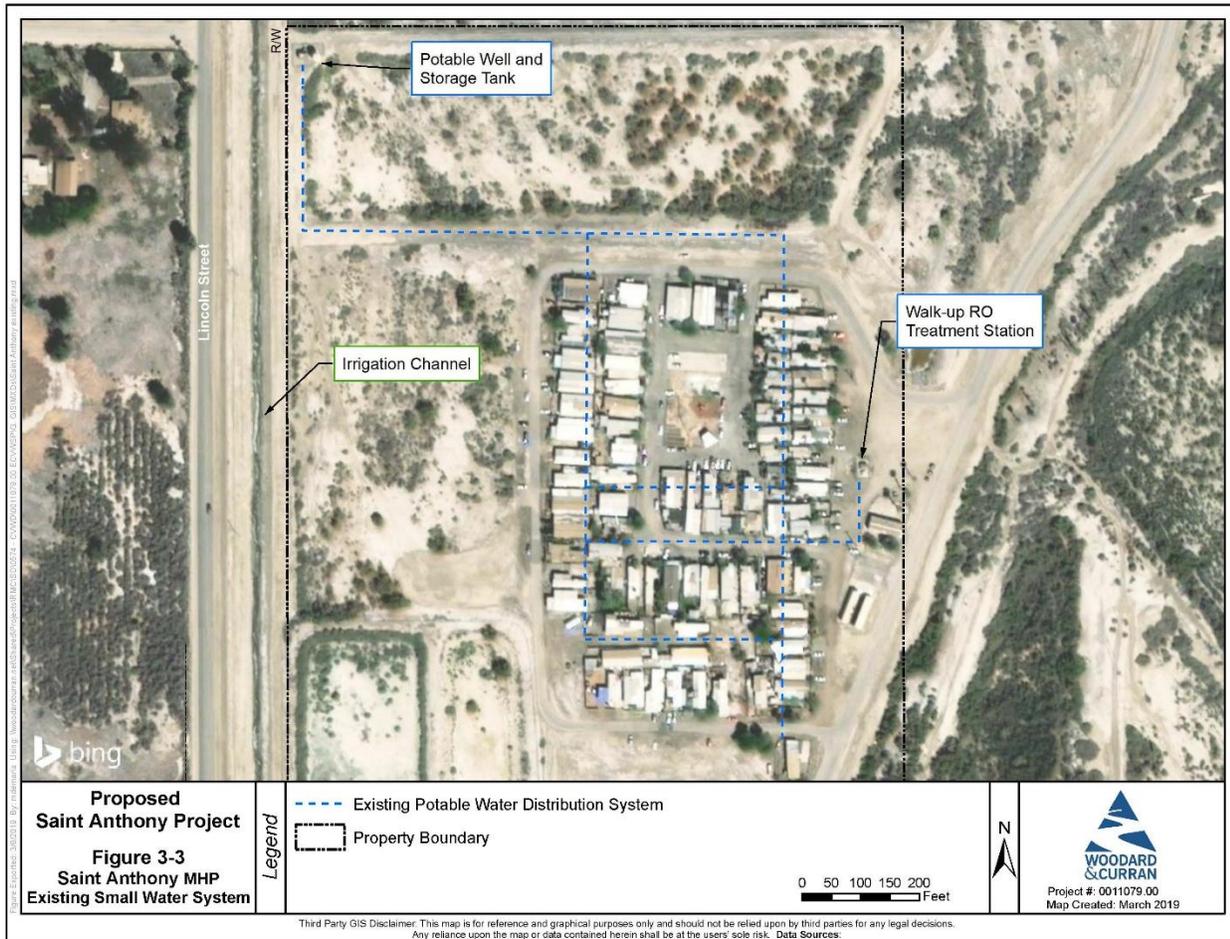
In response to the 2010 Compliance Order, an interim RO treatment station was approved by Riverside County DEH and installed in April 2010; the original system was replaced with a larger RO treatment station in 2015. The current system uses a Nimbus CIV 6000 RO system and is configured as a walk-up fill station where residents can obtain potable water safe for consumption. It is approved for use only as an intermediate measure and does not comply with the conditions of approval under Conditional Use Permit (CUP) 03645 or Substantial Conformance No. 1 to CUP 03645. As an interim system, it is only intended for use until a centralized RO system is approved and installed, or the Saint Anthony MHP potable system is consolidated into the CVWD municipal water system. A centralized water treatment system will be required by DEH if the Saint Anthony system is not consolidated into the CVWD municipal system.

For treatment, the raw well water is pumped to the Nimbus treatment unit which is enclosed in a small climate-controlled building located near the entrance of the MHP. Water first passes through a sediment filter, followed by a water softener and the Nimbus RO unit. The Nimbus RO unit includes membrane desalinators and carbon pre-filters. A delivery pump conveys the treated water to a distribution valve located on the outside of the building for filling of containers. The treatment unit can produce 6,000 gpd of treated water.

The RO system control panel includes: a concentrate recirculation valve, pre-filter inlet/outlet pressure gauges, RO vessel feed, concentrate, and product pressure gauges, a control panel, product flow meter, concentrate flow meter, recirculation flow meter and a TDS monitor. Concentrate generated by the RO system is pumped into a holding tank and is disposed of offsite by a licensed hauler.

All arsenic results for the treated water have been below the MCL of 10 ug/L except for August 2016, which showed 30 ug/L. The treatment unit was temporarily taken out of service to diagnose and resolve the issue. The issue was resolved, and the system has since been restored to operation.

Figure 2-8: Saint Anthony MHP Existing Facilities



Proposed Project

The Saint Anthony MHP is currently located on the eastern portion of the property. Due to the existing conditions of the site and improvements required, the property owner is moving forward with plans to develop vacant land on the north and west portions of the parcel for relocation of the MHP. Onsite sewer and water improvement plan drawings for the development of the new Saint Anthony MHP were provided by the property owner. The water improvement plan for Saint Anthony was used to determine the point of connection for the new CVWD 4-inch water service lateral from the Lincoln Street water pipeline.

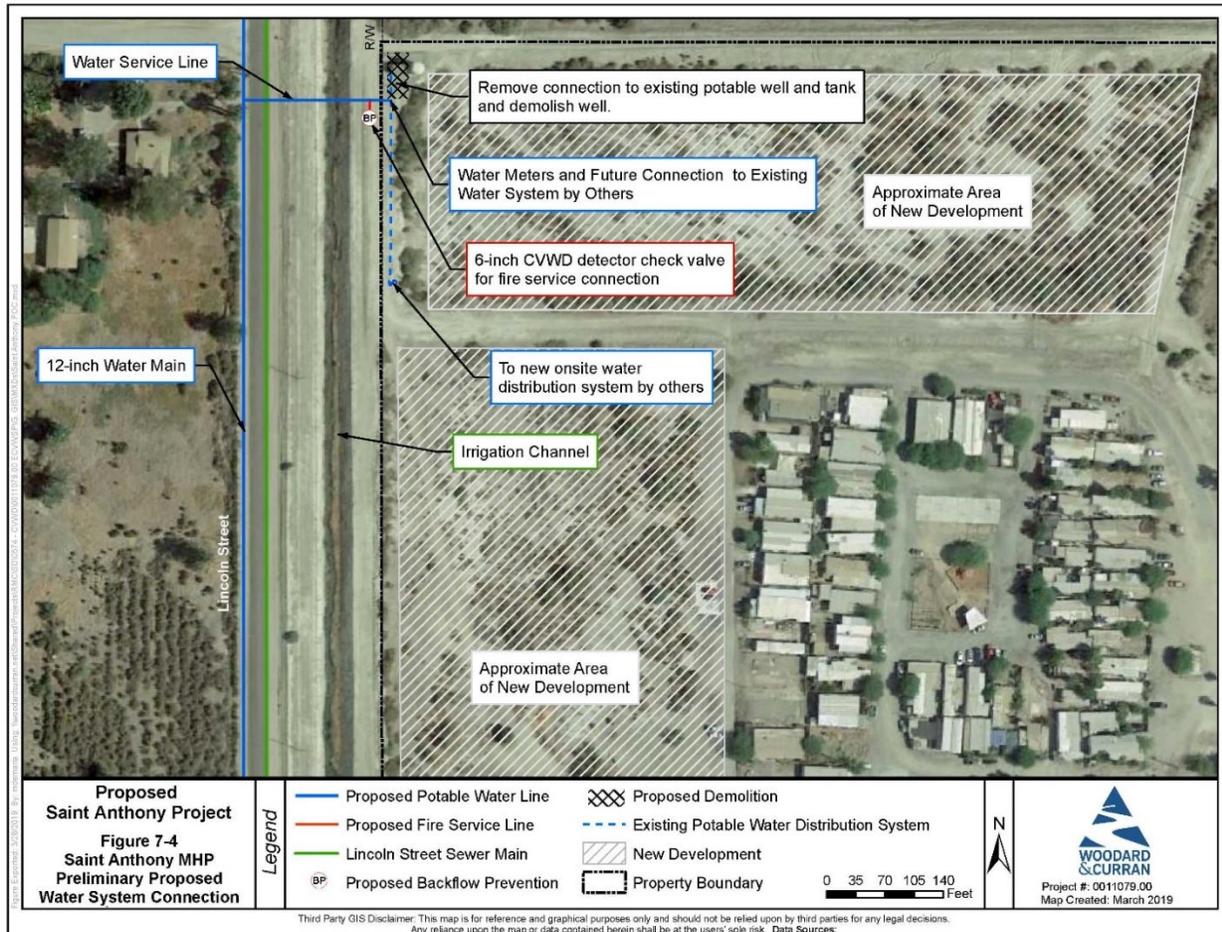
Approximately 340 linear feet of 4-inch diameter service lateral is estimated to be required to connect to the planned Lincoln Street pipeline and extend to the Saint Anthony MHP. The lateral may require a trenchless crossing of the existing CVWD irrigation channel if open cutting is determined to be infeasible. The pipeline must also avoid a proposed sewer force main that parallels Lincoln Street. The sewer crossing would need to meet the separation and construction requirements as stipulated in the CVWD Domestic Water Standard Drawings.

The irrigation channel is owned and maintained by CVWD and has a right-of-way 150 feet wide from the Saint Anthony MHP property line to the Lincoln Street center line. The sewer force main is currently under construction, located approximately 130 feet west from the Saint Anthony MHP property line. **Figure 2-9** depicts the approximate location of

the Lincoln Street water pipeline and the point of connection to the Saint Anthony MHP. The water meter installation and onsite pipe connection will be completed by others.

Twenty linear feet of 6-inch diameter polyethylene wrapped DIP fire service line would tee off of the 6-inch water service line to provide a backflow preventor for fire service connection in the future. The CVWD standard fire service backflow preventor is a 6-inch detector check valve.

Figure 2-9: Proposed Saint Anthony MHP Point of Connection



2.4.4.3 Seferino Huerta Mobile Home Park

Existing Conditions

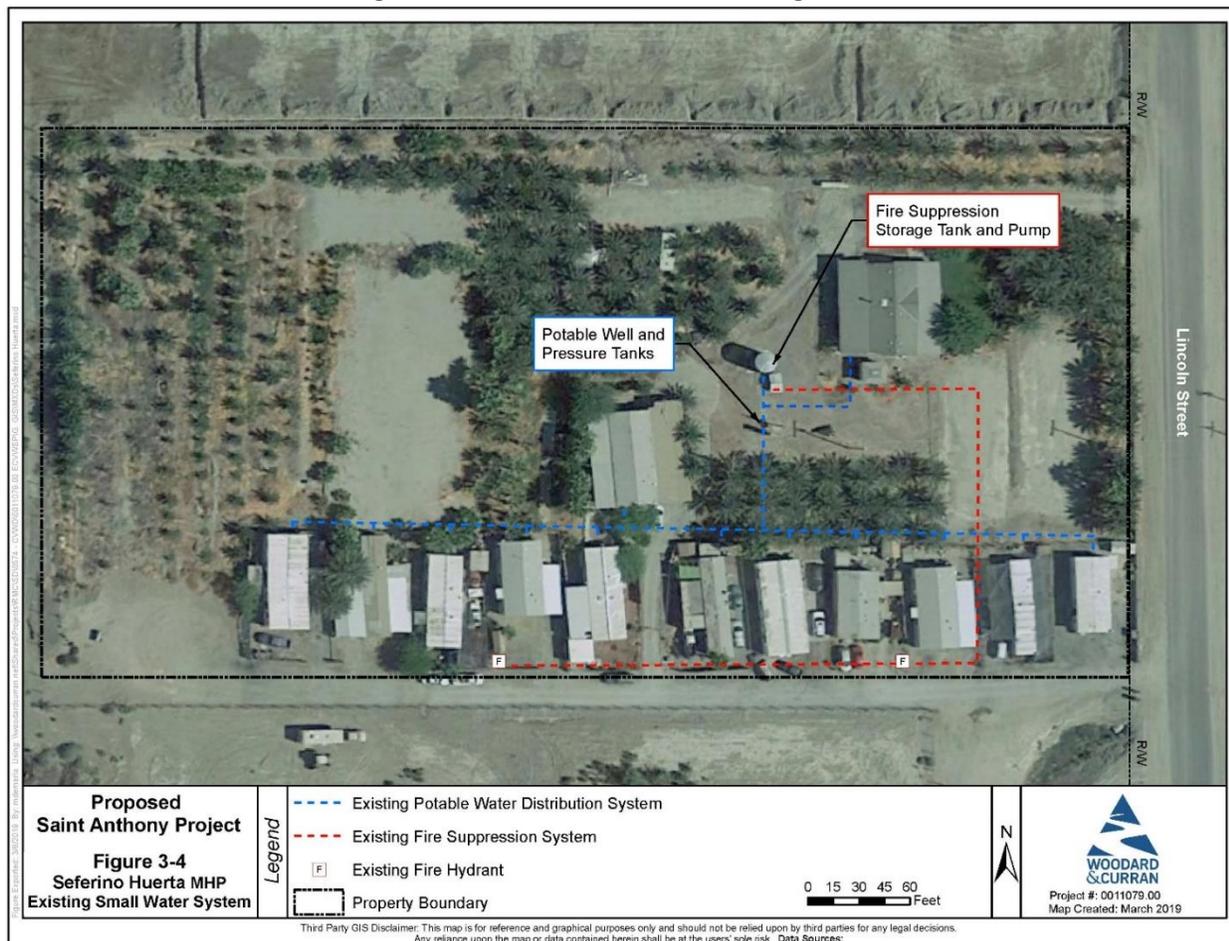
The Seferino Huerta SWS is a Polanco park that has 13 service connections. The water source for this system is a groundwater well of unknown depth with a submersible pump. The well pumps to a 100-gallon pressure tank and a separate 15,000-gallon fire suppression storage tank via an air gap. The fire suppression system pipe size and material are unknown. The 15,000-gallon tank connects to a discharge pump and pressure tank, which feed to two fire hydrants onsite. The existing Seferino Huerta distribution system is shown on **Figure 2-10**. The ages of the Seferino Huerta SWS groundwater well and pressure tank are unknown. The potable water system is operational, per discussions with the SWS owner. The pressure tank appears corrosion free and the coating appears to be intact, while the adjacent well shows some corrosion on the exterior. The 15,000-gallon fire suppression storage tank and pump are covered to

prevent weather damage; the ages of the tank and the pump are unknown. The outside of the tank and pump appear corroded.

The February 2018 DEH inspection report for Seferino Huerta SWS indicated water quality issues for iron, and arsenic. Iron exceeded the State of California secondary MCL of 0.3 mg/L (but is not generally a health hazard). Arsenic exceeded the MCL of 10 ug/L, with the most recent sample indicating 24 ug/L in March 2017.

Under-the-counter RO units (Water Maker 5-5004) for the removal of arsenic were installed at each residence in June 2017. Installations were sampled in June 2017 and arsenic results indicated non-detect values for all samples taken.

Figure 2-10: Seferino Huerta Existing Facilities

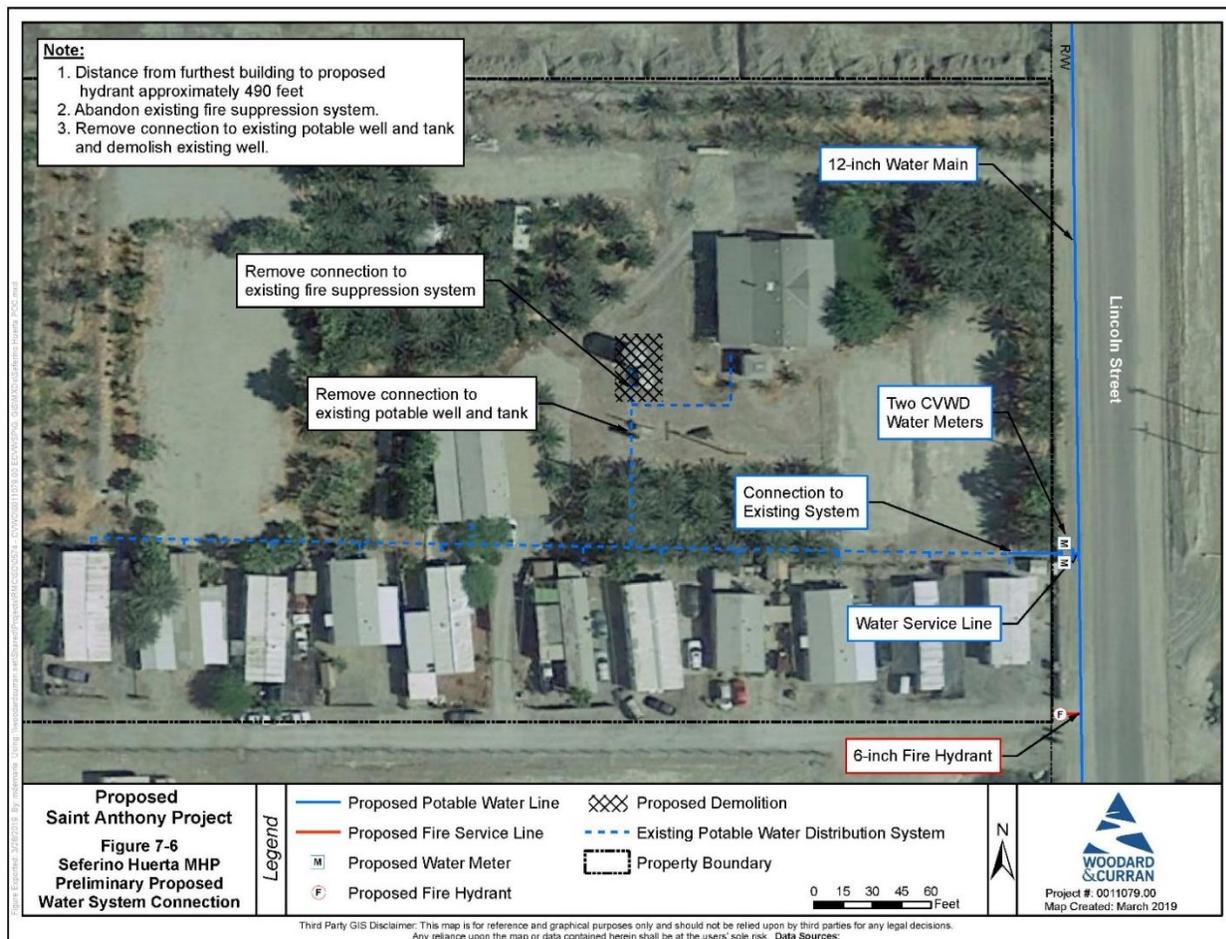


Proposed Project

Approximately 10 linear feet of 1-inch diameter water service lateral would be needed to connect from the Lincoln Street water pipeline to the Seferino Huerta SWS at the eastern parcel boundary, as shown in **Figure 2-11**. A set of two 3/4-inch water meters would be installed, and approximately 22 linear feet of 2-inch pipe would connect to the existing potable water system near the existing well. All onsite piping is assumed to be Schedule 80 PVC pipe.

Approximately 10 linear feet of 6-inch diameter polyethylene wrapped DIP and fire hydrant assembly would connect to the 12-inch Lincoln Street pipeline to provide fire service to the Seferino Huerta MHP SWS.

Figure 2-11: Proposed Seferino Huerta Point of Connection



2.4.5 Construction Methods

Well Demolition

The process for demolition of on-site wells would depend on the size and depth of the well. Generally, for shallower and/or smaller diameter wells, the well would be over-drilled and then the borehole backfilled with grout. Larger or deeper wells would require perforating the casing (often with a subsurface explosion containing bb's) and then pressure-grout the well/borehole. The work would be conducted in accordance with a County DEH well demolition permit and performed by a certified well driller (license required), with oversight by a County DEH inspector and in conformance with State well standards.

Pipeline Installation

The water pipelines would be installed within existing County of Riverside roadway rights of way and SWS properties. Typical pipeline construction processes are described below:

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

- **Surface Preparation** – Surface preparation involves removing structures (such as fences or posts), pavement, and/or vegetation from the trenching and HDD pit areas. Equipment may include jack hammers, pavement saws, graders, bulldozers, loaders, and trucks.
- **Trench Excavation/Shoring** - A backhoe, excavator, or trencher would be used to dig trenches for pipe installation. In general, trenches would have vertical side walls to minimize the amount of soil excavated, and the area needed for the construction easement. Soils excavated from the trenches, if of suitable quality, would be stockpiled alongside the trench or in staging areas for later reuse in backfilling the trench. If not reusable, the soil would be hauled off site for disposal. Disposal options include use as cover material at sanitary landfills and use as “clean fill” at other sites. In general, pipe trenches would be 3-45 feet wide and 4-10 feet deep. Deeper installations may be required under special circumstances, such as large utility or channel crossings.

Pipeline trenches, in any given location, would be open for two to three days on average. During construction, vertical wall trenches would be temporarily “closed” at the end of each work day, by covering with steel plates or backfilled. Trenches would be backfilled with either the excavated soil or imported material. Dump trucks would be used to deliver imported, engineered backfill material to stockpiles near the trenching operation. Native soil would be reused for backfill to the greatest extent possible; however, the soil may not have the properties necessary for compatibility and stability.

- **Jack and Boring** – Jack and boring employs a non-steerable system that drives an open-ended pipe laterally using a percussive hammer, thereby resulting in the displacement of soil limited to the wall thickness of the pipe. For this construction method, pits would be dug on either side of the surface feature to be avoided (e. g. stream crossing or heavily traveled roadway). The pits are typically 10-15 feet wide and 10-20 feet long for the receiving pit and up to 50 feet long for the jacking pit. The depth would depend on the feature to be avoided. The boring equipment and pipe would be lowered into the pit and aligned at the appropriate depth and angle to achieve the desired exit location. A compressor would supply air to the pneumatic ramming tool to thrust the pipe forward. A cutting shoe may be welded to the front of the lead pipe to help reduce friction and cut through the soil.

Depending on the size of the installation, spoil from inside the pipe would be removed with an auger, compressed air, water, or a combination of techniques. A seal cap would be installed on the starter pit side of the installation and spoil would be discharged into the receiver pit. Using this technique, ground surface disturbance would not occur, except at the pits.

- **HDD** – HDD crossings are installed using a drill rig, with the top of the drill rig tilted up at an angle of approximately ten degrees from horizontal. The bore entry holes would be drilled from the starting to the destination pits. In preparing the hole, a small diameter (3-inch-wide) pilot hole would be first drilled in a gentle arc from the drill rig to the destination pit on the other side of the area to be crossed. This pilot hole can be guided using magnetic readings transmitted from the drill bit back to the drill rig. After the initial hole is drilled, the final bore entry pit, approximately 10 ft square by approximately 8 ft deep, would be constructed and used as the collection point for Bentonite drilling mud and drill spoil.

During HDD, drilling mud would be injected into the drill and recovered from the entry hole until the drill bit surfaces at the exit pit. Once the drill bit surfaces, the drilling mud would be recovered at both the entry and exit hole, pumped into tanks and transported back to the rig location for cleaning and eventual reuse. The proposed pipeline would be pulled back through the hole while simultaneously back-reaming the pilot hole (making the hole larger) so it can accommodate the pipeline. Using this technique, the ground surface would not be disturbed except at the pits.

- **Surface Restoration** – After the pipe is installed, the ground surface of the pit areas would be restored. When pipe is installed on paved roadways, the asphalt would be patched and restored to pre-construction conditions.

When the pipe is installed in dirt access roads, the dirt would be graded and compacted. In natural or vegetated areas, native plantings would be installed.

2.4.6 Construction Trip Generation

During construction, the project would generate trips with construction crews and materials deliveries. Construction would generate up to approximately 60 round-trip trips per day, including 6 round trips for off hauling of material, 10 round trips for delivery of materials and mobilization and demobilization of the drill rig, and 43 small vehicle trips for construction worker commuting. Construction would proceed at a rate of approximately 150 linear feet per day and involve approximately 26,200 cubic yards (cy) of material export, assuming as much native fill is reused for backfill of trenches as possible.

2.4.7 Construction Schedule

Construction is anticipated to last 12 months. The project's maximum area of disturbance during the construction period would encompass about 160,000 square feet, or no more than four acres, not including staging areas. The pipelines would be installed at depths of five to six feet below ground surface with a trench width of three to five feet, except the pipelines installed using trenchless techniques. All construction activities would occur within the County of Riverside roadway rights of way and SWS properties. Disturbance activities would occur on existing dirt access roads and in vegetated areas adjacent to the access roads. Disturbed areas would be restored to original grade and vegetated areas would be replanted with the appropriate native species.

Project construction activity is anticipated to occur continuously between the hours of 7:00 a.m. and 6:00 p.m., Monday through Friday only (not on the weekend) and excluding federal holidays, which is compliant with the County of Riverside Ordinance Regulating Noise.

2.4.7.1 Construction Best Management Practices

CVWD would require implementation of the following construction BMPs with the Project:

- *Drainage / Erosion Control* - During the construction, existing storm water facilities including catch basins, manholes, and ditches would be protected using erosion control measures. Design standards outlined in the *Riverside County Whitewater River Region Stormwater Quality Best Management Practice Design Handbook for Low Impact Development* (Riverside County Flood Control and Watershed Conservation District [FCWCD] 2014) would be implemented as applicable to the project site's stormwater drainage features. In addition, the project contractor would be required to obtain a Construction General Permit pursuant to NPDES, which would require development of a construction SWPPP and implementation of best management practices to prevent polluted runoff from leaving the construction site.
- *Groundwater Dewatering* - The proposed pipe would be installed at a depth of five to six feet below ground surface. If encountered at this depth, groundwater would be controlled using standard methods including stone sumps wrapped in filter fabric and dewatering basins or baffled tanks if required.
- *Traffic Controls* - Construction of the proposed project may necessitate individual traffic lane closures. Traffic control requirements would require that emergency crews have access, as needed, and that the contractor coordinates the location of the work daily for routing of emergency vehicles. Traffic control would also require the contractor to make reasonable efforts, wherever possible, to provide landowners access to their property and patrons access to businesses during execution of the work. The contractor may be required to have a County-approved traffic control plan. Refer to mitigation measures **TRA-1 Traffic Control Plan**.

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

2.4.8 Operation and Maintenance

CVWD would continue to operate its domestic water system with no operational modifications. New water meters would be read per established CVWD schedules.

2.5 Permits Required

The Riverside County DEH requires operation permits for mobile home parks located in unincorporated communities. The County’s Department of Building and Safety is responsible for issuing occupancy permits for mobile home parks. All SWSs in the proposed project have either been issued or have finalized their Polanco park / MHP permits with the County of Riverside. Note that some of the existing on-site wells will continue to operate for irrigation purposes and will not be demolished after the proposed project is implemented, and will be determined in collaboration with SWRCB and DEH. **Table 2-4** summarizes the SWSs’ permit statuses as of October 2018.

Table 2-4: SWS Permit Status

Small Water System	Riverside County Permit Status
Manuela Garcia Water	FINAL
Saint Anthony MHP	ISSUED
Seferino Huerta	FINAL

Additionally, the permits listed in **Table 2-5** may be required for project construction.

Table 2-5: Permits and Approvals

Agency	Permit or Approval
Local	
County of Riverside	<ul style="list-style-type: none"> • Encroachment, Road and Construction Permits • Mobile Home Park/Polanco Park Permit • Well Demolition Permit
South Coast Air Quality Management District	<ul style="list-style-type: none"> • Permit to Construct • Fugitive Dust Control Plan
State	
California Department of Transportation (Caltrans)	<ul style="list-style-type: none"> • Encroachment Permit
Regional Water Quality Control Board (RWQCB), Colorado River Region	<ul style="list-style-type: none"> • General Permit for Construction Discharges (dewatering/ test water)
State Water Resources Control Board (SWRCB)	<ul style="list-style-type: none"> • Drinking Water Supply Permit Amendment • Drinking Water Supply Deactivation notification letter • NPDES General Permit for Storm Water Discharges associated with Construction Activities
Federal	
United States Environmental Protection Agency / SWRCB	<ul style="list-style-type: none"> • Funding under the Drinking Water State Revolving Fund
United States Department of Agriculture	<ul style="list-style-type: none"> • Funding under the Rural Development Program

The types of permits necessary to construct the project would be confirmed during the design phase.

3. ENVIRONMENTAL CHECKLIST FORM

1. **Project title:** Saint Anthony Mobile Home Park (MHP) Water Consolidation Project
2. **Lead agency name and address:** Coachella Valley Water District
75515 Hovley Lane East
Palm Desert, CA 92211
3. **Contact person and phone number:** Elizabeth Meyerhoff, Environmental Specialist
Coachella Valley Water District
75515 Hovley Lane East
Palm Desert, CA 92211
(760)398-2651 x 2775
4. **Project location:** The proposed project is located in the eastern Coachella Valley area of Riverside County, California near the community of Mecca. California State Route 111 borders the project area to the east. The project is bounded by Avenue 65 and Avenue 68 on the north and south, respectively. Highway 86 and Whitewater River Stormwater Channel run north-south through the project area. It consists of three parcels: Manuela Garcia Water (APN: 749-090-031); Seferino Huerta (APN: 727-260-016); and Saint Anthony MHP (APN: 727-271-018).
5. **Project sponsor's name and address:** Same as Lead Agency
6. **County of Riverside General Plan designation:** Indian Lands; Very Low Density Residential ; Agriculture
7. **County of Riverside Zoning:** A-1-10; W-2
8. **Description of project:** The Saint Anthony MHP Water Consolidation Project consists of consolidation of three independent small water systems into CVWD's potable water system. The project would deliver 106 acre-feet per year of potable water to meet a maximum day demand of 65.88 gallons per minute. The proposed project would construct approximately 27,000 linear feet of water system laterals within existing roadways or within property currently owned by the small water systems owners.
9. **Surrounding land uses and setting:** The Whitewater River/Coachella Valley Stormwater Channel bisects the proposed project sites. The project area is bordered as follows: North: agricultural land; mixed use, rural residential, and commercial retail; the community of Mecca; East: agricultural and mixed use lands; South: agricultural and rural residential lands; Salton Sea; and West: rural residential and agricultural lands; Torres-Martinez reservation; the community of One Hundred Palms.
10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)**

Local:

 - Riverside County – Encroachment, Road and Construction Permits
 - Riverside County – Mobile Home Park/Polanco Park Permit
 - Riverside County – Well Demolition Permit
 - SCAQMD – Fugitive Dust Control Plan; Permit to Construct

State:

- Caltrans – Encroachment Permit
- Colorado River RWQCB – General Permit for Construction Discharges (dewatering/ test water)
- SWRCB Division of Drinking Water (DDW) - Drinking Water Supply Permit Amendment
- SWRCB DDW - Drinking Water Supply Deactivation notification letter
- SWRCB –NPDES General Permit for Storm Water Discharges associated with Construction Activities

Federal:

- USEPA/SWRCB – funding under the DWSRF
- USDA – funding under the Rural Development Program

11. Have California Native American tribes traditionally and culturally affiliated with the Project area requested consultation pursuant to Public Resources Code section 2180.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

On May 17, 2019, CVWD mailed formal AB 52 consultation letters to the local Native American tribal governments which have previously requested to consult under AB 52. As of June 2019, CVWD environmental staff have received written formal requests for consultation from two tribes. Staff has meet with both tribes to discuss the project. Refer to *Section 3.18 Tribal Cultural Resources* for further discussion.

NAHC identified 19 Native American contacts who may have knowledge of cultural resources of Native American origin at the project site. Rincon prepared and mailed letters to each of these groups on behalf of CVWD on January 22, 2019. On February 20 and 22, 2019, Rincon followed up with the Native American contacts who had not replied. Twelve responses were received from this outreach effort. A summary of each response received as of March 21, 2019 can be found in *Section 3.18*.

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. With adherence to the mitigation program identified within this IS/MND, the potentially significant impacts would be reduced or minimized to a less than significant level.

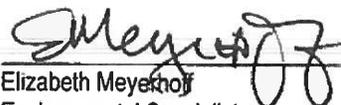
- | | | |
|---|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology / Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards & Hazardous Materials |
| <input checked="" type="checkbox"/> Hydrology / Water Quality | <input 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 checked="" type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION: (To be completed by Lead Agency)

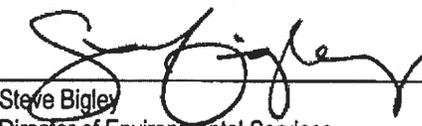
On the basis of this initial evaluation:

- 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:  July 23, 2019
 Jennifer Ziv
 Senior Environmental Planner /Project Manager
 Woodard & Curran
 Date

Reviewed by:  July 23, 2019
 Elizabeth Meyerhoff
 Environmental Specialist
 Coachella Valley Water District
 Date

Reviewed by:  July 23, 2019
 For William Patterson
 Environmental Supervisor
 Coachella Valley Water District
 Date

Submitted by:  July 23, 2019
 Steve Bigley
 Director of Environmental Services
 Coachella Valley Water District
 Date

Environmental Assessment Committee:

Concurrence by:



Sylvia Bermudez
Environmental Assessment Committee Chair
and Clerk of the Board
Coachella Valley Water District

July 23, 2019
Date

General Manager Determination:

Approved by:



J.M. Barrett
General Manager
Coachella Valley Water District

July 23, 2019
Date

3.1 Aesthetics

Except as provided in Public Resources Code Section 21099, would the Project:	<i>Potentially Significant Impact</i>	<i>Less Than Significant With Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

The proposed project is located in unincorporated Riverside County to the west of the unincorporated community of Mecca within the eastern Coachella Valley. The Coachella Valley is relatively flat, surrounded by undeveloped northwest-southeast trending mountainous areas to the east (Mecca Hills and Joshua Tree National Park) and west (Santa Rosa and San Jacinto Mountains). Portions of the eastern Coachella Valley are relatively undeveloped and are composed largely of agricultural lands. The general visual character of the eastern Coachella Valley includes date groves and agricultural uses; desert oasis areas; cove-like communities at the base of the Santa Rosa Mountains; the Whitewater River Stormwater Channel; the Salton Sea State Recreation Area; and desert and mountain vistas (County of Riverside 2014).

There are no designated state scenic highways within the project area. State Route 111, from Bombay Beach on the Salton Sea to Avenue 66 in Mecca, within the project area, is a State-eligible Scenic Highway, providing views of the Salton Sea and the surrounding mountainous wilderness. Interstate 10, located approximately eight miles north of the project area, is a County-eligible Scenic Highway (County of Riverside 2015).

a, c) Less than Significant Impact

The *Riverside County General Plan* (County of Riverside 2015) defines scenic vistas as points accessible to the general public that provide a view of the countryside. The project area is located near the unincorporated community of Mecca in a predominantly undeveloped, agricultural area. The visual character of the project area, as shown in the photo of the Seferino Huerta site to the right, is defined by the relatively level agricultural lands and surrounding mountains which can be seen in the distance from the project area.

The proposed project would construct approximately 27,000 linear feet of pipelines, a pressure reducing station, and associated onsite piping, meters, hydrants and valves to consolidate three independent, privately owned SWS into CVWD's potable water system. Construction of the proposed project would temporarily impact views and the visual character of the project area through placement of large-scale construction equipment along and adjacent to roadways. These construction impacts would be temporary in nature and ground surfaces would be restored to pre-construction conditions upon completion. The majority of project facilities would be located below grade except for minor above grade features such as hydrants, meters and air valves, and would therefore not impact scenic vistas or the visual character or quality of the project area upon completion of construction. Thus, impacts would be less than significant.



View west from Seferino Huerta MH, along Lincoln Ave

b) No Impact

The proposed project is not within view of a State or County designated scenic highway. State Route 111, located within the project area, is recognized as a State-eligible scenic highway. Highway 86 located within the project area is not recognized as a State or County designated or eligible scenic highway. Any potential impacts to scenic resources would be construction-related and temporary in nature. Therefore, the proposed project would not substantially damage scenic resources within a state scenic highway and no impacts would occur.

d) Less than Significant Impact

Construction of the proposed project may create a temporary source of light from construction equipment parked onsite and potentially security lighting at staging areas, but the impact would cease upon completion of construction. The proposed project would not create any new source of light or glare following construction because the project does not include the introduction of permanent lighting; and therefore the proposed project would not create a new source of light or glare that would adversely affect day or nighttime views within the project area and no impacts would occur.

Mitigation Measures: None required or recommended.

3.2 Agriculture and Forestry Resources

Would the Project:	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

The project area is composed primarily of agricultural land and also includes major roadways, low density residential developments and the Whitewater River/Coachella Valley Stormwater Channel. According to the California Department of Conservation (DOC 2019) and shown in **Figure 3-1**, a large portion of the project vicinity is composed of important farmland, including prime farmland and farmland of local importance. The Manuela Garcia MHP is designated as “other land” but is surrounded to the west, south, and east by farmland of local importance and to the north by Prime Farmland. The Saint Anthony MHP is designated as “urban and built-up land and is surrounded by “other land” and the Seferino Huerta MHP is designated as and surrounded by farmland of local importance. Per DOC mapping of Williamson Act enrolled lands, and shown in **Figure 3-2**, the project area is not located on lands protected by a Williamson Act contract, although parcels within the vicinity of the project area are covered by a Williamson Act contract (DOC 2016).

The California Department of Forestry and Fire Protection (Cal Fire) published maps (Cal Fire 2006) which classifies land cover throughout the state into eight major forest or range-related classes, including Forestland - Conifer Forest, Forestland - Hardwood Forest, Forest and Rangeland - Conifer Woodland, Forest and Rangeland - Hardwood Woodland, Rangeland - Shrub, Rangeland - Desert, Rangeland - Herbaceous, and Rangeland - Wetland. Cal Fire also classifies land cover throughout the state into four non-forest and rangeland classes including Urban, Barren/Other, Water, and Agriculture. The project area is primarily designated as Agriculture with small pockets of Urban land (Cal Fire 2006). There are no designated forest lands within the project area.

Figure 3-1: Important Farmland Map

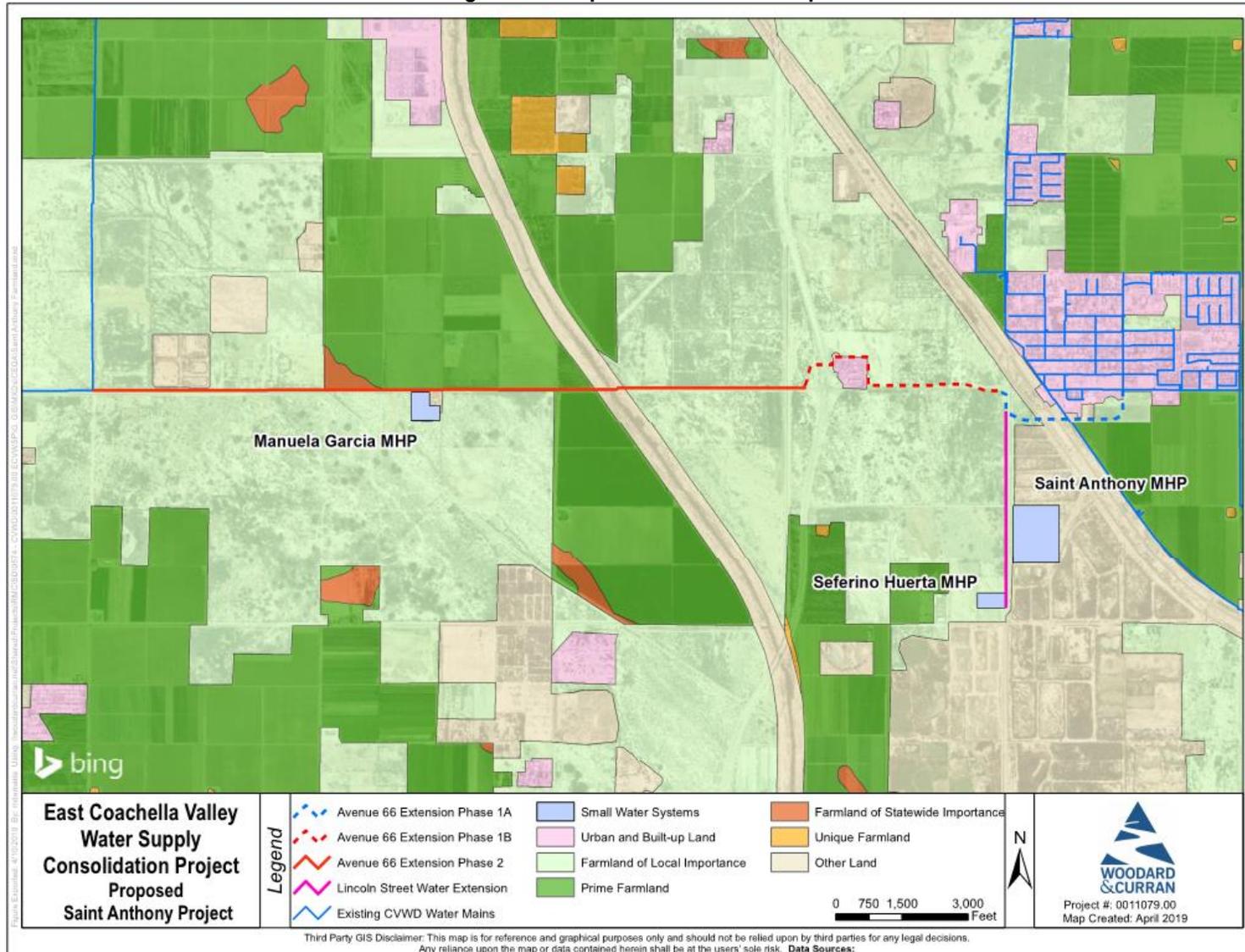
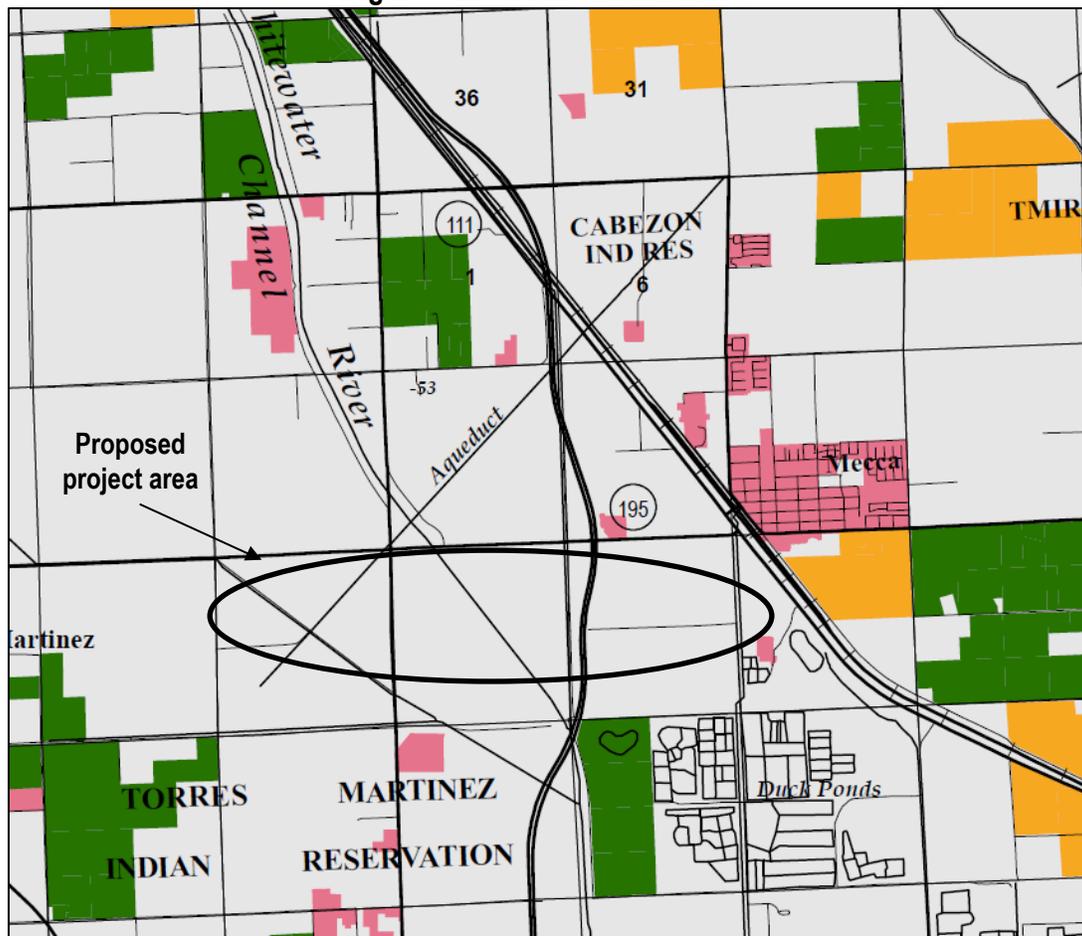


Figure 3-2: Williamson Act Lands



Notes: Green color indicates Williamson Act-Prime Agricultural land; yellow color indicates Williamson Act-nonrenewal land; pink color indicates urban and built up land.

Source: California Department of Conservation Division of Land Resource Protection Conservation Program Support, "Riverside County Williamson Act FY 2015/16 Sheet 2 of 3," 2016.

a, b, e) Less than Significant Impact

A majority of the project area outside of the public right-of-way is mapped as important farmland, including prime farmland and farmland of local importance. The proposed project would construct approximately 27,000 linear feet of pipelines, a pressure reducing station, and onsite improvements to consolidate three independent, privately owned SWS into CVWD's potable water system. The proposed project would be constructed within roadway rights-of-way, as well as on privately owned properties to connect CVWD's potable water system to the properties. The majority of the proposed project components would be located below-grade and ground surfaces would be restored to pre-construction conditions. The proposed project would not result in land use changes and would, therefore, not convert important farmland to a non-agricultural use, conflict with zoning regulations, or result in other changes that could indirectly result in conversion of nearby farmland to non-agricultural use. There are Williamson Act lands within proximity to the project area, however, the proposed project would not directly impact Williamson Act contracted lands because the land use and zoning of those lands. Therefore, impacts to important farmland and Williamson Act contracted lands would be less than significant and no mitigation is required.

c, d) No Impact

There are no forest lands or timberlands within the project area. Therefore, there would be no conflict with zoning or loss or conversion of forest land or timberland. No impacts to forest land or timberland would occur and no mitigation is required.

Mitigation Measures: None required or recommended.

3.3 Air Quality

	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
Would the Project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

The East Coachella Valley is bounded by the Santa Rosa Mountains to the west, and the Mecca Hills and the edge of Joshua Tree National Park to the northeast. The project area is located in the Coachella Valley region of the Salton Sea Air Basin (SSAB). The Coachella Valley region is under the regulatory jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD monitors air pollutant levels to ensure the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) are met and, if they are not met, to develop strategies to meet the standards. Air pollution in the project area is monitored at stations located in Palm Springs and Indio.

The NAAQS, which are required to be set by the United States Environmental Protection Agency (US EPA) under the Clean Air Act, provide public health protection, including protecting the health of sensitive populations such as asthmatics, children, and the elderly (US EPA 2019). Similarly, the CAAQS are established to protect the health of the most sensitive groups and are mandated by State law. US EPA has set NAAQS for six pollutants, which are called "criteria pollutants": Carbon Monoxide (CO), Lead (Pb), Nitrogen Dioxide (NO₂), Ozone (O₃), Particulate Matter (PM₁₀ and PM_{2.5}), and Sulfur Dioxide (SO₂). California has added three additional criteria pollutants: Hydrogen Sulfide (H₂S), Visibility Reducing Particles, and Vinyl Chloride. In addition, California regulates about 200 different chemicals, referred to as toxic air contaminants (TACs) (CARB 2019).

Depending on whether or not the NAAQS or CAAQS are met or exceeded, the SSAB is classified as being in “attainment” or “nonattainment.” The 2016 Air Quality Management Plan (AQMP; SCAQMD 2017) assesses the attainment status of the Coachella Valley portion of the SSAB. The NAAQS and CAAQS attainment statuses for the Coachella Valley portion of the SSAB are listed in **Table 3-1**. As shown therein, the SSAB is in nonattainment for the State standards for 1-hour ozone, nonattainment for both the federal and State standards for 8-hour ozone, and nonattainment for respirable particulate matter, PM₁₀ (SCAQMD 2017). Thus, the Coachella Valley portion of the SSAB is required to implement strategies that would reduce pollutant levels to recognized standards. The AQMP provides a strategy for the attainment of State and federal air quality standards.

Table 3-1: Criteria Pollutant Attainment Status - Coachella Valley Portion of the Salton Sea Air Basin

Pollutant	State (CAAQS)	Federal (NAAQS)
O ₃ – 1-hour	Nonattainment (0.09 ppm)	Attainment (0.12 ppm)
O ₃ – 8-hour	Nonattainment (0.070 ppm)	Pending – Expect Nonattainment (Severe) (0.070 ppm)
PM ₁₀ – 24-hour	Nonattainment (50 µg/m ³)	Nonattainment (Serious) (150 µg/m ³)
PM ₁₀ – Annual	Nonattainment (20 µg/m ³)	--
PM _{2.5} – 24-hour	--	Unclassifiable/ Attainment (35.0 µg/m ³)
PM _{2.5} – Annual	Attainment (12.0 µg/m ³)	Unclassifiable/ Attainment (12.0 µg/m ³)
CO	Attainment (1-hour [20 ppm]; 8-hour [9 ppm])	Unclassifiable/ Attainment (1-hour [35 ppm]; 8-hour [9 ppm])
NO ₂	Attainment (1-hour [0.18 ppm]; annual [0.030 ppm])	Unclassifiable/ Attainment (1-hour [0.10 ppm]; annual [0.053 ppm])
SO ₂	Attainment (1-hour [0.25 ppm]; 24-hour [0.04 ppm])	Unclassifiable/ Attainment (1-hour [75 ppb]; 24-hour [0.14 ppm]; annual [0.03 ppm])
Lead	Attainment (30-day average [1.5 µg/m ³])	Unclassifiable/ Attainment (3-months rolling [0.15 µg/m ³])
Sulfates	Attainment (24-hour [25 µg/m ³])	--
H ₂ S	Unclassified (1-hour [0.03 ppm/42 µg/m ³])	--

Source: SCAQMD 2017; CARB 2016; SCAQMD 2016.

The SCAQMD provides numerical thresholds to analyze the significance of a project’s construction and operational emissions on regional air quality. These thresholds are designed such that a project consistent with the thresholds would not have an individually or cumulatively significant impact on the SSAB’s air quality. These thresholds are listed in **Table 3-2**.

Table 3-2: SCAQMD Air Quality Significance Thresholds for Coachella Valley

Pollutant	Mass Thresholds	
	Construction Thresholds (pounds/day)	Operation Thresholds (pounds/day)
NO _x	100	100
ROG	75	75
PM ₁₀	150	150
PM _{2.5}	55	55
SO _x	150	150
CO	550	550
Lead	3	3
TACs	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
GHG	10,000 MT/yr CO ₂ e for industrial facilities	
Notes: (1) NO _x (oxides of nitrogen) and ROG (reactive organic gases)/VOC (volatile organic compounds) are ozone precursors, which chemically react in the presence of sunlight to form ground-level ozone. (2) For Coachella Valley, the mass daily thresholds for operation are the same as the construction thresholds. Source: SCAQMD 2015.		

In addition, the SCAQMD has developed Localized Significance Thresholds (LSTs) in response to concern regarding exposure of individuals to criteria pollutants in local communities. LSTs have been developed for nitrogen oxides (NO_x), CO, PM₁₀ and PM_{2.5}. LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or State ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area, distance to the sensitive receptor, and project size. LSTs only apply to emissions within a fixed stationary location; they are not applicable to mobile sources. The use of LSTs is voluntary, to be implemented at the discretion of local agencies (SCAQMD 2008).

The SCAQMD LSTs are defined for 37 source receptor areas (SRAs). The project site is located in source receptor area 30 (SRA-30), Coachella Valley (SCAQMD 2008). LSTs have been developed for emissions within construction areas up to five acres in size. The SCAQMD provides lookup tables for sites that measure up to one, two, or five acres. The footprint of the proposed project would be approximately four acres. However, construction of the pipelines would not occur over the entire four acres continuously. Instead, construction of the proposed project would proceed at a rate of approximately 150 linear feet of pipeline per day, which is equivalent to an active construction site less than one-tenth of an acre per day. Pursuant to SCAQMD guidance, LSTs for the one-acre site should be used for sites that are less than one acre in size. On occasion, ground disturbance for the proposed project may exceed the estimated rate of 150 LF/day and the equivalent 0.1 acre per day; however, in no case would the area under active construction at any given time exceed the one acre limit set in the LST lookup table. LSTs for construction on a one-acre site in SRA-30 are shown in **Table 3-3**. LSTs are provided for receptors at a distance of 25 meters (82 feet) from the project site boundary, which is the most conservative LST distance (LSTs range from 25 to 500 meters). The closest sensitive receptors to the project site are the residences located adjacent to the proposed pipelines.

Table 3-3: SCAQMD LSTs for Construction and Operation

Pollutant	Allowable emissions from a one-acre site in SRA-30 for a receptor within 25 meters, or 82 feet (pounds/day)
Gradual Conversion of NO _x to NO ₂	132
CO	878
PM ₁₀ - operation	1
PM ₁₀ - construction	4
PM _{2.5} - operation	1
PM _{2.5} - construction	3
Source: SCAQMD, Final LST Methodology Document, Appendix C – Mass Rate LST Look-up Tables, Revised October 2009.	

General Conformity with state implementation plans is a national Clean Air Act regulation that applies to most federal actions. For Drinking Water State Revolving Fund (DWSRF) funded projects, a Clean Air Act General Conformity analysis applies only to projects in a nonattainment area or an attainment area subject to a maintenance plan. It is only required for criteria pollutants for which an area has been designated nonattainment or maintenance. The General Conformity Rule ensures that actions taken by federal agencies in nonattainment and maintenance areas do not interfere with the State’s plans to meet NAAQS. 40 CFR Part 93.153 defines de minimis levels, which are the minimum threshold for which a conformity determination must be performed. If the proposed project’s annual emissions from construction and/or operation are below the applicable de minimis levels, the project is not subject to a General Conformity determination.

Based on the federal attainment statuses for the SSAB, the de minimis levels that apply to the SSAB are listed in **Table 3-4**. These levels apply to all direct and indirect annual emissions generated during construction and operation of the project.

Table 3-4: General Conformity De Minimis Emission Rates for the Salton Sea Air Basin

Pollutant	SSAB NAAQS Attainment Status Designation	De Minimis Emission Rate (tons/year)
Ozone (VOCs or NO _x)	Severe Nonattainment	25
PM ₁₀	Serious Nonattainment	70
Note: NO _x (oxides of nitrogen) and ROG (reactive organic gases)/VOC (volatile organic compounds) are ozone precursors, which chemically react in the presence of sunlight to form ground-level ozone. For the purposes of this analysis, the terms ROG and VOC are used interchangeably. Sources: USEPA 2017; SCAQMD 2017.		

a) Less than Significant Impact

The SCAQMD’s 2016 AQMP, which assesses the attainment status of the Coachella Valley portion of the SSAB and provides a strategy for attainment of State and federal air quality standards, is the applicable air quality plan. The AQMP strategies are developed based on population, housing, and employment growth forecasts anticipated under local city general plans and the Southern California Association of Governments’ (SCAG) 2016 *Regional Transportation Plan/Sustainable Communities Strategy* (SCAG, 2016).

A project would conflict with or obstruct an applicable air quality plan if it would lead to population, housing or employment growth that exceeds the forecasts used in the development of the applicable air quality plan. The proposed project would construct approximately 27,000 linear feet of pipelines, a pressure reducing station, and associated onsite piping, meters, hydrants and valves to consolidate three independent, privately owned SWSs into CVWD’s

potable water system. Although the proposed project would expand CVWD’s municipal water delivery infrastructure, it would serve a pre-determined number of existing communities, which currently rely on SWSs, with a reliable potable water source from CVWD’s municipal water system. The Phase 1a, 1b, 2 and Lincoln Street water mains were described in the UWMP and would serve growth that was planned for in local growth forecasts. Therefore, the proposed project would not lead to population, housing or employment growth that exceeds the forecasts used in the development of the AQMD. Potential for conflicts with the AQMP would be less than significant.

b) Less than Significant Impact

The proposed project would result in emissions of criteria pollutants from short-term construction activities and long-term O&M activities. Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod 2016.3.2), which was developed by the SCAQMD and is used throughout California to quantify criteria pollutants and greenhouse gas emissions (GHGs).

The CalEEMod emissions scenarios were based on project-specific information, found in Section 2 *Project Description*. In instances where project-specific information was not available (e.g. construction equipment horsepower, length of worker trips, soil moisture content), the analysis relied on CalEEMod default values for construction activities.

SCAQMD’s Rule 403 (Fugitive Dust) and Rule 403.1 (Supplemental Fugitive Dust Control Requirements for Coachella Valley Sources) require construction projects to implement measures to suppress fugitive dust emissions, such as watering of exposed soils and the preparation of a Fugitive Dust Control Plan. The construction contractor would be required to have a Fugitive Dust Control Plan approved by either the SCAQMD or Riverside County prior to grading or excavation activities.

Construction Emissions

Air emissions of criteria pollutants during construction would result from the use of construction equipment with internal combustion engines, and offsite vehicles to transport workers, deliver materials to the site, and haul export material from the site. Project construction would also result in fugitive dust emissions, which would be lessened through the implementation of the fugitive dust control measures required by SCAQMD rules. **Table 3-5** summarizes the maximum daily pollutant emissions during construction of the project.

Table 3-5: Proposed Project Maximum Daily Construction Emissions (lbs/day)

Emissions Source	NO _x	ROG	CO	SO _x	PM _{2.5}	PM ₁₀
Construction equipment	36	4	40	<0.1	1.8	2.0
Offsite emissions	2	<1	4	<0.1	0.3	1.1
Fugitive dust (with required fugitive dust controls)	--	--	--	--	<0.1	<0.1
Total Maximum Daily Emissions	38	4	43	<0.1	2.1	3.1
<i>SCAQMD Regional Thresholds</i>	<i>100</i>	<i>75</i>	<i>550</i>	<i>150</i>	<i>55</i>	<i>150</i>
Threshold exceeded?	No	No	No	No	No	No
<i>LST (onsite stationary emissions only)</i>	<i>132</i>	<i>--</i>	<i>878</i>	<i>--</i>	<i>3</i>	<i>4</i>
Threshold exceeded?	No	No	No	No	No	No

Notes: Emissions presented are the highest of winter or summer modeled emissions. Values may not sum due to rounding. See Appendix A for CalEEMod output sheets. Figures are from mitigated emissions scenario to account for standard dust control measures.

As shown in **Table 3-5**, project construction emissions would not exceed SCAQMD regional thresholds or LSTs. Therefore, impacts on regional air quality and local receptors due to construction-related air pollutant emissions would be less than significant.

Operational Emissions

Long-term, operational emissions of criteria pollutants would result from motor vehicle trips associated with O&M of the proposed pipelines. However, as explained in *Chapter 2 Project Description*, CVWD would continue to operate its water system with no operational modifications. New water meters would be read per established CVWD schedules. Thus, the project would not result in a change in existing O&M activities. The project does not propose stationary infrastructure, such as buildings or pump stations, that would substantially increase demand for electricity or natural gas; energy consumption from the proposed meters and hydrants would be minimal. The LSTs do not apply to the proposed project because they are only applicable to emissions within a fixed stationary location; they are not applicable to mobile sources. Overall, the project would offset energy currently used to pump and treat water supplied by the SWSs. Operation and maintenance emissions associated with the pipelines would be negligible. Because emissions would be minimal, the proposed project would not result in a cumulatively considerable net increase of a criteria pollutant for which the SSAB is non-attainment. Operational increase in criteria pollutants would be less than significant.

General Conformity Assessment

Table 3-6 summarizes the proposed project’s total annual construction emissions and compares those to the applicable de minimis threshold for the SSAB region. As shown in **Table 3-6**, the project’s criteria air pollutant emissions would not exceed the applicable de minimis thresholds. Therefore, the general conformity requirements do not apply to these emissions and the project is exempt from a conformity determination.

Table 3-6: Maximum Annual Project Emissions Compared to De Minimis Thresholds (tons/year)

Emissions Source	NO _x	VOC	PM ₁₀
Maximum construction emissions	4	<1	<1
<i>De Minimis Threshold</i>	25	25	70
Threshold exceeded?	No	No	No
Notes: Notes: NO _x (oxides of nitrogen) and ROG (reactive organic gases)/VOC (volatile organic compounds) are ozone precursors, which chemically react in the presence of sunlight to form ground-level ozone. For the purposes of this analysis, the terms ROG and VOC are used interchangeably. Sources: USEPA 2017; SCAQMD 2017.			

c) Less than Significant Impact

Sensitive receptors are typically defined as schools (preschool – 12th grade), hospitals, resident care facilities, senior housing facilities, day care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. Land uses on the SWS sites include both mobile homes and single-family residences. The Mecca Elementary School is located approximately one-half mile to the northeast of the project area, the Saul Martinez Elementary School is located approximately one mile to the east of the project area, and the Las Palmitas Elementary School, Toro Canyon Middle School, and Desert Mirage High School are located approximately 1.5 miles to the west of the project area.

As discussed under “b” above, the project’s construction and operational emissions would not exceed the SCAQMD regional thresholds or LSTs, which are set at levels that protect public health. Furthermore, construction emissions would be temporary and would not be located in the same location for the entire 12-month construction period. Sensitive receptors would be exposed to temporary construction air pollution emissions while adjacent pipelines are being actively installed. However, emissions would be less than applicable thresholds and mitigation would not be required.

CO hotspots have the potential to occur in traffic-congested roadways and intersections with poor circulation. The proposed project would involve minimal O&M trips. Furthermore, construction-related CO emissions would be below

SCAQMD regional and LST thresholds. Therefore, the project would not have the potential to cause a CO hotspot on roadways adjacent to sensitive receptors. Project impacts on sensitive receptors would be less than significant.

d) Less than Significant Impact

The project would involve emissions of sulfur compounds from use of oil and diesel fuel during construction, which would potentially result in unpleasant odors. Construction would be temporary and would not be located in a single location for the duration of the 12-month construction period. Odorous emissions from construction equipment tend to dissipate quickly within short distances from the construction site. Once the project is operational, the underground potable water pipelines pressure reducing station, and associated onsite piping, meters, hydrants and valves would not be associated with odors. Impacts would be less than significant.

Mitigation Measures: None required or recommended.

3.4 Biological Resources

	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
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 type="checkbox"/>	<input checked="" 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, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

A Biological Resources Technical Study was prepared in February 2019 by Rincon Consultants, Inc. for the project. A field survey of the project area and associated biological resources was conducted by Rincon biologists on February 12, 2019. The complete Biological Resources Technical Study is provided in **Appendix B**. The study area covered by the *Biological Resources Technical Study* is shown **Figure 3-3** and **Figure 3-4**.

Biological conditions in the project area were evaluated by confirming applicable biological regulations, policies, and standards; reviewing biological literature pertinent to the site and vicinity; and conducting a reconnaissance-level biological survey of the site. Rincon conducted a literature review to obtain baseline information about the biological resources with potential to occur at the project site and surrounding areas. As part of the literature review, Rincon reviewed the latest versions of the California Department of Fish and Wildlife (CDFW) *California Natural Diversity Data Base* (CNDDDB) and *Biogeographic Information and Observation System*, U.S. Fish and Wildlife Service (USFWS) *Critical Habitat Portal and Information for Planning and Consultation* (IPaC), USFWS *National Wetland Inventory*, U.S. Department of Agriculture Natural Resources Conservation Service (NRCS) *Web Soil Survey*, and California Native Plant Society's (CNPS) *Electronic Inventory of Rare and Endangered Plants* (Rincon 2019). A complete list of special status species previously documented within a five-mile radius of the project site was compiled from the CNDDDB and USFWS-IPaC queries.

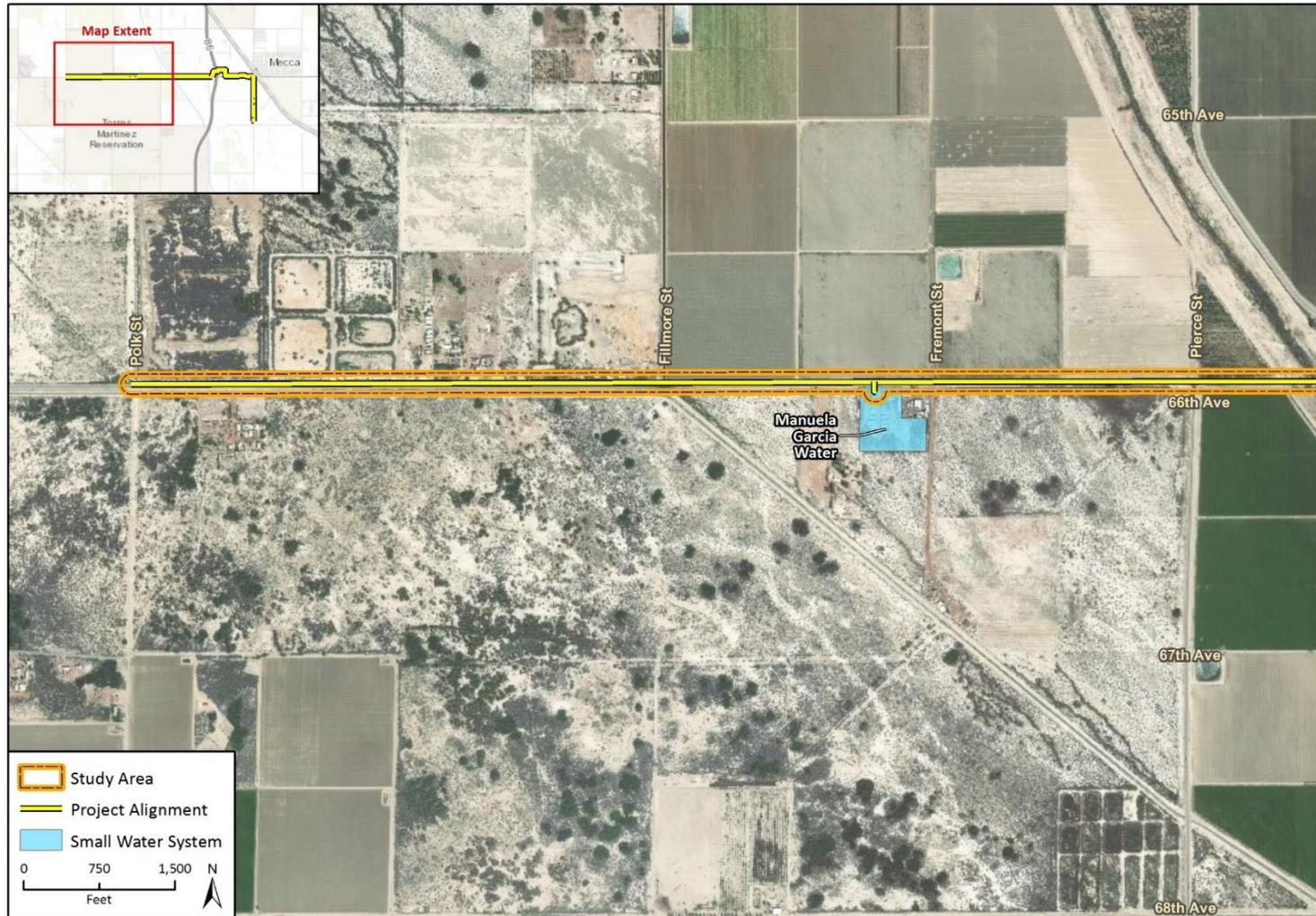
The project site, as well as a 100-foot buffer around the project site, was surveyed on foot by biologists familiar with the biological resources located in the regional vicinity of the property. Inaccessible private property was surveyed using binoculars. **Figure 3-3** and **Figure 3-4** show the study area boundary. An inventory of all plant and animal species observed was compiled, the existing vegetation communities were further classified, and the general site and habitat conditions were documented and provided in Appendix C of the Biological Resources Technical Study which is included as **Appendix B** to this IS/MND.

The project is located within the *Coachella Valley Multiple Species Habitat Conservation Plan* (CVMSHCP) area. The CVMSHCP, which was approved in 2008, is a comprehensive, multi-jurisdictional habitat conservation plan focusing on the conservation of species and their associated habitats in the Coachella Valley region of Riverside County. The overall goal of the CVMSHCP is to maintain and enhance biological diversity and ecosystem processes within the region while allowing for future economic growth (CVAG 2007). CVWD is a permittee under the CVMSHCP.

The CVMSHCP covers 27 sensitive plant and wildlife species (CVMSHCP covered species) as well as 27 natural communities and includes 21 conservation areas. Covered species include both listed and non-listed species that are adequately conserved by the CVMSHCP. The overall provisions for the plan are subdivided according to specific resource conservation goals that have been organized according to geographic areas, or Conservation Areas. These are identified as Core, Essential, or Other Conserved Habitat for sensitive plant, invertebrate, amphibian, reptile, bird, and mammal species, Essential Ecological Process Areas, and Biological Corridors and Linkages.

As shown in **Figure 3-5**, the project is located within the planning boundary of the CVMSHCP and a small portion lies within the *Coachella Valley Stormwater Channel and Delta CVMSHCP Conservation Area* boundary. The portion of the site within the Conservation Area is the fenced interior of the Seferino Huerta MHP Park. Additional portions of the St. Anthony MHP along 66th Avenue and Lincoln Street are directly adjacent to the *Coachella Valley Stormwater Channel and Delta CVMSHCP Conservation Area*.

Figure 3-3: Biological Resources Study Area, page 1

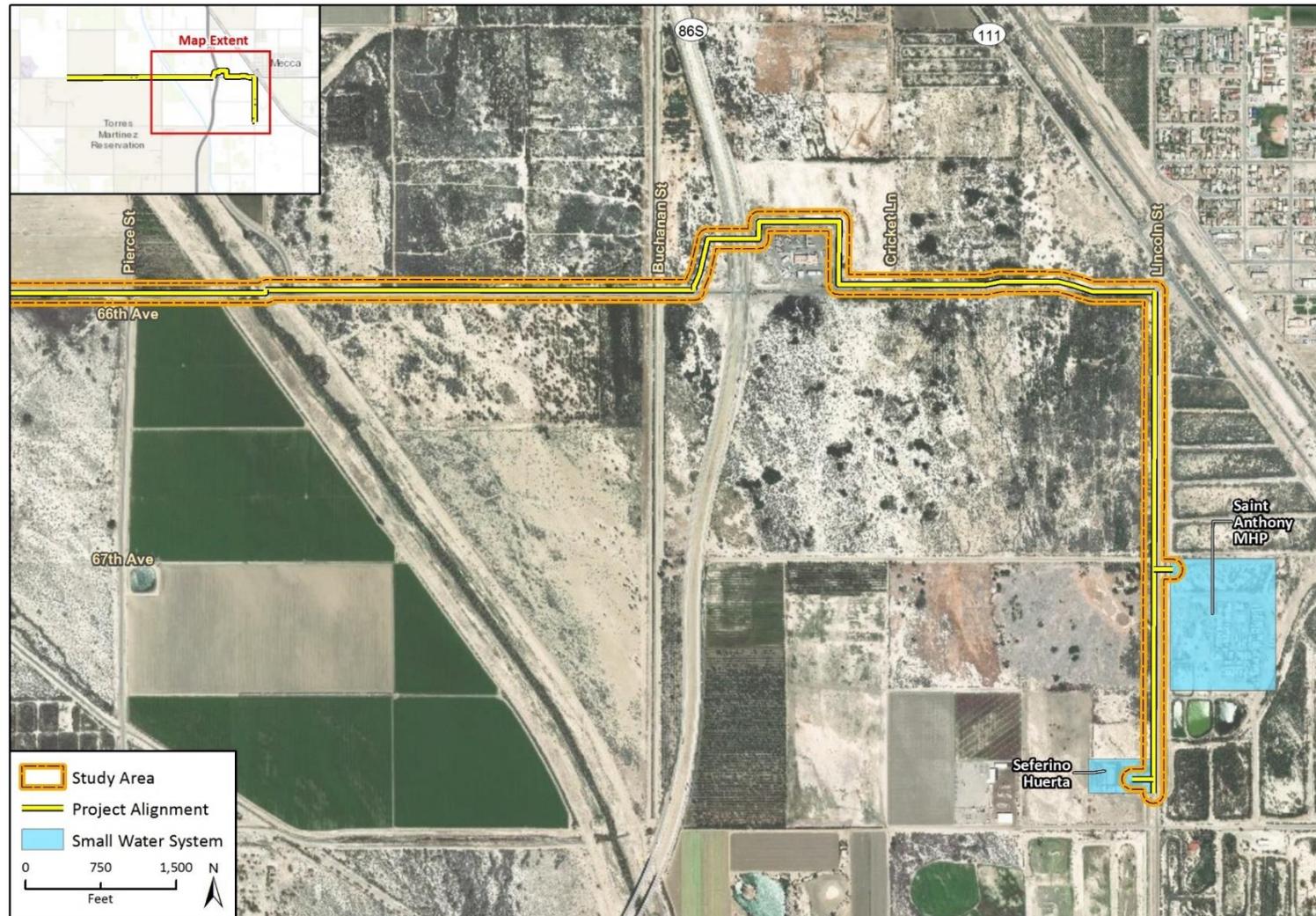


Imagery provided by Microsoft Bing and its licensors © 2019.
 Additional data provided by CVWD 2019.

Fig 2a Project Location - St Anthony

Source: Rincon 2019

Figure 3-4: Biological Resources Study Area, page 2

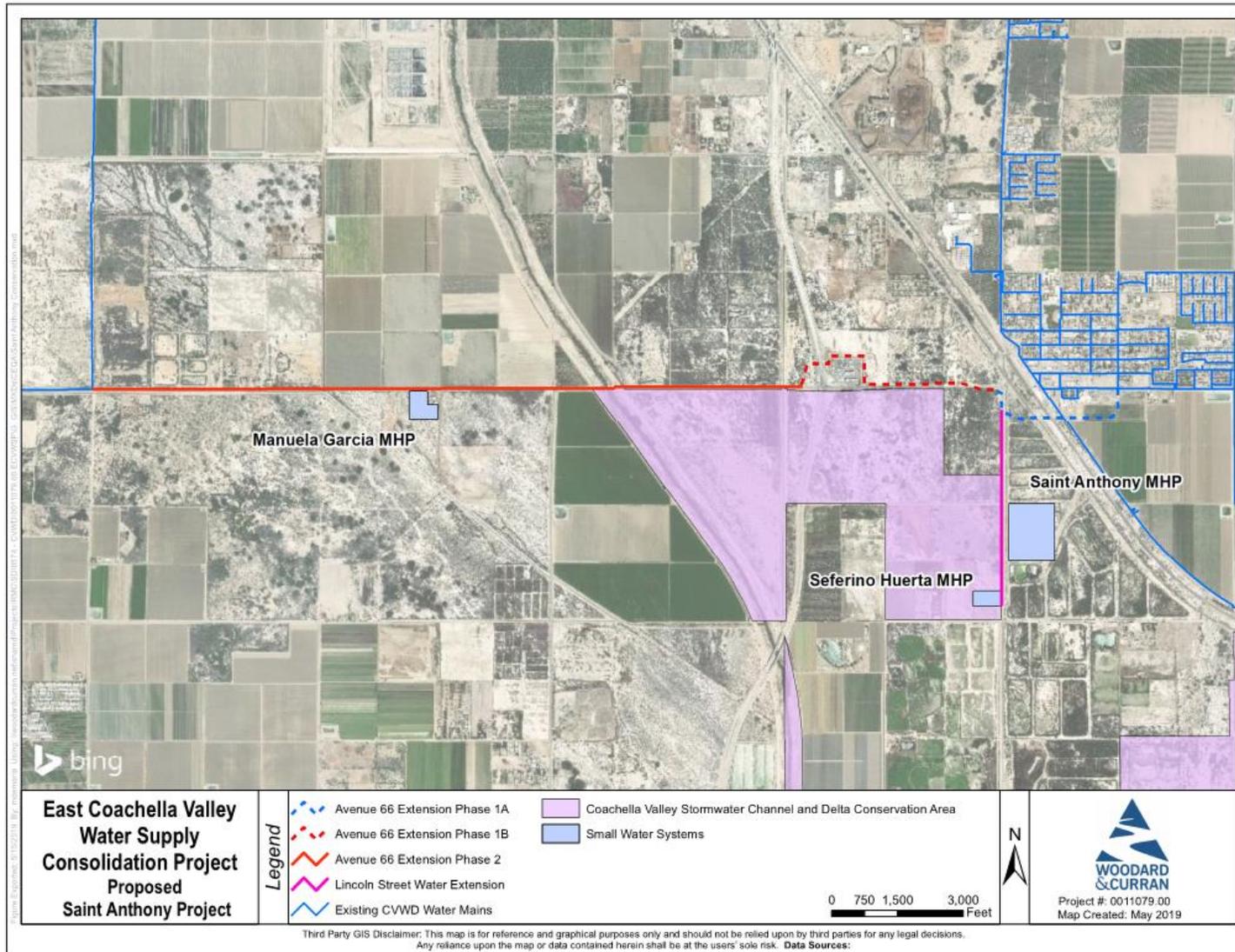


Imagery provided by Microsoft Bing and its licensors © 2019.
Additional data provided by CVWD 2019.

Source: Rincon 2019

Fig 2b Project Location - St Anthony

Figure 3-5: Coachella Valley Stormwater Channel and Delta CVMSHCP Conservation Area



Habitat/Vegetation Communities

The majority of the project alignment is within developed urban and agricultural areas. The vegetation communities within the project area include tamarisk scrub, agriculture, disturbed/ruderal, and developed. Tamarisk scrub is dominated by the non-native and highly invasive tamarisk (*Tamarix* spp.) This weedy plant community is usually a monoculture of tamarisk that has supplanted native wetland plant species. Tamarisk usually invades following disturbance. Within the project area, this vegetation community typically occurs in washes and areas subject to runoff from irrigation waters. Disturbed or ruderal habitat consists of areas that have been physically disturbed and are no longer recognizable as a native or naturalized vegetation association but continue to retain a soil substrate. Within the project area, this habitat type is dominated by Russian thistle (*Salsola tragus*), a variety of thistles from the Centaurea, Cynara, and Carduus genera, mustards (*Brassica* spp., *Hirschfeldia incana*, *Sisymbrium* spp.), and non-native grasses (*Bromus* spp., *Schimus* spp.).

Agricultural areas within the project area include active farmland supporting a variety of crops including dates and lettuce. Agricultural areas also include pastureland and fallow cropland. These areas are usually tilled/disked regularly, irrigated, and are subject to regular planting and harvesting. Developed areas within the project area include mobile home parks, paved and dirt roads, and other buildings and paved areas. Mobile home parks within the project area contain ornamental trees and shrubs such as eucalyptus (*Eucalyptus* spp.), palm trees (*Washingtonia* spp., *Phoenix dactylifera*), and oleander (*Nerium oleander*).

Wildlife

The project site and surrounding areas provide habitat suitable for wildlife species that commonly occur in southern California suburban areas. Wildlife observed on or adjacent to the site included bird species such as American crow (*Corvus brachyrhynchos*), mourning dove (*Zenaida macroura*), Anna's hummingbird (*Calypte anna*), snowy egret (*Egretta thula*), northern mocking bird (*Mimus polyglottos*), and common raven (*Corvus corax*). Coyoter (*Canis latrans*) scat, as well as some lizards and small animal burrows were observed within disturbed/ruderal areas.

Special Status Plants

While 27 special status plant species have been previously documented within a five-mile radius of the project area by the CNDDDB and USFWS-IPaC, the project site does not contain suitable habitat for any special status species. The project site is not anticipated to be suitable to support special status plant species due to the disturbance history of the site, lack of suitable soils, inappropriate hydrologic conditions, absence of appropriate vegetation communities, or being outside the elevation range of the species.

Plant communities are considered sensitive biological resources if they have limited distributions, have high wildlife value, include sensitive species, or are particularly susceptible to disturbance. USFWS-IPaC includes federally listed plant species and (if designated) critical habitat According to the CNDDDB and USFWS-IPaC, no sensitive plant species or communities have been tracked within a five-mile radius of the project area.

Special Status Wildlife

Rincon evaluated 26 wildlife species for their potential to occur within the project area. The assessment of the potential for these species to occur is based upon the presence of suitable habitat as identified during field surveys and existing knowledge of species occurrences and distributions in the region. The site was determined to contain marginally suitable habitat for western yellow bat (*Lasiurus xanthinus*) and western mastiff bat (*Eumops perotis californicus*). Accordingly, these species have moderate potential to occur within the project area. Western yellow and western mastiff bat could roost in trees adjacent to the project site. Burrowing owl (*Athene cunicularia*) was determined to have low potential to occur in the project area, although some elements of suitable habitat exist in the unpaved portions of

the site, particularly along irrigation levees. However, the only recent occurrence (within last 15 years) was recorded more than 3 miles southeast of St. Anthony's project site. No special status wildlife species were observed within the project area during the field survey.

The project area provides suitable habitat for nesting or migratory bird species, which area protected by the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code Section 3503 and 3503.5. The project area provides suitable habitat for numerous species of birds common in the area and nesting birds are likely to be present within the project area during the nesting season.

Jurisdictional Resources

Section 404 of the federal Clean Water Act establishes a program to regulate the discharge of dredged or fill materials into "waters of the United States." Section 404 permits are administered by the U.S. Army Corps of Engineers (USACE). Section 401 of the Clean Water Act further regulates the discharge of dredged or fill materials and is administered in California by the SWRCB and Regional Water Quality Control Boards (RWQCBs). CDFW's Lake and Streambed Alteration Program (Fish & Game Code Section 1600) is focused on protection and conservation of fish and wildlife resources within the bed, channel, and bank of "waters of the State." Areas potentially subject to USACE, RWQCB, and CDFW jurisdiction were assessed during the literature review and field survey (demonstrated on **Figures 3-3 and 3-4**).

The Whitewater River/Coachella Valley Stormwater Channel¹ (which bisects Avenue 66 east of Pierce Street), the agricultural drain south of Avenue 66 at Lincoln Street, and the agricultural drain south of Avenue 66 at Buchanan Street were evaluated for USACE, RWQCB, and CDFW jurisdiction. CVWD routinely maintains the Whitewater River/Coachella Valley Stormwater Channel and its agricultural drains in order for each system to function. The Whitewater River/Coachella Valley Stormwater Channel is a direct tributary to the Salton Sea, which is considered a Traditionally Navigable Water by the USACE. The Whitewater River/Coachella Valley Stormwater Channel is considered jurisdictional for all three regulatory agencies – USACE, RWQCB, and CDFW. If trenchless technologies are used for the Whitewater River/Coachella Valley Stormwater Channel crossing, and no discharge of dredged or fill materials occurs within the channel, then Section 404 (USACE) and Section 401 (RWQCB) jurisdiction under the Clean Water Act would not apply. If trenchless methods are used for the Whitewater River/Coachella Valley Stormwater Channel crossing, and no impacts to species from vibration or potential for release of bentonite through the soil column into a waterbody (called frac-out) occurs, then CDFW would not require a Lake and Streambed Alteration Agreement under Fish & Game Code Section 1600.

¹ The Whitewater River Stormwater Channel and the Coachella Valley Stormwater Channel (Whitewater River/Coachella Valley Stormwater Channel) system follows a gentle slope from northwest to southeast, with the headwaters forming in the San Bernardino Mountains near Palm Springs and terminating at the Salton Sea. The Whitewater River/Coachella Valley Stormwater Channel is the 50-mile backbone stormwater protection system for the Coachella Valley. The western half of the channel runs along the natural alignment of the Whitewater River, which cuts diagonally across the valley to Point Happy in La Quinta (near Highway 111 and Washington Street). This section of the channel is called the Whitewater River Stormwater Channel. Downstream from Point Happy, a man-made section of the stormwater channel conveys floodwaters to the Salton Sea. This portion of the channel is called the Coachella Valley Stormwater Channel. The two sections were built separately, but they form one continuous channel. The Whitewater River/Coachella Valley Stormwater Channel is a regional flood conveyance system, and also receives subsurface drainage from agricultural lands, rising groundwater, wastewater from treatment plants, and urban runoff.

Under CWA Section 404(f), activities involving the discharge of dredged or fill material into waters of the United States associated with the “irrigation of crops or livestock watering as part of a normal farming or ranching operation” are not subject to regulation under Section 404. As such, the two agricultural drains at Avenue 66/Lincoln and Avenue 66/Buchanan are exempt from USACE and RWQCB jurisdiction. The agricultural drains are artificially created with no riparian vegetation and are not maintained by natural surface flow; however, they are likely to fall under CDFW jurisdiction because they convey surface water and have hydrologic connection to natural surface flow that might support species. For either jack and bore or HDD trenchless crossings under the agricultural drainage channels that does not result in impacts to species from vibration or frac-out, CDFW would not require a Lake and Streambed Alteration Agreement under Fish & Game Code Section 1600.

Wildlife Corridors, Linkages, and Preserves

Wildlife movement and habitat fragmentation are important issues in assessing impacts to wildlife. Habitat fragmentation occurs when a proposed action results in a single, unified habitat area being divided into two or more areas in such a way that the division isolates the two new areas from each other. Isolation of habitat occurs when wildlife cannot move freely from one portion of the habitat to another or from one habitat type to another, as in the fragmentation of habitats within and around “checkerboard” residential development. Habitat fragmentation also can occur when a portion of one or more habitats is converted into another habitat, as when annual burning converts scrub habitats to grasslands habitat. The project area is located within previously disturbed and routinely managed areas that offer little to no value to wildlife movement. These areas are subject to frequent human disturbance that do not provide linkage to wildlife habitat.

a) Less than Significant with Mitigation Incorporated

A project-level Biological Resources Technical Study (**Appendix B**) was prepared to identify potential impacts to special-status species that would result from the proposed project. Although 27 special status plant species have been previously documented within a five-mile radius of the project area by the CNDDB and USFWS-IPaC, the field survey determined that the project site does not contain suitable habitat for any special status species. It was determined that the project site does not contain suitable habitat to support special status plant species because of the disturbance history of the site, lack of suitable soils, inappropriate hydrologic conditions, or absence of appropriate vegetation communities. Due to the absence of special status plant species within the project impact area, impacts to special status plant species are not anticipated to result from the proposed project.

Special-status wildlife were evaluated for their potential to occur within the project area, which includes the area of ground disturbance for construction of the pipelines and a 25-foot buffer on either side of the pipeline (See **Figure 3-3** and **Figure 3-4**), where direct or indirect impacts could occur. Twenty-six special-status wildlife species were previously recorded within a five-mile radius of the project area and were evaluated for their potential to occur within the project site based upon presence of suitable habitat as identified during the field surveys and existing knowledge of the project area. The site was determined to contain marginally suitable habitat for western yellow bat (*Lasiurus xanthinus*) and western mastiff bat (*Eumops perotis californicus*). Accordingly, these species have moderate potential to occur within the project site. Western yellow and western mastiff bat could roost in trees adjacent to the project site. Burrowing owl (*Athene cunicularia*) was determined to have low potential to occur in the project area, although some elements of suitable habitat exist in the unpaved portions of the site, particularly along irrigation levees. However, the only recent occurrence (within last 15 years) was recorded more than 3 miles southeast of Saint Anthony’s project site. No special status wildlife species were observed during the field survey. **Mitigation Measures BIO-1** and **BIO-2** would be implemented to reduce the potential to impact any roosting bats or burrowing owls.

There is habitat within and adjacent to the project area that is suitable for nesting birds, which are protected by the MBTA and the CFGC. Therefore, the proposed project has the potential to result in impacts to nesting birds through increased injury or mortality, or disruption of normal adult behaviors resulting in the abandonment or harm to eggs and

nestlings if construction activities would be required during the nesting season. Construction occurring within the vicinity of nesting birds may also result in indirect impacts resulting from noise and dust. If construction activities related to the proposed project would occur during the nesting season, **Mitigation Measure BIO-3** would be implemented to reduce potential impacts to nesting birds to less than significant levels. Therefore, with implementation of **Mitigation Measures BIO-1, BIO-2 and BIO-3**, direct or indirect impacts to special status wildlife species and nesting birds would be less than significant.

b) Less than Significant Impact

Land cover within the project alignment is primarily developed urban and agricultural areas. According to the CNDDDB and USFWS-IPaC search, no sensitive plant communities have been recorded within a five-mile radius of the project area. Additionally, no sensitive vegetation communities were observed within or adjacent to the project area. Furthermore, project impacts would be limited to previously disturbed areas, such as within roadway rights-of-way and on private, developed properties, with high human activity. Therefore, potential impacts to sensitive vegetation communities would be less than significant and no mitigation would be required.

c) Less than Significant Impact with Mitigation Incorporated

The Whitewater River/Coachella Valley Stormwater Channel and its connecting irrigation channels are located within the project area. The Whitewater River/Coachella Valley Stormwater Channel is considered a Traditionally Navigable Water by the USACE. The Whitewater River/Coachella Valley Stormwater Channel within the project area contains dense tamarisk scrub and other small connecting channels are unvegetated. As such, the Whitewater River/Coachella Valley Stormwater Channel is subject to USACE, RWQCB, and CDFW jurisdiction. The irrigation channels are not subject to USACE, RWQCB jurisdiction because they are man-made conveyances for agricultural purposes; however, they are subject to CDFW jurisdiction because they convey surface water and might support species (Land, 2019). Jurisdictional features (the Whitewater River/Coachella Valley Stormwater Channel and the agricultural drains) could be partially or fully avoided through project design if trenchless technologies (HDD or jack and bore) are used for the channel crossings.

If HDD is selected, CVWD would prepare a Frac-Out Prevention and Contingency Plan to ensure that any potential impacts to jurisdictional resources due to frac-out are minimized. Frac-out is the unplanned release of drilling fluids to the surface during HDD. Although drilling fluid is typically bentonite and non-toxic, if frac-out occurs in the creek, it can result in sedimentation in the creek or other water quality impacts. If HDD is used, **Mitigation Measure BIO-4** would be implemented. This mitigation measure requires development of a Frac-Out Prevention and Contingency Plan that would include monitoring for frac-out occurrence and appropriate responses to frac-out events to minimize impacts of potential release of drilling fluids into waterways. With these measures in place, potential water quality and species impacts in the Whitewater River/Coachella Valley Stormwater Channel and the agricultural drains from frac-out would be less than significant.

As part of project design, a SWPPP, which would include BMPs, would also be developed to ensure the proposed project would not directly impact the Whitewater River/Coachella Valley Stormwater Channel or its connecting irrigation channels. Compliance with agency permits and regulations, along with implementation of **Mitigation Measure BIO-4**, would ensure impacts to state or federal waters or other potentially jurisdictional features would be less than significant.

d) Less than Significant Impact with Mitigation Incorporated

The proposed project is located within previously developed and routinely managed areas that offer little to no value to wildlife movement. The proposed project is not anticipated to have an effect on localized, regional, or urban-adapted wildlife movement. Additionally, ground surfaces would be restored to pre-construction conditions and the project area would retain the existing contiguity and would therefore not result in habitat fragmentation in the region. The proposed

project would not include additional lighting and construction activities would occur during the day and would not indirectly impact potential nocturnal wildlife movement through nighttime lighting or noise generation. However, the proposed project is located adjacent to and within the *Coachella Valley Stormwater Channel and Delta CVMSHCP Conservation Area*. The Seferino Huerta MHP is the only project component within the conservation area, however none of the projects' ground disturbance impacts occur on un-disturbed parcels. As outlined in the CVMSHCP, the proposed project would comply with impact avoidance, minimization and mitigation measures specified in Section 4.4 of the CVMSHCP (See **Mitigation Measure BIO-5**) and would implement the Section 4.5 Land Use Adjacency Guidelines where applicable to avoid and minimize indirect effects to this Conservation Area (CVAG 2007). Therefore, with implementation of **Mitigation Measure BIO-5** and applicable Land Use Adjacency Guidelines, direct and indirect impacts to wildlife movement would be less than significant.

e) No Impact

Riverside County Ordinance 559 protects oak woodlands and requires a permit for removal of any native trees on parcels greater than one-half acre in size and above 5,000 feet in elevation; however, activities conducted by public utilities are exempt. No protected trees would be removed as part of the proposed project as no trees within the project area meet these criteria. The proposed project would not conflict with any local policy or ordinance and impacts would be less than significant. No mitigation would be required.

f) Less than Significant Impact with Mitigation Incorporated

The proposed project is within the CVMSHCP plan area and is located adjacent to and within a CVMSHCP Conservation Area called the *Coachella Valley Stormwater Channel and Delta Conservation Area* (see **Figure 3-5**). As shown in **Figure 3-5**, the Seferino Huerta MHP is the only project component within the conservation area, which is a fenced-in area with disturbed habitat. As outlined in the CVMSHCP Section 7.3, the proposed project is a covered activity and would comply with applicable impact avoidance, minimization and mitigation measures specified in Section 4.4 of the CVMSHCP regarding species and habitat conservation (See **Mitigation Measure BIO-5** below). The proposed project would also implement the applicable Section 4.5 Land Use Adjacency Guidelines to avoid and minimize indirect effects to this conservation area (CVAG 2007). These guidelines include measures regarding drainage, toxics, lighting, noise, invasive species, barriers, and grading/land development. With the implementation of these guidelines, and **Mitigation Measure BIO-5**, the proposed project would avoid direct impacts to this CVMSHCP Conservation Areas and would not conflict with the CVMSHCP Conservation Objectives. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures:

Mitigation Measure BIO-1: Roosting Bats Impact Avoidance and Minimization

To avoid disturbance of roosting bats, which are CDFW Species of Special Concern, CVWD shall, at least two weeks prior to, but not more than 30 days prior to, the start of construction, contract with a qualified biologist to conduct a pre-construction survey for roosting bats. The survey shall include all trees, bridges, and structures suitable for roosting by the western yellow bat and western mastiff bat. The pre-construction survey shall be conducted within the disturbance footprint and a 100-foot buffer with inaccessible areas (i.e. private lands) surveyed with binoculars, as feasible.

If active bat roosts are present onsite, a buffer zone of 100 feet shall be established around the roosts that excludes construction activities or other disturbances. Tree removal activities shall occur only during periods when bats are not roosting in those trees proposed to be removed, as determined by a qualified biologist. If active maternity roosts or non-breeding bat hibernacula are found in trees scheduled to be removed, removal activities will be conducted during a season when young are not present

Mitigation Measure BIO-2: Pre-Construction Burrowing Owl Surveys

To avoid potential impacts to burrowing owl, a pre-construction clearance survey for burrowing owl shall be conducted no more than fourteen (14) days prior to initiation of construction activities. The burrowing owl pre-construction survey shall be conducted on-foot within the proposed disturbance area including a 500-foot buffer. The survey methods will be consistent with the Staff Report on Burrowing Owl Mitigation (CDFW 2012) and shall consist of walking parallel transects spaced adequately to obtain 100% visual coverage of the site. The survey shall be conducted by a biologist familiar with the identification of burrowing owl and their habitat.

If burrowing owls are found within the project area during the pre-construction surveys, active burrows will be avoided. If possible, the timing and location of construction activities will be adjusted to avoid the occupied burrow by the appropriate distance (see below), where possible. Due to the size of the project, it is anticipated that the construction schedule and location can be modified to avoid all potential impacts to occupied burrows during the breeding season. Buffer zones for occupied burrows will be established at 500 feet during the breeding season (February 1 to August 31) and at 100 feet for the non-breeding season. These buffers may be adjusted in consultation with California Department of Fish and Wildlife and Coachella Valley Conservation Commission and monitored at the discretion of a qualified biologist. The buffer zone will be clearly marked with flagging and/or construction fencing

Mitigation Measure BIO-3: Nesting Birds

To avoid disturbance of nesting birds, including raptor species protected by the MBTA and CFGC 3503, activities related to the proposed project including, but not limited to, vegetation removal, ground disturbance, and construction shall occur outside of the bird breeding season (typically January 1 to September 15) to the extent practicable.

If construction must occur within the bird breeding season (January 1 through September 15), CVWD shall, no more than three days prior to initiation of ground disturbance and/or vegetation removal, contract with a qualified biologist to conduct a nesting bird and raptor pre-construction survey within the disturbance footprint plus a 100-foot buffer (300-foot for raptors), where feasible. If the proposed project is phased or construction activities stop for more than one week, a subsequent pre-construction nesting bird and raptor survey will be required prior to each phase of construction within the project site.

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

If nests are found, their locations shall be flagged. An appropriate avoidance buffer ranging in size from 25 to 50 feet for song birds, and up to 500 feet for raptors depending upon the species and the proposed work activity, and CDFW approval shall be determined and demarcated by a qualified biologist with bright orange construction fencing or other suitable flagging. Buffers will be determined in conjunction with CDFW through the development of a nesting bird management plan. Active nests shall be monitored at a minimum of once per week until it has been determined that the nest is no longer being used by either the young or adults. No ground disturbance shall occur within this buffer until the qualified biologist confirms that the breeding/nesting is completed, and all the young have fledged. If project activities must occur within the buffer, they shall be conducted at the discretion of the qualified biologist. If no nesting birds are observed during pre-construction surveys, no further actions would be necessary.

Mitigation Measure BIO-4: Frac-Out Prevention and Contingency Plan

If HDD method of trenchless crossing of the Whitewater River/Coachella Valley Stormwater Channel, the agricultural drain south of Avenue 66 at Lincoln Street, and/or the agricultural drain south of Avenue 66 at Buchanan Street is determined to be required, CVWD shall require its construction contractor to prepare a Frac-Out Prevention and Contingency Plan, prior to construction. At minimum, the Plan shall prescribe the following measures to ensure protection of aquatic resources, special status plants, and wildlife:

- Verify recommended depth of the pipeline under the channel based on soil properties and risk for potential frac-out during HDD operation,
- Procedures to minimize the potential for a frac-out associated with HDD;
- Procedures for timely detection of frac-outs;
- Procedures for timely response and remediation in the event a frac-out; and
- Monitoring of drilling and frac-out response activities in jurisdictional areas by a qualified biologist.

Mitigation Measure BIO 5: CVMSHCP Surveys

Prior to construction, CVWD will coordinate with Coachella Valley Association of Governments (CVAG) or Coachella Valley Conservation Commission (CVCC) on specific burrowing owl and Crissal Thrasher survey requirements of Section 4.4 of the CVMSHCP that should be implemented for the portion of Seferino Huerta MHP located within the *Coachella Valley Stormwater Channel and Delta Conservation Area*. CVWD will implement any surveys determined to be required by CVAG or the CVCC to ensure compliance with the CVMSHCP.

3.5 Cultural Resources

Would the Project:	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

A Cultural Resources Assessment Report was prepared in April 2019 by Rincon Consultants, Inc. for the proposed project. An intensive pedestrian field survey of the project area was conducted on February 12 and 13, 2019 and on April 18, 2019. The *Cultural Resources Assessment Report* was prepared to satisfy CEQA; AB52 Tribal Cultural Resources; the National Environmental Policy Act (NEPA); and Section 106 of the National Historic Preservation Act (NHPA). The complete *Cultural Resources Assessment Report* is provided in **Appendix C** and is summarized in this IS/MND. The field survey identified no archaeological resources in the project area. In addition, results of the field investigation confirm no historic-age buildings or structures are located within the project area.

On January 17, 2019, as part of the Cultural Resources Assessment Report, a cultural resource records search of the California Historical Resources Information System (CHRIS) was conducted at the Eastern Information Center at the University of California, Riverside, and a search of the National Register of Historic Places, (NRHP), the California Register of Historical Resources (CRHR), and the California State Historic Resources Inventory list was conducted. The records search was conducted to identify any previously recorded cultural resources and previously conducted cultural resources studies within the project area and a one-half-mile radius surrounding it. In addition, Dokken Engineering conducted a cultural resource assessment of a portions of the project area north of Avenue 66 for the Phase 1b pipeline extension (Marks 2018) and the results were included in the current cultural resource assessment

The CHRIS records search indicate that 39 previous cultural resources studies have been conducted within a one-half-mile search radius of the project area. Of these studies, fifteen include portions of the project area and overlap with approximately 50 percent of the project area. A total of 18 cultural resources have been previously recorded within a one-half-mile radius of the proposed project. These include nine historic period structures (Union Pacific Railway, Whitewater River/Coachella Valley Stormwater Channel, a utility line, and six road segments), one district (Martinez Historical District), four historic period archaeological sites (Mecca Railroad Station, the U.S. Experimental Date Station, Edna Cast Date Farm Complex, and a refuse scatter), one multi-component archaeological site (prehistoric and historic period artifact scatter), one prehistoric site (artifact scatter), and two prehistoric artifacts (isolated ceramic sherds).

The Martinez Historic District (P-33-001292) is situated approximately one-third of a mile of the project area on the Torres Martinez Indian Reservation. The district contains several historic period Indian Agency buildings, a palm tree,

and a multi-component archaeological site (P-33-009462), the latter of which consists of an artifact scatter composed of prehistoric (ceramics and flaked stone artifacts) and historic period (glass, metal, and ceramics) materials. The Martinez Historic District was listed on the NRHP in 1973.

Three additional prehistoric archaeological resources have been recorded within proximity of the project area on the Torres Martinez Indian Reservation. P-33-017371 consists of a surface scatter of ceramic and flaked stone artifacts and a buried subsurface feature located two-tenths of a mile from the project area. A Phase II evaluation of P-33-017371 determined the resource was individually ineligible for listing on the NRHP or CRHR and was not a contributing component to the Martinez Historical District. Two isolated artifact finds (P-33-017372 and P-33-017761), both of which consist of a small number of ceramic sherds, have also been recorded within one-half mile of the project area.

Two of the 18 known cultural resources, road segments on Avenue 66 (P-33-020844) and Lincoln Street (P-33-020839), intersect with the project area. Neither the field survey nor the previous field effort conducted by Dokken Engineering in March 2018 identified no archaeological resources in the project area. Avenue 66 (P-33-020844) consists of a 26-foot-wide, two-lane, asphalt-paved roadway flanked by gravel and dirt shoulders that measure as much as 15 feet in width. The appearance of the road remains largely unchanged since recordation in 2012. Given no significant alterations have occurred to P-33-020844 since its original documentation, the previous evaluation of Avenue 66 appears to remain valid; the resource is ineligible for listing on the NRHP and CRHR. A 100-foot long segment of Lincoln Street (P-33-020839) south of Avenue 66 was originally recorded in 2012. The boundary has since been expanded to encompass an almost one-mile long section of the road between Avenue 66 and Avenue 68. The recorded road consists of a 27-foot wide paved asphalt surface flanked by 12.5-foot wide earthen shoulders, giving the right-of-way a total width of approximately 52 feet. The paved surface is essentially flush with the unimproved shoulders. Although the portion of the roadway approaching the intersection with Avenue 66 is delineated as a two-lane road, the remainder is unmarked. This segment of Lincoln Street is likely associated with agricultural development on the outskirts of the community of Mecca, but, due to its comparatively recent construction date, is not linked to the early establishment of Mecca. The road also does not appear to have achieved significance in later years. It is not known to have played a role in any other historical events or with any individuals known to have made important historical contributions. Additionally, the subject road segment is of a ubiquitous type and does not represent a distinctive engineering design or method of construction. Finally, it is has not yielded and is unlikely to yield important prehistoric or historical information. Therefore, Lincoln Street does not meet any of the criteria for listing on the NRHP or the CRHR. In addition, results of the field investigation confirm no historic-age buildings or structures are located within the project area.

Section 106 Native American outreach was initiated in January 2019. In addition, CVWD initiated AB 52 consultation in May 2019. *Section 3.1.18 Tribal Cultural Resources* provides an overview of the tribal outreach and consultation regarding the proposed project.

a-c) Less than Significant Impact with Mitigation Incorporated

According to a CHRIS records search conducted for the Cultural Resources Assessment (**Appendix C**), two previously recorded historical structures, Avenue 66 (P-33-020844) and Lincoln Street (P-33-020839) overlap the project area. Both resources are ineligible for listing on the NRHP and CRHR. Based on the results of the Cultural Resources Assessment Report, with adherence to **Mitigation Measures CUL-1, CUL-2, and CUL-3**, there would be no effect on historic properties. No additional cultural resources were found within the project area during the field surveys conducted on February 12 and 13, 2019 and April 18, 2019, or the previous field effort conducted by Dokken Engineering in March 2018.

Although the archaeological resources are not anticipated to be encountered due to the developed nature of the project area, archeological sensitivity of the project area is considered relatively high given the cultural resources documented within proximity to the proposed project. Therefore, there is potential for ground-disturbing activities to expose

previously unrecorded cultural resources. **Mitigation Measure CUL-1** would require the initial ground-disturbing activities be observed by an archaeological and Native American monitor. **Mitigation Measure CUL-2** would require that all earth disturbing work be temporarily suspended if cultural resources are discovered during construction until the discovery can be evaluated, and appropriate notification measures can be taken. With implementation of **Mitigation Measures CUL-1** and **CUL-2**, potential impacts resulting in a substantial adverse change to the significance of historical and/or archeological resources would be reduced to less-than-significant levels.

The discovery of human remains is always a possibility during ground disturbing activities. **Mitigation Measure CUL-3** would be implemented to ensure proper procedures would be in place if human remains were unearthed during construction activities. The implementation of this measure would reduce impacts to less-than-significant levels.

Mitigation Measures:

Mitigation Measure CUL-1: Initial Monitoring of Archaeological Resources

CVWD shall ensure that initial project-related ground-disturbing activities shall be observed by an archaeological and Native American monitor. The archaeological monitor shall be under the direction of a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for prehistoric archaeology (National Park Service 1983). If archaeological resources are encountered during ground-disturbing activities, work in the immediate area shall halt and the find shall be evaluated for CRHR and/or NRHP eligibility. Archaeological monitoring may be reduced or halted at the discretion of the qualified archaeologist as warranted by conditions such as encountering bedrock, sediments being excavated are fill materials, or negative findings during initial ground-disturbing activities. If monitoring is reduced, spot-checking shall occur when ground-disturbance moves to a new location or when ground disturbance will extend to depths not previously reached (unless those depths are within bedrock). Both the project archeologist and Native American monitor will be invited to attend the pre-construction meeting. The project archeologist and Native American monitor will provide a brief orientation to construction crews on the first day of construction.

Mitigation Measure CUL-2: Unanticipated Discovery of Cultural Resources

In the event that cultural resources are unearthed during project construction, the project archeologist, in coordination with CVWD's construction inspector shall temporarily suspend all earth disturbing work within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeologist, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:

- If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately, and no agency notifications are required.
- If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, he or she shall immediately notify CVWD's Construction Inspector and Environmental Services Department. CVWD shall consult on a finding of eligibility and implement appropriate treatment measures if the find is determined to be eligible for inclusion in the NRHP or CRHR. Work may not resume within the no-work radius until CVWD, through consultation as appropriate, determines that the site either: 1) is not eligible for the NRHP or CRHR; or 2) that the treatment measures have been completed to its satisfaction.

a) Less than Significant Impact

Construction of the proposed project would involve construction-related fossil fuel consumption from operation of diesel-powered construction equipment, and fossil fuel consumption from material hauling, delivery, and worker vehicle trips. **Table 3-7** summarizes the anticipated construction fleet for the proposed project. **Table 3-8** summarizes the estimated material delivery and hauling truck trips, and worker vehicle trips for each type of construction activity.

Table 3-7: Construction Fleet Summary

Construction Phase	Duration (days)	Anticipated Fleet	Usage (hours/day)
Grading	261 days	2 Excavators	8
		2 Forklifts	8
		6 Tractor/Loader/Backhoes	7
		1 Trencher	8
		1 Bore/Drill Rig	8
Re-paving	261 days	2 Cement and Mortar Mixer	8
		1 Paver	8
		2 Paving Equipment	8
		2 Rollers	8
		1 Tractor/Loader/Backhoes	8

Sources: Project-specific information provided by design engineers and duration based on a total construction timeframe of one year; see *Section 2 Project Description*. CalEEMod Version 2016.3.2; see **Appendix A** for model output.

Table 3-8: Construction Trip Summary

Construction Phase	Duration (days)	Daily Worker Vehicle Trips (14.6 miles each)	Daily Vendor Trips (6.2 miles each)	Daily Hauling Truck Trips (20 miles each)
Grading	261 days	43	10	5
Re-paving	261 days	43	10	5

Sources: Project-specific information provided by design engineers; see *Section 2 Project Description*. CalEEMod Version 2016.3.2; see **Appendix A** for model output.

The proposed project would implement typical construction practices such as trenching and repaving. As shown in **Table 3-7** and **Table 3-8**, the project would not require any unusual or excessive construction equipment or practices that would result in wasteful, inefficient, or unnecessary consumption of energy compared to projects of similar type and size. In addition, the construction fleet contracted for the proposed project would be required to comply with the CARB In-Use Off-Road Diesel-Fueled Fleets Regulations, which would limit vehicle idling time to 5 minutes, restrict adding vehicles to construction fleets with older-tier engines, and establish a schedule for retiring older, less fuel-efficient engines from the construction fleet. As such, construction of the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy during construction.

The proposed project would have minimal daily operational energy demand associated with fossil fuels consumed for maintenance activities, including regular inspection trips (see *Section 2 Project Description*). The proposed project would implement typical operational practices compared to projects of similar type and size. In addition, the project would reduce existing energy use associated with current pumping and treatment of well water at the SWSs. Finally, the energy consumption of the proposed project is necessary to provide a safe and reliable drinking water supply at each of the nine locations. As such, operation of the project would not result in wasteful, inefficient, or unnecessary consumption of energy.

b) Less than Significant Impact

The *2017 Climate Change Scoping Plan* (CARB 2017) focuses on reducing energy demand, and GHG emissions, that result from mobile sources and land use development. The proposed project would not involve a considerable increase in new vehicle trips or land use changes that would result in an increase in vehicle trips, such as urban sprawl. The *Scoping Plan* also recognizes that about two percent of the total energy used in the state is related to water conveyance; it calls for, “increased water conservation and efficiency, improved coordination and management of various water supplies, greater understanding of the water-energy nexus, deployment of new technologies in drinking water treatment, groundwater remediation and recharge, and potentially brackish and seawater desalination.” By connecting the SWSs to CVWD’s drinking water supply, the project would support the *Scoping Plan* objective of improved coordination and management of various water supplies, and offset energy demands associated with pumping and treatment at the SWSs.

The proposed project would not interfere with existing County or regional programs intended to reduce energy and improve water use efficiency. It would not result in emissions higher than the SCAQMD significance screening thresholds and it would support Riverside County’s *Climate Action Plan* (CAP) goal of reducing per-capita water consumption by providing a metered drinking water supply (see further analysis in *Section 3.8 Greenhouse Gas Emissions* of this document). The proposed project would not, therefore, conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant, and no mitigation would be required.

Mitigation Measures: None required or recommended.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

The Coachella Valley is located within California's Colorado Desert Geomorphic Province, bordered to the west by the Peninsular Ranges, to the north by the Transverse Ranges, and to the east by the Mojave Desert. The Colorado Desert is a low-lying barren desert basin, portions of which are about 245 feet below sea level.

The majority of Southern California, including the Coachella Valley, is considered a seismically active region and is subject to risk from earthquakes and other geologic effects that are triggered by earthquakes such as ground shaking,

fault rupture, landslides, liquefaction, subsidence, and seiches. Two of California's most active faults, the San Andreas and San Jacinto faults, are located within proximity to the project area. The San Andreas and San Jacinto have been designated by the California Geological Survey as Alquist-Priolo Earthquake Fault Zones. The San Andreas Fault runs through the Coachella Valley and is located approximately five miles east of the project area. The San Jacinto Fault is a major strike-slip fault zone located approximately 15 miles southwest of the project area (USGS 2019).

a,c) Less than Significant Impact

The primary seismic hazard to the proposed project is strong ground shaking from earthquakes produced by local and regional faults. The intensity of ground shaking would depend upon the magnitude of the earthquake, distance to the epicenter, and the geology of the area between the epicenter and the project site. Seismically induced ground rupture could occur with the physical displacement of surface deposits in response to an earthquake's seismic waves. Ground rupture is most likely along active faults, and typically occurs during earthquakes of magnitude five or higher. Ground rupture only affects the area immediately adjacent to a fault.

The proposed project is located approximately five miles from the San Andreas fault and approximately 15 miles from the San Jacinto fault, which are two of California's most active faults. Both the San Andreas and San Jacinto faults are designated by the California Geological Survey as Alquist-Priolo Earthquake Fault Zones. Ground rupture is most likely to occur along active faults. According to the California Geologic Survey's on-line *Earthquake Hazard Zone Application* (accessed 3/20/2019), the proposed project is not located within a fault zone. Due to the distance between the proposed project and the San Andreas and San Jacinto faults, impacts related to ground rupture would be less than significant.

However, due to the proximity of the proposed project to two active fault zones, the project area is subject to seismic ground shaking. The proposed project would construct approximately 27,000 linear feet of underground pipelines, a pressure reducing station, and associated onsite piping, meters, hydrants and valves to consolidate three existing SWS into CVWD's potable water system. Although impacts related to strong seismic ground shaking could potentially be significant in the project area, the proposed project would not include any land use components that would bring additional people to the area or structures people would occupy. The pipelines would be designed in conformance with seismic engineering standards to reduce potential damage in the event of ground shaking. Therefore, the proposed project would not directly or indirectly result in substantial adverse effects, including the risk of loss, injury, or death due to seismic ground shaking and impacts would be less than significant.

The California Geologic Survey's on-line *Earthquake Hazard Zone Application* (accessed 3/20/2019) provides liquefaction and landslides zones. The proposed project is not located within a liquefaction or landslide zone or located on a geologic unit that is unstable or would become unstable. Additionally, the project area is relatively level with no slopes or hills. As such, the proposed project would not result in impacts related to seismic-related ground failure or landslides. Impacts would be less than significant, and no mitigation would be required.

b) Less than Significant Impact

The proposed project would result in minor erosion of soils on or offsite during project construction due to the presence of soil piles and exposed HDD or jack and bore pits. However, construction of the proposed project would include BMPs as specified in the SWPPP to control wind or water erosion of exposed soils. Some of the BMPs included in the SWPPP may include use of silt fences to prevent erosion and sedimentation into water bodies, covering of stockpiles, use of desilting basins, limitations on work during high-wind events, and post-construction revegetation and drainage requirements. With implementation of BMPs, the potential for soil erosion or topsoil loss during proposed project construction would be considered less than significant and no mitigation would be required.

d) Less than Significant Impact

Expansive soils are generally high in clays or silts that shrink or swell with variation in soil moisture content and can adversely affect the structural integrity of underground facilities including pipelines. According to the UC Davis on-line *SoilWeb Tool* (accessed 3/20/2019), the project area is underlain primarily by a variety of sandy loam soils. Design of the proposed pipelines would adhere to CVWD's professional engineering standards, which provide regulations related to soils and foundations, to avoid adverse effects of potential expansive soils. Therefore, impacts related to expansive soils would be less than significant.

e) No Impact

Septic tanks or other alternative wastewater disposal systems would not be a part of the proposed project. Accordingly, no impact would occur.

f) Less than Significant Impact

Significant paleontological resources are fossils or assemblages of fossils that are unique, unusual, rare, uncommon, diagnostically or stratigraphically important, and those that add to an existing body of knowledge in specific areas, stratigraphically, taxonomically, or regionally. They include fossil remains of large to very small aquatic and terrestrial vertebrates, remains of plants and animals previously not represented in certain portions of the stratigraphy, and assemblages of fossils that might aid stratigraphic correlations, particularly those offering data for the interpretation of tectonic events, geomorphologic evolution, paleoclimatology, and the relationships of aquatic and terrestrial species (County of Riverside 2002).

The proposed project area is located in the Salton Trough, a large tectonic depression that includes the Coachella and Imperial Valleys of southern California, and the western half of the Mexicali Valley and the Colorado River delta in Mexico (Alles 2011). Over the past 4.5 million years, the Salton Trough has been periodically inundated with fresh and brackish waters, influenced by the Gulf of California, the Colorado River, and ancient Lake Cahuilla. Lake Cahuilla was a former freshwater lake that periodically occupied a major portion of the Salton Trough during the Holocene, approximately 10,000 to 240 years ago (Deméré 2002).

According to the Geologic Map of the Palm Desert & Coachella 15-minute quadrangles (Dibblee and Minch 2008), the project site is underlain by alluvial sand and clay of valley areas. Where the proposed project crosses the Whitewater River/Coachella Valley Stormwater Channel, the underlying sediments are alluvial sand and gravel associated with the channel. These relatively young sedimentary deposits are generally too young to contain fossilized material.

Project excavation is expected to reach depths of five to six feet below the ground surface and is therefore not expected to reach depths where sensitive paleontological resources would be expected to occur. As a result, the potential for encountering fossil resources during project excavation or ground disturbance is low and impacts to paleontological resources would be less than significant.

Mitigation Measures: None required or recommended.

to GHG emissions and provides a specific implementation tool to guide future decisions of the County. The County's CAP is qualified for CEQA tiering and streamlining of individual projects' CEQA review.

The County CAP GHG inventory included GHG emissions resulting from Water Supply, including GHG emissions resulting from energy used to pump/transport these imported sources of water from their sources to Riverside County. The CAP includes GHG emissions reduction programs and regulations, which include the following measures to reduce GHG emissions from purchased water:

- Measure R1-W1: Renewable Portfolio Standard Related to Water Supply and Conveyance. Increase electricity production from eligible renewable power sources to 33 percent by 2020.
- Measure R2-W1: Water Use Reduction Initiative. Encourages Riverside County to adopt a per capita water use reduction goal in support of the Governor's Executive Order S-14-08 which mandates the reduction of water use of 20 percent per capita. In addition, implement County *General Plan* Policies LU 4.1d and f, C 5.2 and OS 2.1 through OS 2.4 and provide incentives for all new proposed development projects to comply with the California Green Building Standards Code to reduce indoor potable water use by 20 percent and outdoor potable water use by 50 percent.
- Measure R2-W2: Increase Reclaimed Water Use. New development is able to achieve "points" against the CAP screening tables by including the use of recycled water (County of Riverside 2018).

On December 5, 2008, the SCAQMD Board approved interim CEQA GHG significance thresholds for stationary sources, rules, and plans using a tiered approach for determining significance. Tier 3, the primary tier the SCAQMD board uses for determining significance, set a screening significance threshold of 10,000 MTCO₂e/year for determining whether a project would have a less than significant cumulative GHG impact (SCAQMD 2008b).

Climate change is a cumulative issue. Most projects do not generate sufficient GHG emissions to directly influence climate change by any noticeable degree; however, a project can contribute incrementally to cumulative effects that are significant. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines, Section 15064[h][1]).

a) Less than Significant Impact

The project would generate GHG emissions through the burning of fossil fuels or other emissions of GHGs, as a result of both construction and operations activities. Direct emissions would result from fuels burned to power construction equipment and worker and heavy construction equipment trips to and from the site. Construction is anticipated to last approximately 12 months. Once operational, the project pipelines would require routine maintenance, which would have a relatively small amount of GHG emissions from vehicle trips. However, as explained in *Section 2 Project Description*, CVWD would continue to operate its water system with no operational modifications. New water meters would be read per established CVWD schedules. The proposed project would not result in a net change in O&M activities and GHG emissions from mobile sources would, therefore, be negligible. Once the project is installed, it would not have a substantial demand for electricity or natural gas because the water main pipelines would be pressurized in accordance with CVWD's existing master plan. Therefore, indirect GHG emissions from the project's energy supply would be negligible. The proposed project may be associated with occasional GHG emissions from 'area' sources, including operation of landscaping equipment or recoating pipelines.

GHG emissions were estimated using CalEEMod version 2016.3.2, consistent with the methodology and project-specific assumptions used to quantify air pollutant emissions (see *Section 3.3 Air Quality*). The GHG emissions analyzed herein do not account for emissions from existing energy consumption associated with the current SWS operations. Consistent with SCAQMD guidance, construction emissions were amortized over the life of the project,

defined as 30 years, added to the operational emissions, and compared to the applicable interim GHG significance threshold Tier 3 (SCAQMD 2008b). Annualized GHG emissions are summarized in **Table 3-9**.

Table 3-9: Proposed Project GHG Emissions (MTCO₂e/year)

Source	MTCO ₂ e
Energy	<i>Negligible</i>
Mobile	<i>Negligible</i>
Area	<0.1
Amortized Construction Emissions	29.7
Total	29.7
SCAQMD Threshold	10,000
Significant?	No

The results of the inventory for construction and operational emissions, as shown in the CalEEMod output tables in Appendix A, are presented in **Table 3-9**. GHG emissions from the project would be below SCAQMD thresholds of significance. The project would not generate GHG emissions, directly or indirectly, that may have a significant impact on the environment and no mitigation would be necessary.

b) Less than Significant Impact

The *2017 Climate Change Scoping Plan* focuses on reducing energy demand, and GHG emissions, that result from mobile sources and land use development. The proposed project would not involve a considerable increase in new vehicle trips or land use changes that would result in an increase in vehicle trips, such as urban sprawl. The *Scoping Plan* also recognizes that about two percent of the total energy used in the state is related to water conveyance; it calls for, “increased water conservation and efficiency, improved coordination and management of various water supplies, greater understanding of the water-energy nexus, deployment of new technologies in drinking water treatment, groundwater remediation and recharge, and potentially brackish and seawater desalination.” By connecting the SWSs to CVWD’s drinking water supply, the project would support improved coordination and management of various water supplies, and offset energy demands associated with pumping and treatment at the SWSs.

The proposed project would not interfere with existing County or regional programs intended to reduce energy and improve water use efficiency. It would not result in emissions higher than the SCAQMD significance screening thresholds. It would also support Riverside County’s CAP goal of reducing per-capita water consumption by providing a metered drinking water supply. The proposed project would not, therefore, conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant, and no mitigation would be required.

Mitigation Measures: None required or recommended.

3.9 Hazards and Hazardous Materials

Would the Project:	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

Hazardous materials are currently used throughout the project area for agricultural, residential, transportation, construction, and other similar land uses. Through natural events, system failures, and accidents (spills), hazardous materials can become a risk to the environment and human health. Numerous local, state and federal laws exist to regulate the storage, use, handling and transportation of hazardous materials. To increase public safety and awareness of hazardous materials exposure risk, businesses and entities that handle, store, transport, or use hazardous materials are required to file reports with appropriate authorities and maintain emergency response plans in the event of a hazardous materials release.

A regulatory records search was performed for the project area using the SWRCB *GeoTracker* database (SWRCB 2015) and the California Department of Toxic Substances Control (DTSC) *EnviroStor* database (DTSC 2019). These lists are a compilation of information from various sources listing potential and confirmed hazardous waste and hazardous substances sites in California. There are three active Leaking Underground Storage Tank (LUST) Cleanup Sites and two closed LUST Cleanup Sites listed on the SWRCB's *GeoTracker* database within one-quarter mile of the project area. Two of the active cleanup sites listed on the *GeoTracker* database, Former Coachella Valley Minimex (T0606500981) and Former Mecca Chevron (T10000003076) are located approximately 1,000 feet to the east of the Avenue 66 and Lincoln Street intersection at the intersection of Avenue 66 and Hammond Road. The third active cleanup site is, RVSD CO Fire #40 (T0606500985), is located approximately 1,150 feet to the northeast of the Avenue 66 and Lincoln Street intersection at 91100 4th Street. There are no hazardous sites listed on the EnviroStor database within one-quarter mile of the proposed project. There are two cleanup sites listed on the EnviroStor database located approximately two miles from the project area, one of which is inactive (Salton Sea Mecca Area – 80001166) and the other requires no further investigation (K-12 Educational Center – 33010012).¹

The California Department of Forestry and Fire Protection's (Cal Fire) *Fire Resources Assessment Program* (FRAP; CalFire 2006) assesses the amount and extent of California's forests and rangelands, analyzes their conditions, and identifies alternative management and policy guidelines. Through the FRAP, Cal Fire produces maps designating very high fire hazard severity zones (VHFHSZ) within State and Local Responsibility Areas. The project is located within the Western Riverside County's Local Responsibility Area (LRA). The Western Riverside County LRA map designates the project area as a non-VHFHSZ (CalFire 2006).

The Jacqueline Cochran Regional Airport is located approximately five miles northwest of the project area.

a) Less than Significant Impact

Construction of the proposed project would temporarily increase the routine transport and use of hazardous materials commonly used in construction activities. Limited quantities of miscellaneous hazardous substances, such as gasoline, diesel fuel, hydraulic fluids, paint, and other similar materials, would be brought into the project area, used, and stored during construction of the proposed project. The proposed project would be required to comply with applicable standards, including Division 20, Chapter 6.5, Article 6.5, Article 6.6, and Article 13 of the California Health and Safety Code and Title 40 CFR Part 263, that regulate the transport, use, storage, and disposal of hazardous materials. Upon completion of construction, the proposed project would not result in additional O&M activities requiring the transport of hazardous materials. Therefore, impacts due to transportation of minor amounts of hazardous materials would be less than significant and no mitigation would be required.

b) Less than Significant with Mitigation Incorporated

Construction of the proposed project could create a hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials used in construction, which include diesel fuel and minor amounts of paints, fuels, solvents and glues. The potential exists for accidents to occur during construction activities, which could result in the release of hazardous materials into the environment. **Mitigation Measure HAZ-1** requires development of a Hazardous Materials Management Spill Control Plan that includes project-

¹ The Categorical Exemption/Categorical Exclusion prepared by CalTrans for the Avenue 66 grade separation project (CalTrans 2006) identified the Former Coachella Valley Minimex (T0606500981), Former Mecca Chevron (T10000003076), RVSD CO Fire #40 (T0606500985), as well as a fourth site, the Chevron Station #9 5315 as being adjacent to the Avenue 66 grade separation project. The Categorical Exemption/Categorical Exclusion called for environmental screening, and, if necessary, Phase II ISA, should final plans indicate that a portion of the parcels will be acquired for new right-of-way.

specific contingencies. Upon completion of construction, the proposed project would not result in a potential to release hazardous materials into the environment. With **Mitigation Measure HAZ-1**, impacts resulting from potential hazardous materials-related accidents during construction would be reduced to a less-than-significant level.

c) No Impact

The Project site is not located within one-quarter mile of an existing or proposed school. Mecca Elementary School is located approximately one-half mile to the northwest of the project area and Saul Martinez Elementary School is located approximately one mile to the east of the project area. Three additional schools are located approximately 1.5 miles to the west of the project area. Therefore, the proposed project would not have the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. There would be no impact, and no mitigation is required.

d) Less than Significant Impact

The GeoTracker database search indicated there are two active hazardous materials cleanup sites within a quarter mile of the proposed project. There are no active cleanup sites listed on the DTSC's EnviroStor database within a quarter mile of the project area. The two active LUST Cleanup Sites listed on the GeoTracker database are located approximately 1,000 to the east of the proposed project and are located on the east side of CA-111.

The proposed project construction would not impact either of these active hazardous waste sites. The Avenue 66 grade separation project would be located adjacent to these sites; CalTrans identified environmental commitment HAZ-1 in its Categorical Exemption/Categorical Exclusion to address this issue (CalTrans 2017) (see footnote 1, above). Therefore, construction and operation associated with the proposed project would not create a significant hazard to the public or the environment through the release of existing materials related to a listed hazardous materials site. Impacts would be less than significant, and no mitigation would be required.

e) Less than Significant Impact

The Jacqueline Cochran Regional Airport is located approximately five miles northwest of the project area. The proposed project would construct approximately 27,000 linear feet of pipeline, a pressure reducing station, and associated onsite piping, meters, hydrants and valves to consolidate three independent, privately owned SWS into CVWD's potable water system. Upon completion of construction, none of the proposed project components would create an aircraft safety hazard or expose residents or workers in the area to excessive aircraft noise. Therefore, impacts would be less than significant, and no mitigation would be required.

f) Less than Significant with Mitigation Incorporated

Construction of the proposed project would involve installation of approximately 27,000 linear feet of pipelines, a pressure reducing station, and associated onsite piping, meters, hydrants and valves to connect three SWSs into CVWD's potable water system. Construction activities would take place within public rights-of-way as well as on private and public land, and potential staging areas include vacant private and public land, parking lots, and segments of closed traffic lanes. Therefore, project construction would temporarily block access to some roadways and driveways that are currently used by emergency response vehicles or in emergency evacuations. *Section 3.17 Transportation* addresses how CVWD would communicate with emergency response agencies to develop emergency access strategies under **Mitigation Measure TRA-1**. Long term, the proposed project would not physically impair or otherwise interfere with emergency response or evacuation in the project vicinity as the majority of the project components would be located below-grade and ground surfaces would be returned to pre-construction conditions. Thus, impacts would be less than significant with mitigation.

g) Less than Significant Impact

Cal Fire has identified wildfire risk areas through the Fire Hazard Severity Zone maps. The Western Riverside County LRA map designates the project area as a non-VHFHSZ. The project would be constructed within roadway rights-of-way and developed or disturbed areas; the project area does not contain and is not adjacent to wildlands. Riverside County Fire Department Station 40 is located at 91350 Avenue 66, approximately one-third of a mile to the east of the project area. The project area has a low risk of wildfire. Therefore, impacts would be less than significant, and no mitigation would be required.

Mitigation Measures:

See **Mitigation Measure TRA-1** in *Section 3.17 Transportation*.

Mitigation Measure HAZ-1: Hazardous Materials Management and Spill Control Plan

Prior to construction the construction contractor is required to submit to CVWD a Hazardous Materials Management Spill Control Plan that includes a project-specific contingency plan for hazardous materials and waste operations. The plan shall be applicable to construction activities and shall establish policies and procedures according to applicable codes and regulations, including but not limited to the California Building and Fire Codes, and federal and California Occupational Safety and Health Administration (OSHA) regulations. Elements of the Plan shall include, but not be limited to the following:

- A discussion of hazardous materials management, including delineation of hazardous material storage areas, access and egress routes, waterways, emergency assembly areas, and temporary hazardous waste storage areas;
- Notification and documentation of procedures; and
- Spill control and countermeasures, including employee spill prevention/response training.

3.10 Hydrology and Water Quality

	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
Would the Project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| i) result in substantial erosion of siltation on- or off-site; | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 off-site; | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iv) impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| v) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| vi) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Discussion

Surface Water

The proposed project is located within the Whitewater River Watershed, which encompasses the entirety of the Coachella Valley. The drainage area of the Whitewater River Watershed is approximately 57.5 square miles and includes four sub-watersheds: Morongo, Shavers, San Gorgonio, and Coachella. The Whitewater River/Coachella Valley Stormwater Channel, which is the primary drainage course in the watershed, runs southeast through the Coachella Valley and drains to the Salton Sea. Water sheet flows southeasterly to the Salton Sea. The principal tributaries of the Whitewater River/Coachella Valley Stormwater Channel include the San Gorgonio River, Snow Creek, Falls Creek, Chino Creek, Mission Creek, Morongo Creek, Tahquitz Creek, Andreas Creek, Palm Canyon Wash, Deep Canyon Creek, and the Palm Valley Channel.

The *Colorado River Basin Water Quality Control Plan* (Basin Plan, Colorado River RWQCB, 1993 and amended through October 2005) designates water quality standards for the Whitewater River/Coachella Valley Stormwater Channel in the form of beneficial uses and numeric and narrative water quality objectives. Beneficial uses of the Whitewater River/Coachella Valley Stormwater Channel include Freshwater Replenishment (FRSH), Contact Water Recreation (REC I; unauthorized use), Non-Contact Water Recreation (REC II; unauthorized use), Warm Freshwater Habitat (WARM), Wildlife Habitat (WILD), and Preservation of Rare, Threatened, or Endangered Species (RARE).

Currently, within the Coachella Valley Stormwater Channel the 17 mile stretch from Dillon Road to the Salton Sea is listed on the State's 303 (d) List of Impaired Water Bodies for Indicator Bacteria. In the 2 mile stretch from Lincoln Street to the Salton Sea The Coachella Valley Stormwater Channel is listed for Polychlorinated Biphenyls (PCBs and the pesticides Toxaphene, Dichlorodiphenyltrichloroethane (DDT), and Dieldrin. The Coachella Valley Stormwater Channel is also listed for Nitrogen/Ammonia, Toxicity, (SWRCB 2016). The Colorado River RWQCB develops and implements total maximum daily loads (TMDLs) to address these impairments and help achieve water quality standards. Water quality is also addressed through compliance with the NPDES stormwater discharge permits issued to municipalities, construction sites and industrial facilities to control pollutants in storm water discharges to local surface waters.

The United States Department of Homeland Security Federal Emergency Management Agency (FEMA) National Flood Insurance Program provides Flood Insurance Rate Maps (FIRM) that identify flood hazard areas, called Special Flood Hazard Areas (SFHA). SFHAs are defined as areas that will be inundated by the flood event having a one percent chance of being equaled or exceeded in any given year. The one percent chance flood is also referred to as the base flood or 100-year flood. SFHAs are labeled as Zone A, Zone AO, Zone AH, Zones A1-30, Zone AE, Zone A99, Zone AR, Zone AR/AE, Zone AR/AO, Zone AR/A1-A30, Zone AR/A, Zone V, Zone VE, and Zones V1-V30. Moderate flood hazard areas, labeled Zone B or Zone X (shaded) are also shown on the FIRM, and are areas between the limits of base flood and the two-tenths percent annual chance (or 500 year) flood. The areas of minimal flood hazard, which are the areas outside the SFHA and higher than the elevation of the two-tenths percent annual chance flood, are labeled Zone C or Zone X (unshaded) (FEMA 2019).

Groundwater

The Coachella Valley Groundwater Basin (California Department of Water Resources [DWR] Basin No. 7-21) underlies the Whitewater River Watershed. The Coachella Valley Groundwater Basin has an estimated storage capacity of 40 million acre-feet (AF) of water within the upper 1,000 feet (CVWD 2016). The Coachella Valley Groundwater Basin is divided into four subbasins: Indio (DWR Basin No. 7-21.01), Mission Creek (No. 7-21.02, Desert Hot Springs (No. 7-21.03, and San Geronio (No. 7-21.04). The Indio Subbasin underlies the project area.

Natural recharge is attributed to surface runoff and subsurface inflow; however, the Indio Subbasin is primarily recharged through groundwater replenishment efforts by CVWD and Desert Water Agency. CVWD operates and maintains three replenishment facilities within the Indio Subbasin: the Whitewater River Groundwater Replenishment Facility, the Thomas E. Levy Groundwater Replenishment Facility, and the Palm Desert Groundwater Replenishment Facility. These facilities recharge imported water.

The Coachella Valley Groundwater Basin is designated by DWR as a medium priority basin and is subject to the provisions of the Sustainable Groundwater Management Act (SGMA). CVWD is the Groundwater Sustainability Agency (GSA) for the majority of the eastern portion of the Indio Subbasin, including the area that underlies the project area.

The RWQCB's designated beneficial uses of the Coachella Valley Groundwater Basin include Municipal and Domestic Supply (MUN), Industrial Service Supply (IND), and Agriculture Supply (AGR). Groundwater supply used for potable uses is generally of high quality; however, CVWD treats delivered groundwater with free chlorine as a precautionary measure prior to distribution for potable use. Some areas of the Coachella Valley Groundwater Basin naturally contain elevated levels of salinity and groundwater quality issues for naturally occurring substances such as uranium, arsenic, chromium, and fluoride have occurred in isolated areas. Additionally, some localized areas have seen elevated nitrate levels. As discussed in *Chapter 2 Project Description*, all three of the SWSs being consolidated as part of the proposed project have shown elevated levels of arsenic in exceedance of state and federal MCLs.

a) Less than Significant Impact with Mitigation Incorporated

Potential water quality impacts associated with construction of the proposed project would be limited to short-term erosion/sedimentation that could occur during construction of the pipeline alignments. The temporary disturbance area, including construction and staging areas, would total approximately 160,000 sq. ft., or no more than four acres. Construction of the proposed project would require coverage under the SWRCB's NPDES General Permit for Discharges of Storm Water Associated with Construction Activity - Construction General Permit (Order 2009-0009-DWQ). The Construction General Permit requires preparation and implementation of a SWPPP containing BMPs to control sediment and other construction-related pollutants in storm water discharges. Such BMPs would include, but are not limited to, general housekeeping practices such as sweeping up of site debris, proper waste disposal procedures, use of tarps on any stockpiles, containment of building materials, and inspection for leaks and spills from construction vehicles and equipment. With implementation of the SWPPP, storm water discharges from the proposed

project site during construction are not expected to violate existing water quality standards or waste discharge requirements set by the RWQCB.

The Whitewater River/Coachella Valley Stormwater Channel is a direct tributary to the Salton Sea, which is considered a Traditionally Navigable Water by the USACE. The Whitewater River/Coachella Valley Stormwater Channel is considered jurisdictional for all three regulatory agencies – USACE, RWQCB, and CDFW. If trenchless technologies are used for the Whitewater River/Coachella Valley Stormwater Channel crossing, and no discharge of dredged or fill materials occurs within the channel, then Section 404 (USACE) and Section 401 (RWQCB) jurisdiction under the CWA would not apply. If trenchless methods are used for the Whitewater River/Coachella Valley Stormwater Channel crossing, and no impacts to species from vibration or potential for release of bentonite through the soil column into a waterbody (called frac-out) occurs, then CDFW would not require a Lake and Streambed Alteration Agreement under Fish & Game Code Section 1600.

Under CWA Section 404(f), activities involving the discharge of dredged or fill material into waters of the United States associated with the “irrigation of crops or livestock watering as part of a normal farming or ranching operation” are not subject to regulation under Section 404. As such, the two agricultural drains at Avenue 66/Lincoln and Avenue 66/Buchanan are exempt from USACE and RWQCB jurisdiction. The agricultural drains are artificially created with no riparian vegetation and are not maintained by natural surface flow; however, they fall under CDFW jurisdiction because they convey surface water that might support species (Land, 2019). For either jack and bore or HDD trenchless crossings under the agricultural drainage channels that does not result in impacts from vibration or frac-out, CDFW would not require a Lake and Streambed Alteration Agreement under California Fish & Game Code Section 1600.

Furthermore, per **Mitigation Measure BIO-4**, a Frac-Out Prevention and Contingency Plan would be completed by the HDD contractor. The Plan would verify recommended depth of the pipeline under the Whitewater River/Coachella Valley Stormwater Channel and/or agricultural drains based on soil properties and risk for potential frac-out during the HDD trenchless construction phases. The pipeline would be designed at depths from the channel bed to minimize risk for the release of HDD drilling fluid into the channel. With implementation of the Frac-Out Prevention and Contingency Plan, the risk of degrading surface water quality or impacting species at the Whitewater River/Coachella Valley Stormwater Channel or agricultural drain crossings would be less than significant. With mitigation, surface water quality impacts would be less than significant.

b) Less than Significant Impact

As discussed in *Section 3.14 Population and Housing*, the proposed project would consolidate existing SWSs and would not induce population growth or increase water demands. Therefore, the proposed project would not be expected to decrease groundwater supplies or interfere with groundwater recharge efforts. Impacts would be less than significant, and no mitigation would be required.

c) Less than Significant Impact

The proposed project would not result in a change in the local drainage patterns of the project area. The pipelines would be installed below ground, surfaces would be restored to pre-construction conditions and only minor changes in impervious surface areas would occur as a result of the pressure reducing station, associated onsite piping, meters, hydrants and valves. Therefore, no changes in drainage patterns would occur and no impacts to the existing storm drain system in the project area would be expected. All construction activities would be conducted in accordance with BMPs specified in the construction SWPPP to prevent erosion and siltation, and other construction-related pollutants such as potential leaks from construction equipment.

Portions of the project area are in FEMA SFHAs Zone AE (100-year flood zone) and Zone X (shaded) (500-year flood zone). The Manuela Garcia MHP and Seferino Huerto MHP are both located within the 100-year flood zone (Zone AE).

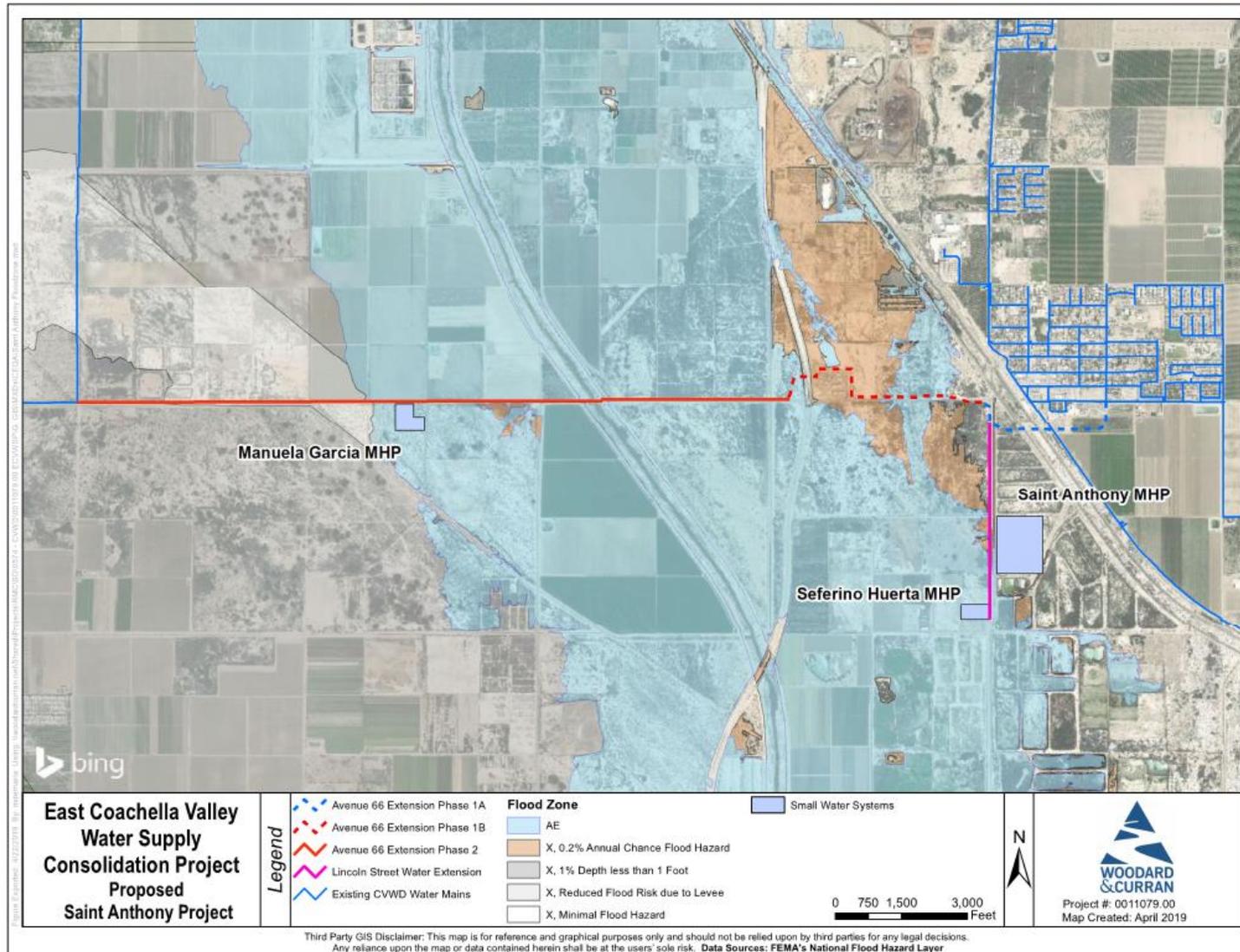
The majority of Avenue 66 is in the 100-year flood zone (Zone AE), while a small portion between Lincoln Street and Highway 86 is designated as a 500-year flood zone (Zone X [shaded]). The proposed pressure reducing station would be located within the 100-year flood zone (Zone AE). Within the project area, the majority of Lincoln Street is not within a flood hazard zone (Zone X [unshaded]), however, Lincoln Street is located within the 500-year flood zone (Zone X [shaded]) for about 1,300 feet south of Avenue 67 and in the 100-year flood zone (Zone AE) south of that. Saint Anthony MHP is not within a flood hazard zone (Zone X [unshaded]).

FEMA flood hazard zones within the project area are shown in **Figure 3-6**. Although portions of the proposed project would be located within 100-year and 500-year flood hazard zones, the proposed project would include installation of underground water distribution pipelines, a pressure reducing station, and associated meters, hydrants and valves that would not risk release of pollutants due to flooding upon completion of construction. Thus, potential impacts to drainage patterns resulting in erosion, flooding, or water quality issues would be less than significant and no mitigation measures would be required.

Mitigation Measures:

See **Mitigation Measure BIO-4** in *Section 3.3 Biological Resources*.

Figure 3-6: FEMA Flood Insurance Rate Map



3.11 Land Use and Planning

Would the Project:	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The project area is located in the unincorporated Riverside County near the unincorporated community of Mecca. According to the *Riverside County Eastern Coachella Valley Area Plan* (County of Riverside 2016), the project area includes mixed-use, commercial retail, commercial tourist, rural residential, very low and low density residential, tribal lands and agriculture land use designations.

a) No Impact

The proposed project would construct approximately 27,000 linear feet of pipelines, a pressure reducing station, and associated onsite piping, meters, hydrants and valves to consolidate three independent, privately owned SWSs into CVWD’s potable water system. Construction of the proposed pipelines would temporarily affect adjacent land uses through increased dust, noise, and traffic, but impacts would cease upon completion of construction and would not permanently affect the existing surrounding land uses. The majority of project features (other than fire hydrants and meters) would be located underground and would not result in a physical barrier within the existing community. No impacts would occur, and no mitigation would be required.

b) No Impact

The proposed project would construct water pipelines to consolidate three independent, privately owned SWSs into CVWD’s potable water system and would not conflict with land use plans, policies, or regulations. The pipelines would be installed below-grade within roadway rights-of-way and on public and private lands and would comply with Riverside County’s land use policies and regulations. All surfaces would be restored to pre-construction conditions upon completion of construction. Therefore, the proposed project would be consistent with all applicable land use plans, policies and regulations of agencies with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. No impacts would occur, and no mitigation would be required.

Mitigation Measures: None required or recommended.

3.12 Mineral Resources

	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

Mineral resource extraction is an important component of Riverside County’s economy. Riverside County has extensive deposits of clay, limestone, iron, sand, and aggregates (County 2015). However, according to the *Riverside County General Plan Open Space Element* (County of Riverside 2015) and the California DOC CGS *Mineral Land Classification* online mapping tool (DOC 2015), the project area is located in an unstudied area and has no Mineral Resource Zone designation. There are not mineral resource extraction facilities within the project area.

a, b) Less than Significant Impact

The project area is located in an unstudied area and has no MRZ designation. The proposed project would install water distribution pipelines within roadway rights-of-way and on public or private developed lands such as the MHP properties. Because the construction activities would primarily occur on developed land, the proposed project would not result in a substantial loss of availability of locally or regionally important mineral resources and impacts would be less than significant.

Mitigation Measures: None required or recommended.

3.13 Noise

Would the Project result in:	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

Potential noise levels are compared to local ambient noise standards, within the context of the existing ambient noise setting. The term, “ambient noise” refers to the composite of noise from all perceptible sources. It constitutes the existing level of environmental noise at a given location (County of Riverside 2015). A decibel (dB) is a unit for measuring the relative amplitude of a sound equal approximately to the smallest difference normally detectable by the human ear, the range of which includes approximately one hundred thirty (130) decibels on a scale beginning with zero decibels for the faintest detectable sound. A-weighting (dBA) means the standard A-weighted frequency response of a sound level meter, which de-emphasizes low and high frequencies of sound in a manner similar to the human ear for moderate sounds. Maximum sound level (L_{MAX}) means the maximum sound level measured on a sound level meter (County of Riverside 2007). Community Noise Equivalent Level (CNEL) is the average equivalent A-weighted sound level during a 24-hour day, obtained after addition of five decibels to sound levels in the evening from 7pm to 10pm and after the addition of 10 decibels to sound levels in the night from 10pm to 7am. Day-Night Average Level (L_{dn}) is the average equivalent A-weighted sound level during a 24-hour day, obtained after addition of 10 decibels to sound levels in the night from 10pm to 7am. CNEL and L_{dn} both represent daily levels of noise exposure averaged on an annual or daily basis (County of Riverside 2015).

A series of land uses have been deemed noise sensitive land uses by the State of California. These land uses require a serene environment as part of the overall facility or residential experience. Many of these facilities depend on low levels of sound to promote the wellbeing of the occupants. These uses include, but are not necessarily limited to, schools, hospitals, rest homes, long term care facilities, mental care facilities, residential uses, places of worship, libraries, and passive recreation areas (County of Riverside 2015).

Groundborne vibration can be described by both its amplitude and frequency. Amplitude may be characterized by particle velocity, which is measured in inches or millimeters per second. Vibration can be felt outdoors, but the perceived intensity of vibration impacts is much greater indoors, due to the shaking of the structure. Some of the most

common sources of vibration come from trains, transit vehicles, construction equipment, airplanes, and large vehicles. Several land uses are especially sensitive to vibration, and therefore have a lower vibration threshold. These uses include, but are not limited to, concert halls, hospitals, libraries, vibration-sensitive research operations, residential areas, schools, and offices (County of Riverside 2015).

The *Riverside County General Plan Noise Element* (County of Riverside 2015) provides a systematic approach to identifying and appraising noise problems in the community; quantifying existing and projected noise levels; addressing excessive noise exposure; and community planning for the regulation of noise. The element includes policies, standards, criteria, programs, diagrams, a reference to action items, and maps related to protecting public health and welfare from noise (see **Table 3-10** and **Table 3-11**).

Table 3-10: County of Riverside Land Use Compatibility for Community Noise Exposure

Land Use Category	Range of “Normally Acceptable” Community Noise Exposure Level (L _{dn} or CNEL, dBA)					
	55	60	65	70	75	80
Residential-low density single family, duplex, mobile homes						
Residential-multiple family						
Transient lodging-motels, hotels						
Schools, libraries, churches, hospitals, nursing homes						
Playgrounds, neighborhood parks						
Golf courses, riding stables, water recreation, cemeteries						
Office buildings, businesses, commercial, and professional						
Industrial, manufacturing, utilities, agriculture						

Source: *County of Riverside General Plan Noise Element* 2015.

Table 3-11: Reaction to Typical Vibration Levels

Vibration Level Peak Particle Velocity (inches/second)	Human Reaction
0.0059-0.0188	Threshold of perception, possibility of intrusion
0.0787	Vibrations readily perceptible
0.0984	Continuous vibration begins to annoy people
0.1968	Vibrations annoying to people in buildings
0.3937-0.5905	Vibrations considered unpleasant when continuously subjected and unacceptable by some walking on bridges

Source: *County of Riverside General Plan Noise Element* 2015.

Riverside County Ordinance No. 847 Regulating Noise establishes countywide standards regulating noise and regulates noise in order to protect the health, safety, and general welfare of Riverside County residents. According to Ordinance 847, sound emanating from capital improvement projects of a government agency are exempt from the provisions of the ordinance. Therefore, the sound levels set in the County of Riverside Noise Ordinance would not apply to the proposed project. However, they can be used to understand acceptable sound levels in the region. The ordinance stipulates that sound levels shall not exceed the exterior sound level standards at neighboring property lines shown in **Table 3-12**.

Table 3-12: County of Riverside Sound Level Standards

General Plan Component	General Plan Land Use Designation	Maximum Decibel Level (dB L _{MAX})	
		7am – 10pm	10pm – 7am
Community Development	Medium High Density Residential (MHDR)	55	45
	Medium Density Residential (MDR)	55	45
Rural Community	Low Density Residential (LDR)	55	45
Agriculture	Agriculture (AG)	45	45

Source: Riverside County Ordinance 847 Noise.

Existing Conditions

The existing noise setting in the project area consists of residential activities and traffic noise from Highway 86 and other surrounding roadways. Base year noise levels were assessed for the *County of Riverside General Plan* (County of Riverside 2015). **Table 3-13** summarizes the existing traffic noise levels around the project area.

Table 3-13: County of Riverside Base Year Condition (2007) Traffic Noise Levels

Roadway Segment	Average Daily Trips (ADT)	L _{dn} (dBA) 50 feet from centerline of outermost lane	Centerline to 60 L _{dn} (feet)
Highway 86 between southern city limits of Coachella and Avenue 66 (approx. one mile northwest of Saint Anthony MHP)	37,900	78.6	1,144
Highway 86 between Avenue 74 and Pierce Street (approx. one mile west of Saint Anthony MHP)	7,700	71.5	354

Source: *County of Riverside General Plan Appendix I-1*.

The closest airport to the project area is the Jacqueline Cochran Regional Airport; however, the proposed project does not overlap the airport’s forecasted noise contours (County of Riverside 2015, Appendix I-1, Figure 43).

a) Less than Significant with Mitigation Incorporated

The project has the potential to expose persons to noise resulting from construction activities and operations. Noise within the County of Riverside is regulated under the County’s Noise Ordinance and acceptable noise levels are established in the County’s *General Plan* (see discussion above).

Construction is anticipated to last 12 months. Construction activities would result in temporary noise increases. Construction noise levels would fluctuate depending on the construction phase, equipment type, and duration of use; distance between noise source and receptor; and presence or absence of existing barriers between noise source and receptor. A list of construction equipment that may be used at any one time during construction can be found in *Section 2 Project Description*. The typical noise level of each piece of construction equipment that would be used for the project is shown in **Table 3-14**.

Table 3-14: Typical Construction Equipment Noise Levels

Equipment	Typical Noise Levels (dBA, at 50 feet)
Excavators	81
Backhoe	78
Dump truck	76
Front end loader	79
Water trucks	84 ¹
Pavers	77
Roller	80
Flat-bed delivery trucks	74
Forklifts	75 ¹
Concrete mixer truck	79
Jack hammer	89
Auger Drill Rig	85
Horizontal Boring Hydraulic Jack	80
Soil Mix Drill Rig	80
Source: FHWA, 2006.	
1. Water truck noise level was assumed to be comparable to a tractor. Forklift noise level was assumed to be comparable to a man lift.	

In general, project construction would be temporary and sporadic and would vary depending on the type of component being constructed. Construction along the pipeline alignments would continuously move from one location to another, as pipeline installation proceeds from one segment to the next. Thus, noise levels would affect any one receptor for a short duration of time. Construction using jack-and-bore methods, while still intermittent and sporadic depending on the phase of construction, would occur for an overall longer period of time (compared to trenched pipeline installation), and thus expose people to elevated noise levels during the construction period.

During construction, truck traffic would generate noise levels along haul routes. Construction would involve 4 to 5 round-trip material delivery and/or soil export truck trips per day. Noise sensitive land uses located adjacent to proposed project construction areas and along haul routes would be subject to truck noise during construction. Truck noise depends upon vehicle speed, load, terrain, and other factors. The effects of construction -related truck traffic would depend on the level of background noise already occurring at a particular receptor site, and the existing ambient noise levels. In quiet environments, truck noise would be more noticeable than where the existing ambient noise level is high.

According to the Riverside County Noise Ordinance, Ordinance 847, sound emanating from capital improvement projects of a government agency are exempt from the provisions of the ordinance. Therefore, impacts-related to construction noise associated with the proposed project would be exempt from Riverside County Noise Ordinance standards. Furthermore, construction would occur during daytime hours consistent with the limits on private construction activities in the Noise Ordinance. In addition, the existing conditions in the project area are not quiet; the area is already subject to elevated ambient noise levels due to prominent traffic noise. Nonetheless, due to the close proximity of construction activities to residences, impacts from construction noise would be potentially significant. With implementation of **Mitigation Measure NOI-1**, which requires the construction contractor to implement the best available noise control techniques and equipment, construction-related noise levels would be reduced to less than significant.

Once operational, the proposed below-ground conveyance pipelines are not expected to result in a permanent increase in noise, other than noise associated with occasional vehicle maintenance trips. Operational vehicle maintenance trips

would occur during daytime hours, between 7am and 8pm, consistent with the Riverside County Noise Ordinance. Therefore, the project would have less-than-significant long-term noise impacts.

b) Less than Significant with Mitigation Incorporated

Construction also has the potential to cause groundborne vibration and groundborne noise. Generally, a project would result in a significant impact if it produced groundborne vibration levels equal to or in excess of 0.1968 in/sec peak particle velocity (PPV) (see **Table 3-11**). Typical vibration levels for construction equipment are shown in **Table 3-15**.

Table 3-15: Typical Construction Equipment Vibration Levels

Equipment	Typical Vibration Source Levels PPV at 25 feet (in/sec)
Vibratory roller	0.210
Caisson drilling	0.089
Loaded trucks	0.076
Jack hammer	0.035
Small bulldozer	0.003

Source: Source: FTA, 2006.

As shown in **Table 3-15**, if a vibratory roller is used for construction of the proposed project, for example to replace roadways, it would result in groundborne vibration at levels that would cause annoyance to people in buildings at distances of 25 feet. The drilling equipment for the proposed trenchless pipeline segments would not be expected to result in significant vibration levels. According to the Federal Transit Administration Transit Noise and Vibration Impact Assessment (FTA 2006), groundborne vibration from construction attenuates based on peak particle velocity of the equipment and distance from the equipment to the receiver. Groundborne vibration from construction of the project is expected to attenuate to reach a less than significant level at a distance of 40 feet.

Once operational, the proposed below-ground conveyance pipelines are not expected to result in a permanent source of groundborne vibration, other than vehicles associated with occasional maintenance trips. Operational vehicle maintenance trips would occur during daytime hours, between 7am and 8pm, consistent with the Riverside County Noise Ordinance. Therefore, the project would have less-than-significant long-term vibration impacts.

Potential impacts from construction-related groundborne vibration would be potentially significant. However, with implementation of **Mitigation Measure NOI-1**, construction-related vibration levels would be reduced to less than significant.

c) Less than Significant Impact

The Jacqueline Cochran Regional Airport is located in the westerly part of the town of Thermal, approximately five miles north of the proposed project area. The proposed project would construct approximately 27,000 linear feet of pipelines, a pressure reducing station, and associated onsite piping, meters, hydrants and valves to consolidate three independent, privately owned SWSs into CVWD’s potable water system. Although the proposed project would include expansion of CVWD’s municipal water delivery infrastructure, it would serve existing communities and does not propose new housing or businesses that would be exposed to excessive noise levels. Thus, impacts related to aircraft noise would be less than significant.

Mitigation Measures:

To lessen possible noise and vibration impacts, the project shall implement practical noise control measures **Mitigation Measure NOI-1** for construction. Impacts are considered less than significant with mitigation incorporated.

Mitigation Measure NOI-1: Noise and Vibration Control During Construction

CVWD shall incorporate into the construction contract specifications the following noise and vibration control measures to be implemented by the construction contractor:

- Prior to construction, the Construction Contractor shall provide [CVWD-approved] written notification to residents within 500 feet of the proposed facilities undergoing construction shall be provided, identifying the type, duration, and frequency of construction activities. Notification materials shall be provided in English/Spanish translation and identify a mechanism for residents to contact CVWD's Project Manager related to noise or vibration concerns.
- During construction, the Construction Contractor shall use equipment (e.g., jack hammers, pavement breakers, and rock drills) which is hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatically powered tools is unavoidable, an exhaust muffler on the compressed air exhaust would be used. This muffler can lower noise levels from the exhaust by up to 10 dBA. External jackets on the tools themselves would be used where feasible, and this could achieve a reduction of 5 dBA. Quieter procedures will be used such as drilling rather than impact equipment whenever feasible.
- During construction, the Construction Contractor shall comply with compaction standards for backfill. Vibration generated during soil compaction may be minimized by using a small compactor.
- During sheetpile driving for trench excavation, the Construction Contractor shall use the following measures: pushing the sheetpile in as far as possible with non-vibratory equipment (e.g., excavator) before using the vibrator; using a small, hand-operated vibratory hammer or one with a different operational frequency to further reduce the vibration potential; flooding the soils before tamping with the vibrator; and/or operating vibratory equipment with "throttling" when a vibrator must be used.
- All equipment and trucks used by the Construction Contractor for project construction shall use the best available noise control techniques (including mufflers, use of intake silencers, ducts, engine enclosures and acoustically attenuating shields or shrouds) and be maintained in good operating condition to minimize construction noise impacts. All internal combustion engine-drive equipment shall be fitted with intake and exhaust mufflers which are in good condition.
- During construction, the Construction Contractor shall prohibit unnecessary idling of internal combustion engines. In practice, this would mean turning off equipment if it would not be used for five or more minutes.
- During construction, the Construction Contractor shall locate stationary noise-generating construction equipment, such as air compressors and generators, as far as possible from homes and businesses.
- The Construction Contractor shall locate staging areas as far as feasibly possible from sensitive receptors.

3.14 Population and Housing

	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
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 checked="" type="checkbox"/>	<input 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 proposed project is located in unincorporated Riverside County to the west of the unincorporated community of Mecca within the eastern Coachella Valley. The project area is relatively rural and sparsely developed with residential land uses, commercial, and agricultural areas. As shown in **Table 2-2**, the proposed project would consolidate three SWSs that include a total of 122 service connections and an estimated population of 488 with CVWD’s municipal water system.

a) Less than Significant

The proposed project involves expansion of CVWD’s municipal water delivery infrastructure within its service area; the direct use would serve specific existing communities that currently rely on SWSs with a reliable potable water source from CVWD’s municipal water system. The proposed expansion of CVWD’s municipal water distribution infrastructure, and subsequent indirect growth, is consistent with planned growth in the area. The *Riverside County General Plan Eastern Coachella Valley Area Plan* (County of Riverside 2012) expected the Eastern Coachella Valley region to double its population between 2010 and 2020. Therefore, the proposed project would not induce substantial unplanned population growth, directly or indirectly, in the project area. Impacts would be less than significant, and no mitigation would be required.

b) No Impact

The proposed project would construct water distribution pipelines to consolidate three independent, privately owned SWSs into CVWD’s municipal water system and would not displace existing people or housing. Therefore, there would be no impacts related to displacement of people or housing would occur and no mitigation would be required.

Mitigation Measures: None required or recommended.

3.15 Public Services

	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
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 public services:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

Riverside County Fire Department, in cooperation with Cal Fire, provides fire protection and emergency services to unincorporated areas of Riverside County. Station 40 is located at 91350 Avenue 66 in the unincorporated community of Mecca, approximately one-third mile to the east of the project area. The Riverside County Sheriff's Department provides law enforcement services, and the California Highway Patrol provides traffic enforcement services within the project area. The Riverside County Sheriff's Thermal Station is located at 86625 Airport Boulevard approximately five miles to the north of the project area. There are no schools located within the project area. The Mecca Elementary School is located approximately one-half mile to the northeast of the project area, the Saul Martinez Elementary School is located approximately one mile to the east of the project area, and the Las Palmitas Elementary School, Toro Canyon Middle School, and Desert Mirage High School are located approximately 1.5 miles to the west of the project area. There are no parks located within the project area. The Mecca Sports Complex is located approximately one-third mile to the northeast of the project area.

a) No Impact

The proposed project would not change existing demand for public services (e.g., fire and police protection, schools, parks, libraries, or health clinics) because the proposed project would serve existing communities and would not significantly or directly induce population growth (see *Section 3.13 Population and Housing*). In addition, the O&M requirements for the proposed project would be minimal, and therefore would not result in an increase in the need for new staff from public protection services entities. As implementation of the proposed project would not change the demand for any public services, it would not require additional equipment or resources for those public service providers. The proposed project would have no impact on public services, and no mitigation would be required.

Mitigation Measures: None required or recommended.

3.17 Transportation

Would the Project:	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

Transportation in the Coachella Valley is planned through the Riverside County Transportation Commission (RCTC) and the Coachella Valley Association of Governments (CVAG) in a regional effort. The RCTC plans and implements transportation and transit improvements and assists local governments with funding for local streets and roads to promote accessible transportation throughout Riverside County. RCTC's current *Congestion Management Program* (CMP; RCTC 2011) was adopted in December 2011 and is planned to be incorporated in the *Long Range Transportation Plan* (LRTP). The LRTP, which will be published later in 2019, will take a comprehensive review of projects on the state highway, regional arterials, rail and bus, freight network, and active transportation. According to the 2011 CMP, all roadway segments in the Coachella Valley in 2011 were operating at acceptable levels of service (i.e., were not congested) except for Ramon Road between Bob Hope Drive and Interstate 10, approximately 25 miles northwest of the proposed project area (RCTC 2011).

The CVAG *Transportation Prioritization Study* (CVAG 2017b) was developed for the evaluation of the regional transportation system needs within the Coachella Valley and to assist CVAG in making funding decisions. The CVAG *Active Transportation Plan* (CVAG 2016) provides goals and objectives related to alternative transportation within the Coachella Valley, and was prepared in conjunction with the *Transportation Prioritization Study*. The *Transportation Prioritization Study* includes a multipurpose path along Airport Boulevard between Polk Street and the Whitewater River/Coachella Valley Stormwater Channel (CVAG 2017b).

The Southern California Association of Governments (SCAG) *Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS; SCAG 2016) identifies strategies to meet mobility of all modes, legislative, financial and air quality requirements in the six county area of Southern California. It is updated every four years, most recently in June 2016. Most of the projects identified in the Coachella Valley focus on expanding the Sunline Transit Agency facilities (SCAG 2016).

Existing circulation around the SWSs typically consists of two-lane roads with no bicycle or pedestrian facilities. As shown in **Table 3-13**, Highway 86 where it runs adjacent to the proposed project area had a measured average daily number of vehicle trips of between 7,700 and 37,900 in 2007.

a) Less than Significant with Mitigation Incorporated

Construction is anticipated to last 12 months and occur on weekdays between the hours of 7 am and 6 pm. During construction, the project would generate trips associated with construction crews and materials deliveries. Assuming a rate of construction of 150 LF per day, construction would generate up to 60 round-trip trips per day, which includes trips for off hauling of export material, delivery of materials, and construction worker commuting. All construction activities would occur within the County of Riverside roadway rights of way, areas adjacent to the roadways, and SWS properties.

Construction-related traffic would be temporary, and potential traffic-related impacts would not occur in the same location over the 12-month construction period but would rather move along the pipeline alignment. All disturbed areas would be restored to original grade. As such, temporary construction impacts are not expected to have a significant impact related to the RCTC CMP, the CVAG studies, or the SCAG RTP/SCS, which focus on long-term, regional circulation projects.

Once operational, the project would not conflict with these regional transportation plans because it would install below-ground pipelines, a pressure reducing station, and associated onsite piping, meters, hydrants and valves that would not have a permanent impact on circulation. CVWD would continue to operate its water system with no operational modifications using standard vehicles. Long-term impacts on the circulation system plans would be less than significant.

Although construction impacts would not be substantial, construction of the proposed project may necessitate individual traffic lane closures. To ensure the appropriate traffic controls are implemented and potential traffic impacts related to lane closures are less than significant, the proposed project shall implement **Mitigation Measure TRA-1**. Project coordination with emergency responders and development of an approved Traffic Control Plan would result in potential traffic impacts related to road closures and detours would be less than significant.

b) No Impact

CEQA Guidelines Section 15064.3, subdivision (b) stipulates criteria for analyzing transportation impacts in terms of “vehicle miles traveled” for land use projects and transportation projects. VMT refers to the amount and distance of automobile travel attributable to a project.

Construction of the proposed project would involve temporary trips associated with workers, delivery of construction supplies and equipment, and hauling materials to and from the site. These trips would be temporary over the 12 month duration of construction and would not result in a perceivable increase in vehicle miles traveled that would exceed County thresholds of significance. Truck trips associated with operation and maintenance would be limited and incorporated into CVWD’s existing operation and maintenance program. The VMT generated during operation of the proposed project would be minimal. Therefore, the project would not be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and there would be no impact.

c) No Impact

The project would install 27,000 linear feet of pipelines, a pressure reducing station, and associated onsite piping, meters, hydrants and valves which would not have a permanent impact on geometric roadway design. All disturbed areas would be restored to original grade. CVWD would continue to operate its water system with no operational modifications using standard vehicles, which would not introduce incompatible uses to roadways. The project would not result in transportation hazards.

d) Less than Significant with Mitigation Incorporated

As explained under Impact a), above, construction of the project would generate trips associated with construction crews and materials deliveries and may necessitate individual traffic lane closures. Lane closures and other construction activities have the potential to result in inadequate access for emergency vehicles. Traffic control requirements would require that emergency crews have access, as needed, and that the contractor coordinates the location of the work daily for routing of emergency vehicles. Traffic control would also require the contractor to make reasonable efforts, wherever possible, to provide landowners access to their property and patrons access to businesses during execution of the work. To ensure that project construction would not interfere with emergency response times, the proposed project would implement **Mitigation Measure TRA-1**. With the incorporation of traffic control measures identified in **Mitigation Measure TRA-1**, impacts would be less than significant.

Mitigation Measures:

To lessen possible circulation and emergency access impacts during construction, the project shall implement practical transportation control measure **Mitigation Measure TRA-1**. Impacts are considered less than significant with mitigation incorporated.

Mitigation Measure TRA-1: Traffic Control Plan

Prior to construction, CVWD shall require its construction contractor to implement an approved Traffic Control Plan, to the satisfaction of the CVWD construction inspector and the County. The components of the Traffic Control Plan shall include:

- Identification of construction staging site locations and potential road closures,
- Alternate routes of traffic detours, including emergency response contact information,
- Planned routes for construction-related vehicle traffic (haul routes), and
- Identification of alternative safe routes to maintain pedestrian safety during construction.

CVWD's Project Manager shall coordinate with the police, fire, and other emergency services to alert these entities about potential construction delays, project alignment, and construction schedule. CVWD shall minimize the duration of disruptions/closures to roadways and critical access points for emergency services. The Traffic Control Plan shall provide for traffic control measures including flag persons, warning signs, lights, barricades, and cones to provide safe passage of vehicular, bicycle and pedestrian traffic and access by emergency responders. The Traffic Control Plan shall be submitted to CVWD's Project Manager and construction inspector for review and approval prior to construction.

CVWD's construction inspector shall have the construction schedule and Traffic Control Plan reviewed by the County of Riverside to ensure construction of the proposed project does not conflict with construction activities associated with other construction projects that may be occurring at the same time in the vicinity.

3.18 Tribal Cultural Resources

	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

A *Cultural Resources Assessment Report* was prepared in April 2019 by Rincon Consultants, Inc. for the proposed project. A field survey of the project area was conducted on February 12-13, 2019 and April 18, 2019. The *Cultural Resources Assessment Report* is provided in **Appendix C**.

On January 15, 2019, Rincon conducted a search of cultural resources records at the Eastern Information Center at the University of California, Riverside, and a search of the Sacred Lands File was requested from the Native American Heritage Commission (NAHC). *Section 3.5 Cultural Resources* provides an overview of the Eastern Information Center and other database searches that were conducted for the Project. According to the search, 39 previous cultural resources studies have been conducted within a one-half-mile radius of the project area. In addition, Dokken Engineering conducted a cultural resource assessment of portions of the project area north of Avenue 66 for the Phase 1b pipeline extension (see **Appendix C**). Although this report is not yet on file at the Eastern Information Center, the results of the report were included in the cultural resource assessment. Eighteen cultural resources have been documented within a one-half-mile radius of the project area. Two of the previously recorded historical structures, Avenue 66 (P-33-020844) and Lincoln Street (P-33-020839), intersect the project area; however, they were determined not to be eligible for listing on the NRHP and CRHR. No cultural resources were discovered during the field surveys.

Results of the Sacred Lands File Search by the NAHC did not indicate the presence of Native American sacred lands within the vicinity of the project area. In addition to the search of the Sacred Lands File, the NAHC identified 19 Native

American contacts who may have knowledge of cultural resources of Native American origin at the project site. Rincon prepared and mailed letters to each of these groups on behalf of CVWD on January 22, 2019.

On February 20 and 22, 2019, Rincon followed up with the Native American contacts who had not yet replied. Twelve responses were received from this outreach effort. A summary of each response received as of March 21, 2019 follows.

- On January 28, 2019, Rincon received a letter from Travis Armstrong, Tribal Historic Preservation Office (THPO) for the Morongo Band of Mission Indians, who stated the Tribe has no additional information to provide at this time. He indicated the Morongo Band of Mission Indians would defer to other tribes in the area when the lead agency initiates formal consultation for the project.
- On January 29, 2019, Rincon received a letter from Judy Stapp, Director of Cultural Affairs for the Cabazon Band of Mission Indians. The letter stated the Tribe does not have specific archival information on the site and the project is outside of its current reservation boundaries.
- On January 30, 2019, Rincon received a letter from Lacy Padilla, Archaeological Technician for the Agua Caliente Band of Cahuilla Indians THPO. The letter stated the project is not in the boundaries of the Tribe's reservation but is in the Tribe's Traditional Use Area. She deferred to the Augustine Band of Cahuilla Indians and Torres Martinez Desert Cahuilla Indians, stating that this letter concluded the Tribe's consultation efforts for the project.
- On February 8, 2019, Rincon received a letter from Sarah Bliss, Cultural Resources Manager, of the Twenty-Nine Palms Band of Mission Indians. She stated that though the THPO is not aware of specific cultural resources in the project area, the project is in the Chemehuevi Traditional Use Area and may have impacts to cultural resources that concern the Tribe. The THPO requests the completed report from the lead agency for evaluation.
- On February 20, 2019, Amanda Vance, Chairperson of the Augustine Band of Cahuilla Indians, responded in a letter stating the Tribe did not have any specific information on cultural resources in the project area. She encouraged Rincon contact other Tribes in the area for information and to contract with a monitor qualified in Native American cultural resources identification for onsite ground disturbance.
- On February 20, 2019, Rincon spoke on the phone with Bobby Ray, the Cultural Director for the Cahuilla Band of Indians. He stated he had no specific knowledge of cultural resources in the area. He deferred to Torres Martinez Desert Cahuilla Indians.
- On February 20, 2019, Rincon had a phone call with Joseph Ontiveros, the Cultural Director for the Soboba Band of Luiseño Indians. Mr. Ontiveros stated the Tribe would defer to Torres Martinez Desert Cahuilla Indians.
- On February 22, 2019, Rincon spoke on the phone with Steven Estrada, Chairperson for the Santa Rosa Band of Mission Indians. Mr. Estrada stated the Tribe would defer further consultation and any monitoring efforts to Torres Martinez Band of Cahuilla Indians.
- On February 22, 2019, Rincon spoke on the phone with Charles Wood, Chairperson for the Chemehuevi Indian Reservation. Mr. Wood stated the Tribe did not have any specific information or concerns and would like to defer to tribes closer to the project area.
- On February 22, 2019, Rincon corresponded with Michael Mirelez, Cultural Resource Coordinator for the Torres Martinez Desert Cahuilla Indians. Mr. Mirelez stated that although the project is outside of the Tribe's

reservation, it is in their Traditional Use Area. The Tribe has concerns regarding inadvertent discoveries. Mr. Mirelez requested copies of all cultural reports, formal government-to-government consultation, and Tribal monitoring during all initial ground-disturbing activities, including survey and testing.

- On February 26, 2019, Rincon received an email from Dorothy Willis of the Los Coyotes Band of Mission Indians. Ms. Willis stated that she had discussed the project with Jacob Norte, the Tribe's Environmental Programs Director, and he had no comments on the project.
- In a letter dated March 6, 2019, the Colorado River Indian Tribe's (CRIT) THPO requested that all prehistoric cultural resources, including both known and yet-to-be-discovered sites, be avoided. If avoidance of the site is infeasible, then the THPO requested the resources be left *in situ* or reburied in a nearby area after consultation. In addition, they requested the CRIT THPO be notified within 48 hours of discovering any human remains or objects subject to provision of the Native American Graves Protection and Repatriation Act, or cultural resources such as sites, trials, and artifacts.

Assembly Bill (AB) 52 Consultation

AB 52 (Gatto, 2014) established a formal consultation process between a lead agency and all California Native American Tribes regarding tribal cultural resource evaluation. AB 52 mandates that a lead agency shall provide formal written notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have previously requested notice. The AB 52 consultation is initiated early in the project review phase by written notification including a brief description of the proposed project and its location, and the lead agency contact information. The Native American tribal government has 30 days to request project-specific consultation pursuant to this section (Public Resources Code §21080.1).

As a part of the consultation pursuant to PRC Section 21080.3.1, the parties may propose mitigation measures, including, but not limited to, those recommended in Section 21084.3, capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource. If the California Native American tribe requests consultation regarding alternatives to the project, recommended mitigation measures, or significant effects, the consultation shall include those topics. The consultation may include discussion concerning the type of environmental review necessary, the significance of tribal cultural resources, the significance of the project's impacts on the tribal cultural resources, and, if necessary, project alternatives or the appropriate measures for preservation or mitigation that the California Native American tribe may recommend to the lead agency. Further, consultation shall be considered concluded when either of the following occurs: (1) The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource, or (2) A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.

In May 2019, CVWD initiated AB 52 with local Native American tribal governments having previously requested to consult under AB 52. As of June 2019, CVWD environmental staff received written formal requests for consultation from two tribes. Staff has met with both tribes to discuss the project in depth. CVWD continues to coordinate project specifics with the two local tribes and has conditioned the project through mitigation with providing a Native American tribal monitor during initial earth-disturbing construction activities such as grubbing, clearing, and excavation.

ai-aii) Less than Significant with Mitigation Incorporated

A project-level *Cultural Resources Assessment Report* (**Appendix C**) was prepared to identify potential impacts to cultural resources, including tribal cultural resources that would result from the proposed project. Much of the project area has been previously disturbed by roadway development, housing, commercial development and agricultural activities, and therefore, the possibility of encountering intact surface tribal cultural resources is considered low;

however, with construction projects involving excavation there is potential for ground-disturbing activities to expose previously unrecorded tribal cultural resources.

In addition, the *Cultural Resources Assessment Report* concluded that the lack of surface evidence of archaeological remains does not preclude their subsurface existence. The multiple prehistoric archaeological resources documented on the adjacent Torres Martinez Indian Reservation, some of which contain buried cultural deposits, suggest the western portion of the project APE has a moderate to high sensitivity for prehistoric archaeological remains. The results of the 2019 field survey revealed surficial deposits have been disturbed throughout much of the APE by the construction and maintenance of roadways and mobile home parks. These previous ground-disturbing activities are expected to be limited to the upper few feet of sediment. Given the maximum depth of ground disturbance in this portion of the APE will be eight feet below ground surface, it is anticipated the water pipeline installation will extend into undisturbed native sediments. These excavations have the potential to impact buried prehistoric archaeological resources potentially present along Avenue 66 and the portion of the APE extending onto the Torres Martinez Indian Reservation.

The following mitigation measures will be implemented and are designed to avoid or lessen potential impacts to a tribal cultural resource.

Mitigation Measure CUL-1 requires the initial ground-disturbing activities be observed by an archaeological and Native American monitor.

Mitigation Measure CUL-2 requires that all earth disturbing work be temporarily suspended if cultural resources, including tribal cultural resources, are discovered during construction.

Mitigation Measure CUL-3 ensures compliance with State policy regarding an unanticipated discovery of human remains. With implementation of **Mitigation Measures CUL-1, CUL-2, and CUL-3**, potential impacts resulting in a substantial adverse change to the significance of tribal cultural resources would be reduced to less than significant.

Mitigation Measures: Refer to **Mitigation Measures CUL-1, CUL-2, and CUL-3** in *Section 3.5 Cultural Resources*.

3.19 Utilities and Service Systems

	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

Water Supply

Water supply services for the project area are provided by CVWD. CVWD delivers irrigation and potable water, collects and recycles wastewater, provides regional storm water protection, and replenishes the Coachella Valley Groundwater Basin and is the largest water supplier in the Coachella Valley. CVWD's pressurized pipeline domestic water distribution systems have 30 pressure zones and consist of approximately 96 groundwater production wells, 2,000 miles of pipeline, and 135 million gallons of storage in 61 enclosed reservoirs. In 2015, CVWD provided 92,974 AF of water to 212,871 residents through 107,358 active meters. CVWD's irrigation system consists of 485 miles of buried pipelines, 19 pumping plants, and 1,300 AF of storage and provides approximately 392,000 acre-feet per year (AFY) of Colorado River water and blended recycled water to over 1,100 customers covering approximately 76,354 acres. CVWD's water supplies come from groundwater, recycled water, imported water from the State Water Project (via the California Aqueduct) and the Colorado River via the Coachella Canal, a branch of the All-American Canal. All potable water is pumped from the groundwater basin. Imported and recycled water supplies are used to meet non-urban water demands and for groundwater replenishment.

Wastewater and Recycled Water

CVWD provides wastewater collection and treatment services in the project area. CVWD's wastewater collection system consists of approximately 1,100 miles of 6-inch through 36-inch diameter sewers and includes 35 sewage lift stations and associated force mains. The system contains trunk sewers, generally 10-inches in diameter and larger, that convey the collected wastewater flows to CVWD's treatment facilities. CVWD operates five water reclamation plants (WRPs), two of which (WRP-7 and WRP-10) generate recycled water for irrigation of golf courses and large landscaped areas. WRP-4 became operational in 1986 and serves communities from La Quinta to Mecca. WRP-4 effluent is not currently recycled; however, it will be recycled in the future after obtaining an approved wastewater change petition and tertiary treatment is constructed. The other two WRPs serve isolated communities near the Salton Sea. A sixth WRP (WRP-9) was decommissioned in July 2015.

Stormwater

CVWD provides regional flood protection for its stormwater unit within the Coachella Valley. CVWD's stormwater unit extends from the Whitewater River Spreading Area to Salton City, encompassing approximately 378,000 acres. CVWD's regional flood control system consists of a series of debris basins, levees, and stormwater channels that divert floodwaters from the canyons and alluvial fans surrounding the Coachella Valley to the 50-mile Whitewater River/Coachella Valley Stormwater Channel that flows to the Salton Sea.

Solid Waste

Waste collection in the project area is provided by Burrtec. The Mecca II landfill is located in Mecca, California approximately four miles to the east of the proposed project on Avenue 66.

Utilities

IID provides electricity services and Southern California Gas Company provides natural gas services within the project area.

a) Less than Significant Impact

The proposed project would construct approximately 27,000 linear feet of pipelines, a pressure reducing station, and associated onsite piping, meters, hydrants and valves to consolidate three privately owned SWSs into CVWD's municipal water system. The proposed project would not require or result in the construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities beyond the expansion of CVWD's potable water delivery system included in the proposed project. As discussed in *Section 3.15 Population and Housing*, the proposed project would serve existing communities and would not directly induce population growth that would require new or expanded utilities. Therefore, impacts would be less than significant, and no mitigation would be required.

b) Less than Significant Impact

The proposed project would construct water distribution pipelines to consolidate three privately owned SWSs into CVWD's municipal water system. CVWD has been extensively involved in water and sewer consolidation projects, primarily for small DACs and mobile home parks in the eastern Coachella Valley. Consolidation of small, public water systems, particularly in the eastern Coachella Valley, is a priority for CVWD and the region, as many of these systems are not reliable and have water quality issues. As plans to consolidate these small communities into the municipal water system have been ongoing, the increase in water demands from these consolidations are anticipated in future demand projections. Additionally, many of these communities are fairly small and would not substantially increase water demands compared to CVWD's total demands. According to CVWD's 2015 *Urban Water Management Plan*

(CVWD 2016), there will be sufficient supplies to meet projected demands through 2040 in normal, single-dry, and multiple-dry years.

Additionally, the proposed project would add a total of 122 service connections and an estimated population of 488 to CVWD's potable water system, as shown in **Table 2-2**. This is a relatively small addition given CVWD serves a total population of 216,900 through 107,358 municipal service connections (CVWD 2016). This represents a 0.23 percent population increase and 0.11 percent increase in service connections resulting from the proposed project. As shown in **Table 2-2**, the proposed project would result in a maximum day demand of 65.88 gpm. Thus, the proposed project would not create a substantial increase in population served or water demands. Therefore, CVWD has sufficient water supplies available to serve the proposed project and impacts would be less than significant.

c) No Impact

The proposed project would construct water pipelines to consolidate three privately owned SWSs into CVWD's potable water system and would not involve or increase wastewater collection or treatment services. Therefore, no impacts would occur, and no mitigation would be required.

d, e) Less than Significant Impact

Construction and implementation of the proposed project is not anticipated to generate a significant amount of solid waste. To the extent feasible, excavated soil would be reused on site. The construction contractor(s) would be required to dispose of excavated soil and solid wastes in accordance with local solid waste disposal requirements. Waste material would be hauled to the Mecca II landfill.

Solid waste generation would be limited to construction-related activities and would not affect available solid waste disposal capacity in the region. No long-term solid waste generation would be associated with the proposed project. Therefore, impacts would be less than significant, and no mitigation would be required.

Mitigation Measures: None required or recommended.

3.20 Wildfire

	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 downslopes 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

The Cal Fire Resources Assessment Program (FRAP; CalFire 2006) assesses the amount and extent of California's forests and rangelands, analyzes their conditions, and identifies alternative management and policy guidelines. Through the FRAP, Cal Fire produces maps designating very high fire hazard severity zones (VHFHSZ) within State and Local Responsibility Areas. The project is located within the Western Riverside County's LRA, which designates the project area as a non-VHFHSZ.

a) Less than Significant with Mitigation Incorporated

Construction of the proposed project would include installation of approximately 27,000 linear feet of pipelines, a pressure reducing station, and associated onsite piping, meters, hydrants and valves to connect three SWS's into CVWD's potable water system. Construction activities would take place within public rights-of-ways as well as on private and public land. Potential staging areas include vacant private and public land, parking lots, and segments of closed traffic lanes. Therefore, project construction would temporarily block access to some roadways and driveways that are currently used by emergency response vehicles or in emergency evacuations. **Mitigation Measure TRA-1** addresses how CVWD would communicate with emergency response agencies to develop emergency access strategies (see *Section 3.1.17 Transportation*). Long-term, the proposed project would not physically impair or otherwise interfere with emergency response or evacuation in the project vicinity as the majority of the project components would be located below-grade and ground surfaces would be returned to pre-construction conditions. Thus, impacts would be less than significant with mitigation.

b) Less than Significant Impact

The proposed project is located within an LRA designated as non-VHFHSZ. Therefore, the proposed project would not exacerbate wildfire risks, and thereby expose proposed project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant, and no mitigation would be required.

c) No Impact

The proposed project would construct approximately 27,000 linear feet of pipelines, a pressure reducing station, and associated onsite piping, meters, hydrants and valves to connect three SWS's into CVWD's potable water system. The proposed project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or result in temporary or ongoing impacts to the environment. O&M activities associated with the proposed project would minimally increase and may include reading and maintaining new water meters at the three communities, which would not require activities that would exacerbate fire risk. Therefore, no impacts would occur, and no mitigation would be required.

d) No Impact

The project area is primarily level low density residential and agricultural lands, and there are no slopes or hills within the project area. The majority of project components would be located below-grade, surfaces would be restored to pre-construction conditions, and implementation of the proposed project would not impact site drainage. Therefore, the proposed project would not expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes. No impacts would occur, and no mitigation would be required.

Mitigation Measures: Refer to **Mitigation Measure TRA-1** in *Section 3.17 Transportation*.

3.21 Mandatory Findings of Significance

	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporation</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

a) Less than Significant with Mitigation Incorporated

The proposed project would construct underground domestic water pipelines, a pressure reducing station, and associated onsite piping, meters, hydrants and valves to consolidate three SWSs with CVWD’s municipal water system. The majority of the proposed project would be located within roadway rights-of-way and previously developed or disturbed areas. With implementation of mitigation measures, the proposed project would not have the potential to substantially degrade the quality of the environment, reduce wildlife habitat, result in adverse impacts to wildlife populations or communities, or eliminate important examples of major periods of California history or prehistory.

As discussed in *Section 3.4 Biological Resources*, the proposed project site does not contain suitable habitat to support special status wildlife or plant species or sensitive plant or animal communities because of the disturbance history of the site, lack of suitable soils, inappropriate hydrologic conditions, or absence of appropriate vegetation communities. However, proposed project construction has the potential to impact nesting birds, which are protected under the MBTA and CFGC, as well as burrowing owl and two species of bats, which are identified as Species of Special Concern by CDFW. **Mitigation Measure BIO-1** would require a qualified biologist to conduct pre-construction surveys for roosting bats and appropriate mitigation to be implemented to reduce potential direct and indirect impacts on bat roosts. It also has potential to impact biological resources protected by the CVMSHCP. **Mitigation Measures BIO-1 and BIO-2** would require a qualified biologist to conduct pre-construction surveys for roosting bats and burrowing owls, respectively, and appropriate mitigation to be implemented to reduce potential direct and indirect impacts if roosting bats or burrowing

owls are discovered. **Mitigation Measure BIO-3** would require a qualified biologist to conduct surveys for nesting birds and appropriate mitigation to be implemented to reduce potential direct and indirect impacts if construction activities must occur within the nesting season. **Mitigation Measure BIO-4** would protect aquatic and riparian resources within the Whitewater River/Coachella Valley Stormwater Channel and the agricultural drains through implementation of a Frac-Out Prevention and Contingency Plan if HDD method is used for trenchless crossing. **Mitigation Measures BIO-5** would require CVWD to coordinate with CVAG or CVCC on specific surveys for species protected under the CVMSHCP in the Seferino Huerta MHP area and to conduct those surveys as required. With implementation of **Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4 and BIO-5**, impacts to biological resources would be less than significant.

Additionally, there is potential for ground-disturbing activities to uncover previously unrecorded cultural resources. **Mitigation Measures CUL-1** would require that a Native American monitor be present during all initial ground disturbing activities. **Mitigation Measure CUL-2** would require that all ground disturbing work be temporarily suspended if cultural resources are discovered during construction. **Mitigation Measure CUL-3** would be implemented to ensure proper procedure would be in place if human remains were unearthed during construction activities. With implementation of **Mitigation Measures CUL-1, CUL-2, and CUL-3**, potential impacts resulting in a substantial adverse change to the significance of Tribal, historical and/or archeological resources would be reduced to less-than-significant levels.

b) Less than Significant with Mitigation Incorporated

Implementation of the proposed project would not result in individually limited, but cumulatively considerable significant impacts. According to the CEQA Guidelines, 15065(a)(3), “cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probably future projects. As described in *Section 3.1* through *Section 3.20*, all resource topics associated with the proposed project have been analyzed in accordance with CEQA and the State CEQA Guidelines and were found to pose no impacts, less than significant impacts, or less than significant impacts with mitigation incorporated. No potentially significant impacts would occur from project implementation. Impacts related to air quality were evaluated against thresholds designed to gauge an individual project’s cumulative impacts and were determined to be less than significant. Potential impacts on special status and protected species, including bats and migratory birds, would be less than significant with mitigation. Likewise, the project’s potential impacts on unrecorded cultural resources and human remains would be less than significant with mitigation. Temporary impacts of construction related to handling hazardous materials, noise and vibration, and transportation circulation systems would also be less than significant with mitigation incorporated.

Related projects in the area consist primarily of other pipeline projects associated with the consolidation of the Saint Anthony MHP SWS and the Valley View MHP SWS as well as future MHP consolidation projects in the region, which includes those MHPs evaluated by CVWD as part of the MHP consolidation prioritization process for both domestic water and sewer services. The incremental impact of the proposed project, which is relatively small in scale, together with impacts of these other short and long-term related projects in the area would be considered less than significant due to the large geographical area of the projects and the extended timeframe for development of the projects (e.g. most projects would not occur simultaneously). Additionally, the related projects would be required to comply with the same or similar regulations and mitigation measures that would reduce potential impacts. Therefore, implementation of the proposed project along with current and future projects would not result cumulatively considerable significant impacts.

c) Less than Significant with Mitigation Incorporated

With implementation of mitigation measures, the proposed project would not have the potential to cause substantial adverse effects on human beings. The potential exists for accidents to occur during construction activities and routine

O&M, which would result in the release of hazardous materials into the environment. **Mitigation Measure HAZ-1**, which requires development of a Hazardous Materials Management Spill Control Plan, would reduce this potential impact to a less-than-significant level. The potential also exists for temporary construction activities to cause noise and groundborne vibration that would annoy nearby residents. **Mitigation Measure NOI-1**, which requires standard construction noise control measures, would reduce this potential impact to a less-than-significant level. Finally, construction-related vehicle trips and potential lane closures would result in temporary impacts to the surrounding transportation circulation system and emergency access. **Mitigation Measure TRA-1** would reduce these potential impacts to a less-than-significant level.

All resource topics associated with the proposed project have been analyzed in accordance with CEQA and the State CEQA Guidelines and were found to pose no impacts, less than significant impacts, or less than significant impacts with mitigation incorporated. Consequently, the proposed project would not result in any environmental effects that would cause substantial adverse effects on human beings directly or indirectly.

4. FEDERAL CROSS-CUTTING ENVIRONMENTAL REGULATIONS EVALUATION

The proposed project may receive funding under a State Water Resources Control Board program that also has a federal funding component and/or from a federal program. Therefore, to assist in compliance with the federal environmental requirements, for the funding programs, this document includes analysis pertinent to several federal cross-cutting regulations (also referred to as federal cross-cutters or CEQA-Plus). The basic rules for complying with cross-cutting federal authorities are set-out in the Drinking Water State Revolving Fund regulations at 40 CFR §35.3575 and the USDA Environmental Policies and Procedures at 7 CFR §1970.

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

4.1 Federal Endangered Species Act

Section 7 of the Federal Endangered Species Act (FESA) requires federal agencies, in consultation with the Secretary of the Interior, to ensure that their actions do not jeopardize the continued existence of endangered or threatened species or result in the destruction or adverse modification of the critical habitat of these species. Under Section 7, a project that could result in incidental take of a listed threatened or endangered species must consult with the USFWS to obtain a Biological Opinion (BO). If the BO finds that the project could jeopardize the existence of a listed species ("jeopardy opinion"), the agency cannot authorize the project until it is modified to obtain a "nonjeopardy" opinion.

For the purpose of the proposed project, the SWRCB and/or USDA would act as the federal lead or responsible agency. The information contained within the IS/MND and the Biological Resources Technical Study (Rincon 2019, Appendix B) may be used to support project compliance with FESA and MBTA.

Section 3.4 Biological Resources, describes that the project site does not contain suitable habitat for any special status plant or wildlife species. While 27 special status plant species have been previously documented within a five-mile radius of the project area by the CNDDDB and USFWS-IPaC, it was determined that the proposed project site does not contain suitable habitat to support special status plant species because of the disturbance history of the site, lack of suitable soils, inappropriate hydrologic conditions, or absence of appropriate vegetation communities. No special status plant species were observed within the project area during the field survey.

Special-status wildlife were evaluated for their potential to occur within the project area, including an additional buffer area, where direct or indirect impacts could occur. Although 26 special-status wildlife species were previously recorded within a five-mile radius of the project area, the project area was determined to not provide suitable habitat to support the 26 previously documented special status wildlife species, primarily due to the disturbed nature of and high human activity within the project area. No special status wildlife species were observed during the field survey. Therefore, the proposed project is not expected to result in direct or indirect impacts to this special-status plant or wildlife species and the proposed project would not jeopardize any listed species and the lead agency would be in compliance with FESA.

4.2 National Historic Preservation Act, Section 106

The purpose of the National Historic Preservation Act (NHPA) is to protect, preserve, rehabilitate, or restore significant historical, archaeological, and cultural resources. Section 106 requires federal agencies to take into account effects on historic properties. Section 106 review involves a step-by-step procedure described in detail in the implementing regulations (36 CFR Part 800).

As described in *Section 3.5 Cultural Resources*, a cultural resource assessment for the proposed project was conducted, and is provided in **Appendix C**. The analysis includes a Section 106 evaluation for the proposed project and can be submitted as part of the consultation process with the State Historic Preservation Officer (SHPO). Concurrence by SHPO would ensure compliance with the NHPA.

A total of 39 cultural resources have been previously recorded within a one-half-mile radius of the proposed project. Of these studies, fifteen include portions of the project area and overlap with approximately 50 percent of the project area. A total of 18 cultural resources have been previously recorded within a one-half-mile radius of the proposed project. These include nine historic period structures (Union Pacific Railway, Whitewater River/Coachella Valley Stormwater Channel, a utility line, and six road segments), one district (Martinez Historical District), four historic period archaeological sites (Mecca Railroad Station, the U.S. Experimental Date Station, Edna Cast Date Farm Complex, and a refuse scatter), one multi-component archaeological site (prehistoric and historic period artifact scatter), one prehistoric site (artifact scatter), and two prehistoric artifacts (isolated ceramic sherds). Two of the 18 known cultural resources, road segments on Avenue 66 (P-33-020844) and Lincoln Street (P-33-020839), intersect with the project area. The field survey identified no archaeological resources in the project area. **Mitigation Measure CUL-1** would require the initial ground-disturbing activities along be observed by an archaeological and Native American monitor. **Mitigation Measure CUL-2** would require that all earth disturbing work be temporarily suspended if cultural resources are discovered during construction until the discovery can be evaluated, and appropriate notification measures can be taken. **Mitigation Measure CUL-3** would be implemented to ensure proper procedures would be in place if human remains were unearthed during construction activities. With implementation of **Mitigation Measures CUL-1, CUL-2, and CUL-3**, impacts to historical resources under CEQA would be less than significant and no effects to historic properties under the NHPA for the proposed project are expected.

4.3 Clean Air Act

U.S. Congress adopted general conformity requirements as part of the Clean Air Act (CAA) Amendments in 1990 and the USEPA implemented those requirements in 1993 (Sec. 176 of the FCAA (42 United States Code [U.S.C.] § 7506) and 40 CFR Part 93, Subpart B). General conformity requires that all federal actions “conform” with the State Implementation Plan as approved or promulgated by USEPA. The purpose of the general conformity program is to ensure that actions taken by the federal government do not undermine State or local efforts to achieve and maintain the national ambient air quality standards. Before a federal action is taken, it must be evaluated for conformity with the State Implementation Plan. All “reasonably foreseeable” emissions predicted to result from the action are taken into consideration. These include direct and indirect emissions and must be identified as to location and quantity. If it is found that the action would create emissions above de minimis threshold levels specified in USEPA regulations (40 CFR § 93.153(b)), or if the activity is considered “regionally significant” because its emissions exceed 10% of an area’s total emissions, the action cannot proceed unless mitigation measures are specified that would bring the proposed project into conformance.

As described in *Section 3.3 Air Quality*, the project area lies within the SSAB. The results of the air quality modeling showed that pollutant emissions would not exceed federal General Conformity de minimis thresholds (**Appendix A**). Accordingly, the lead agency would be in compliance with the CAA.

4.4 Coastal Zone Management Act

The Coastal Zone Management Act (CZMA), passed by Congress in 1972 and managed by the National Oceanic and Atmospheric Administration’s Office of Ocean and Coastal Resource Management, is designed to balance completing land and water issues in coastal zones. It also aims to “preserve, protect, develop, and where possible, to restore or enhance the resources of the nation’s coastal zone.” Within California, the CZMA is administered by the Bay Conservation and Development Commission, the California Coastal Conservancy, and the California Coastal Commission.

No portion of the proposed project is within the coastal zone. The project area is located approximately 80 miles east of the Pacific Coast. Therefore, the CMZA does not apply to the proposed project.

4.5 Farmland Protection Policy Act

The Farmland Protection Policy Act (FPPA) requires a federal agency to consider the effects of its actions and programs on the nation's farmlands. The FPPA is intended to minimize the impact of federal programs with respect to the conversion of farmland to nonagricultural uses. It assures that, to the extent possible, federal programs are administered to be compatible with State, local, and private programs and policies to protect farmland.

As described in *Section 3.2 Agriculture and Forestry Resources*, the project area is located within the eastern Coachella Valley, which contains agricultural lands. The project area includes land designated as important farmland, including prime farmland and farmland of local importance. **Figure 3-1** and **Figure 3-2** show the designated important farmland and Williamson Act contracted lands within the project area, respectively. The proposed project would construct underground pipelines, a pressure reducing station, and associated onsite piping, meters, hydrants and valves to consolidate three SWSs into CVWD's municipal water system. The proposed project would be constructed within roadway rights-of-way, as well as on private or public land. The majority of the proposed project components would be located below-grade and ground surfaces would be restored to pre-construction conditions. The proposed project would not result in land use changes and would, therefore, not impact important farmland, conflict with agricultural zoning regulations, or result in other changes that would indirectly result in conversion of nearby farmland to non-agricultural use. Therefore, the proposed project would not adversely affect any farmland areas and the lead agency would be in compliance with the FPPA.

4.6 Executive Order 11988 – Floodplain Management

Executive Order (EO) 11988 requires federal agencies to recognize the values of floodplains and to consider the public benefits from restoring and preserving floodplains.

As described in *Section 3.9 Hydrology and Water Quality*, portions of the project area are in FEMA SFHA AE (100-year flood zone) and Zone X (500-year flood zone). The Manuela Garcia MHP and Seferino Huerto MHP are both located within the 100-year flood zone (Zone AE). The majority of Avenue 66 is in the 100-year flood zone (Zone AE), while a small portion between Lincoln Street and Highway 86 is designated as a 500-year flood zone (Zone X [shaded]). The proposed pressure reducing station is within the 100-year flood zone (Zone AE). Within the project area, the majority of Lincoln Street is not within a flood hazard zone; however, Lincoln Street is located within the 500-year flood zone (Zone X [shaded]) for about 1,300 feet south of 67th Avenue and in the 100-year flood zone (Zone AE) south of that. Saint Anthony MHP is not within a flood hazard zone (Zone X [unshaded]). Although portions of the proposed project would be located within 100-year and 500-year SFHAs, the proposed project would include installation of water underground distribution pipelines, a pressure reducing station, and associated onsite piping, meters, hydrants and valves that would not interfere with floodplain management or floodplain function or expose people or structures to a significant risk of loss, injury or death involving flooding. As such, the lead agency would be in compliance with this EO.

4.7 Federal Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, and Executive Order 13168

The MBTA and the Bald and Golden Eagle Protection Act prohibit the take of migratory birds (or any part, nest, or eggs of any such bird) and the take and commerce of eagles. EO 13168 (Sep 22, 2000) requires that any project with federal involvement address impacts of federal actions on migratory birds.

As described in *Section 3.4 Biological Resources*, the proposed project would have less than significant impact on nesting birds with implementation of **Mitigation Measure BIO-1** if construction cannot be avoided during nesting season. Thus, the lead agency would be in compliance with this EO.

4.8 Executive Order 11990 – Protection of Wetlands

Under EO 11990 (May 24, 1977), federal agencies must avoid affecting wetlands unless it is determined that no practicable alternative is available.

As described in *Section 3.4 Biological Resources*, the Whitewater River/Coachella Valley Stormwater Channel is considered a tributary of the Salton Sea. The Salton Sea is considered a Traditionally Navigable Water by USACE. Therefore, the Whitewater River/Coachella Valley Stormwater is considered a federally protected water of the US under Clean Water Act Section 404. However, the proposed project would utilize trenchless technologies in order to avoid direct impacts to the river channel. So long as the trenchless entry and exit pits are located outside of jurisdictional areas, there would be no impacts to wetlands and the lead agency would be in compliance with EO 11990.

4.9 Wild and Scenic Rivers Act

The Wild and Scenic Rivers Act was passed in 1968 to preserve and protect designated rivers for their natural, cultural, and recreational value.

There are no designated Wild and Scenic Rivers within the project area, nor will any designated rivers be adversely affected by the proposed project. As a result, the Wild and Scenic Rivers Act does not apply to the proposed project.

4.10 Safe Drinking Water Act – Source Water Protection

Section 1424(e) of the Safe Drinking Water Act established the USEPA's Sole Source Aquifer Program. This program protects communities from groundwater contamination from federally-funded projects.

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

4.11 Executive Order on Trails for America in the 21st Century

The EO on Trails for America (January 18, 2001) requires federal agencies to protect, connect, promote, and assist trails of all types throughout the United States. According to the trails map in the *Riverside County Eastern Coachella Valley Area Plan*, a Regional Trail exists along the Whitewater River/Coachella Valley Stormwater Channel along the western edge of the proposed project site (County of Riverside 2015). However, the proposed project would not impact the regional trail. As a result, no adverse effects on trails would occur and the lead agency is in compliance with this EO.

4.12 Executive Order 13007 – Indian Sacred Sites

Sacred sites are defined in Executive Order 13007 (May 24, 1996) as "any specific, discrete, narrowly delineated location on federal land that is identified by an Indian tribe, or Indian individual determined to be an appropriately authoritative representative of an Indian religion, as sacred by virtue of its established religious significance to, or ceremonial use by, an Indian religion; provided that the tribe or appropriately authoritative representative of an Indian religion has informed the agency of the existence of such a site."

As discussed in *Section 3.18 Tribal Cultural Resources*, results of the Sacred Lands File Search by the NAHC indicated the presence of Native American sacred lands within the vicinity of the project area and recommends that the Torres-Martinez Desert Cahuilla Indians be consulted. CVWD has contacted the Torres-Martinez tribe and per comments received, would contract a qualified Native American monitor to oversee all initial ground-disturbing activities as discussed in **Mitigation Measure CUL-1**. With implementation of **Mitigation Measure CUL-1**, potential impacts to any Indian sacred sites would be reduced to a less than significant level and the lead agency would be in compliance with this EO.

4.13 Magnuson-Stevens Fishery Conservation and Management Act

The Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) of 1976 as amended (16 U.S.C. § 1801 et seq.), is the primary act governing federal management of fisheries in federal waters, from the 3-nautical-mile state territorial sea limit to the outer limit of the U.S. Exclusive Economic Zone. It establishes exclusive U.S. management authority over all fishing within the Exclusive Economic Zone, all anadromous fish throughout their migratory range except when in a foreign nation's waters, and all fish on the continental shelf. The Act also requires federal agencies to consult with NMFS on actions that could damage Essential Fish Habitat (EFH), as defined in the 1996 Sustainable Fisheries Act (Public Law 104-297).

The proposed project would not be located in or impact any U.S. federal waters regulated under the Magnuson-Stevens Act. As described in *Section 3.4 Biological Resources*, the proposed project is not expected to have adverse effect on resident or migratory fish, or fish habitat in the proposed project area.

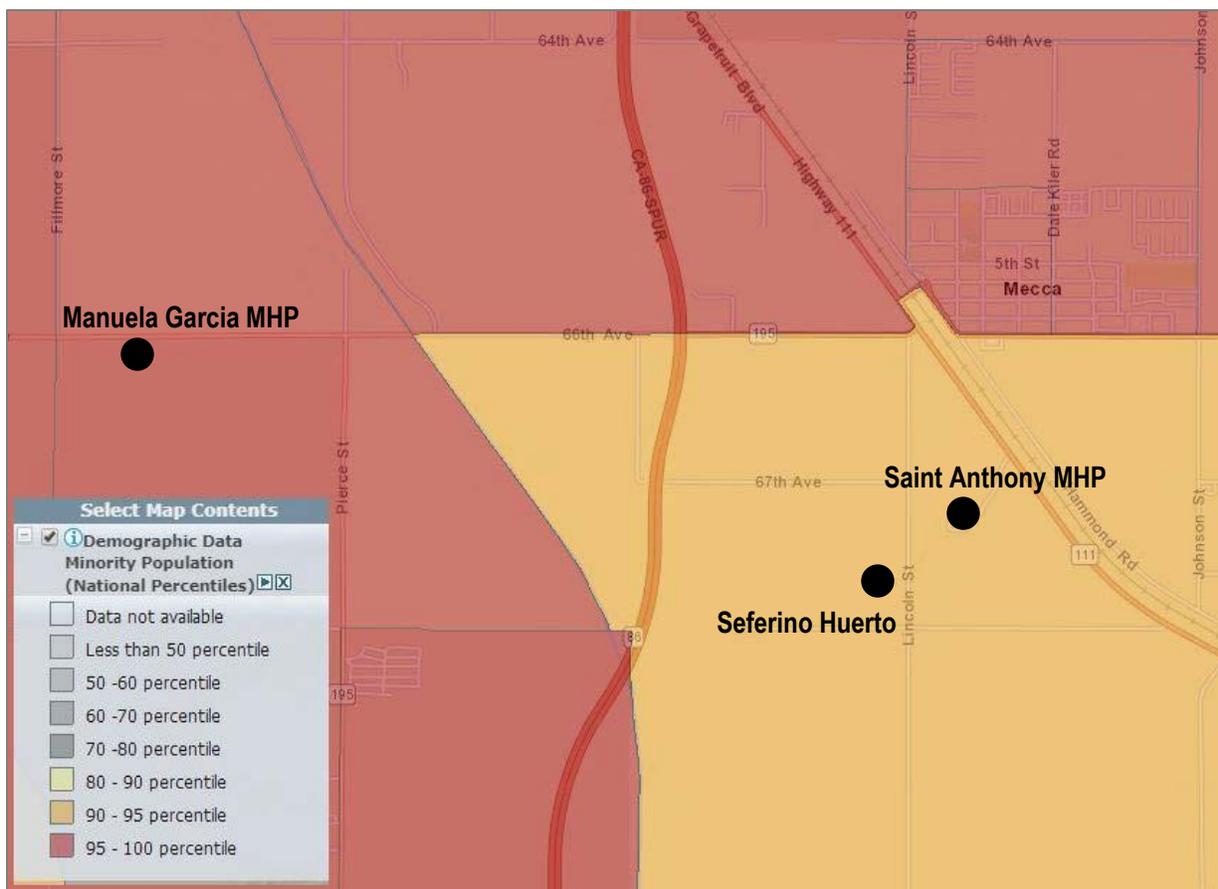
4.14 Environmental Justice

This section describes the existing socioeconomic resources in the proposed project area and the regulatory setting pertaining to environmental justice-related issues. This section also evaluates the potential for the proposed project to disproportionately affect minority or low-income groups. The USEPA defines environmental justice as:

“The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means no group of people, including racial, ethnic, or economic groups should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, State, local, and tribal programs and policies” (USEPA, 2016).

According to USEPA guidelines, a minority population is present in a study area if the minority population of the affected area exceeds 50 percent, or if the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis. The majority of the project alignment would be located in unincorporated Riverside County to the west of the unincorporated community of Mecca. According to the USEPA's Environmental Screening and Mapping Tool (EJScreen) (USEPA 2018), and as shown in **Figure 4-1**, the majority of the project area is within the 90-95 percentile and the western most portion of the Avenue 66 alignment and the Manuela Garcia MHP are within the 59-100 percentile for minority population. Therefore, the project area is composed of a minority population exceeding 50 percent.

Figure 4-1: USEPA EJScreen Map of Minority Population



USEPA guidelines recommend that analyses of low-income communities consider the U.S. Census Bureau’s poverty level definitions, as well as applicable State and regional definitions of low-income and poverty communities.

DWR defines a Disadvantaged Community (DAC) as a community with a median household income (MHI) less than 80 percent of the California MHI and a Severely Disadvantaged Community (SDAC) is a community with an MHI less than 60 percent of the California MHI. According to 2013 to 2017 ACS data, the statewide MHI was \$67,169. A DAC would therefore be a community with an MHI of \$53,735 or less and a SDAC would be a community with an MHI of \$40,301. According to the DWR DAC Mapping Tool (DWR 2019), the entire project area is a SDAC.

Impact Analysis

For the purposes of this analysis, an impact related to environmental justice would be significant if the proposed project would cause impacts to minority or low-income populations that are disproportionately high and adverse, either directly, indirectly, or cumulatively.

The proposed pipelines would construct pipelines to consolidate three SWs with CVWD’s municipal water system. Although the construction of the pipelines has the potential for short-term environmental effects as described in this document, (e.g. short term impacts on air quality, noise, hazards/hazardous materials, traffic), the consolidation of these SWs would have the long-term benefit of providing a reliable and safe potable water source for these communities.

Although construction would generate impacts (e.g., dust, traffic, and noise), such activities would be intermittent and temporary, and would cease upon completion of work activities. Where potential impacts would occur, mitigation measures have been identified to reduce such effects to less-than-significant levels. Therefore, with the consideration of the benefits provided to these communities through implementation of the proposed project and implementation of mitigation included in this document, the proposed project would not result in any disproportionately high adverse impacts on minority or low-income communities. Thus, no adverse environmental justice impacts would occur.

5. ALTERNATIVES ANALYSIS

5.1 Alternatives Evaluated

Two alternatives to the project are evaluated in this section: 1) The No Project/No Action Alternative; and 2) The Consolidate All Projects Alternative. Under the No Project/No Action Alternative the three SWSs within the Saint Anthony MHP Consolidation Project would not be consolidated onto the CVWD potable water system, and the SWSs serving the individual MHPs homes would continue to operate under current conditions. Water would continue to be supplied through private on-site wells, distributed with existing on-site pipeline network and treated through individual on-site systems. The No Project/No Action Alternative would not provide a safer more reliable water supply to existing communities.

The Consolidate All Projects Alternative is consolidation of the 39 SWS identified for the ECVWSP, prior to the System Prioritization Task, as discussed in *Section 2.1.1*. Under this alternative, 39 SWSs in the East Coachella Valley, including the Saint Anthony MHP project would be consolidated onto the CVWD potable water system. Each water consolidation project would require a combination of extensions and/or new potable water pipelines, laterals, on-site connections and on-site improvements to serve the 39 SWS.

Table 5-1 provides a comparison between the potential environmental impacts of the Saint Anthony Mobile Home Park Consolidation Project (the proposed Project) and the two alternatives. (No Project/No Action and Consolidate All Projects) with regard to the resource topics addressed in State CEQA Appendix G, Environmental Checklist, as well as the applicable federal cross-cutters. This alternatives analysis presents the environmental analysis behind choosing the proposed Project.

5.2 Selected Alternative

The No Project/No Action Alternative would not achieve the project objectives to improve the reliability, safety and security of the water supply for rural disadvantaged communities in the East Coachella Valley. The No Project/No Action Alternative is also not consistent with the *2017 Climate Change Scoping Plan*, which calls for improved coordination and management of various water supplies. Although the Consolidate All Projects Alternative would have impacts largely similar to the proposed project and would largely accomplish the same Project Objectives, as explained in the Project Report, it would be far more costly than the proposed project, and would therefore conflict with the second project objective identified in *Section 2.1.2 Purpose and Need*. The proposed project is the recommended alternative because it is cost-effective, serves the greatest demand, and achieves other project objectives for drinking water compliance reliability.

Table 5-1 presents a summary of the environmental impacts of the proposed Project, the proposed Project with mitigation incorporated (if applicable), the No Project/No Action Alternative, and the Consolidation of All Projects Alternative. **Table 5-1** summarizes the impacts as either No impact, Less than Significant Impact; Potentially Significant Impact; or Not Applicable (N/A).

Table 5-1: Comparison of Alternatives – Environmental Impacts

Issue Areas	Proposed Project		Alternatives	
	MND Findings	With Mitigation	No Project/ No Action	Consolidate All Projects
Aesthetics				
Scenic vistas; Visual character and quality; Light and glare	Less than Significant Impact	N/A	No impact	Less than Significant Impact
Scenic resources along a State Scenic Highway	No impact	N/A	No impact	No impact
<p>The proposed project involves the construction of underground pipelines and a below grade pressure reducing station, which would not be visible after the completion of construction. There are no scenic highways in the project area. Construction would occur primarily during daytime hours and any lighting necessary for construction would be directed towards installation activities and away from adjacent land uses. During construction, aesthetics would be temporarily impaired by construction equipment; however, once construction is complete, the proposed project would not be visible and would not result in permanent changes to scenic vistas, visual quality, or light and glare. The No Project/ No Action alternative would not involve construction of new structures that would impede views, change visual character, or add new substantial sources of light, and thus would not result in aesthetic impacts. The Consolidate All Projects Alternative would have a similar impact to the proposed project in that there would be temporary visual impacts during construction; however, once construction is complete the facilities would not be visible and would not result in permanent impacts.</p>				
Agriculture and Forestry				
Convert farmland; Conflict with zoning for agricultural use; Indirect conversion of farmland	Less than Significant Impact	N/A	No impact	Less than Significant impact
Loss of forest use; Conflict with zoning for forest use	No impact	N/A	No impact	No impact
<p>Pipelines would be constructed primarily within existing roadways and some public and privately owned properties with connections to existing small water systems including onsite improvements on privately owned properties, and would not result in conversion of farmland or loss of forest land. Similarly, the No Project/ No Action Alternative and the Consolidate All Projects Alternative would not impact agricultural or forest land.</p>				
Air Quality				
Consistency with AQMP; Non-attainment criteria pollutants	Less than Significant Impact	N/A	No impact	Less than Significant Impact
Consistency with air quality standards; Sensitive receptors	Less than Significant Impact	N/A	No impact	Potentially Significant / Less than Significant with Mitigation

Issue Areas	Proposed Project		Alternatives	
	MND Findings	With Mitigation	No Project/ No Action	Consolidate All Projects
Objectionable odors	Less than Significant Impact	N/A	No impact	Less than Significant Impact
<p>The proposed project involves connecting small water systems that serve existing communities to provide them with safer, more reliable supply of potable water. The project's pipeline alignments were described in CVWD's <i>Urban Water Management Plan</i> and would serve growth that was planned for in local growth forecasts, and thus would not conflict with the <i>Air Quality Management Plan</i> (AQMP). Assuming 150 linear feet of pipeline would be constructed each day, proposed project construction emissions would not exceed regional or localized significance thresholds, nor would they exceed de minimis thresholds, so federal general conformity requirements do not apply. The proposed project would not generate substantial operational emissions and emissions would not exceed the South Coast Air Quality Management District (SCAQMD) thresholds for any criteria pollutants. The proposed project would a minor increase in motor vehicle trips associated with maintenance; however, intermittent trips from a single vehicle would not generate emissions exceeding regional thresholds for operation. Construction-related odors from diesel equipment would be temporary and, once operational, the project would not create objectionable odors. The No Project/ No Action Alternative would not generate any construction emissions and would not result in any changes to operational emissions. If the improvements proposed under the Consolidate All Projects Alternative proceed at a rate similar to the proposed project, emissions would be less than significant. However, construction emissions would exceed air quality significance thresholds if the Consolidate All Projects Alternative were to result in simultaneous construction of multiple pipeline projects. Such impacts would be reduced to a less-than-significant level by requiring mitigation to phase construction so as to avoid exceeding construction emissions thresholds.</p>				
Biological Resources				
Sensitive species	Potentially Significant Impact	Less than Significant Impact	No impact	Potentially Significant / Less than Significant with Mitigation
Sensitive habitat; Wetlands; Wildlife corridors;	Potentially Significant Impact	Less than Significant Impact	No impact	Potentially Significant / Less than Significant with Mitigation
Local policies and ordinances	No Impact	N/A	No impact	No impact
Habitat Conservation Plans or Natural Community Conservation Plans	Less than Significant Impact	N/A	No impact	Less than Significant Impact

Issue Areas	Proposed Project		Alternatives	
	MND Findings	With Mitigation	No Project/ No Action	Consolidate All Projects
<p>The project area does not contain suitable habitat for special status species; however, it provides nesting bird habitat. Mitigation would reduce potential construction impacts on birds protected under the Migratory Bird Treaty Act to less than significant. The proposed project would cross the Whitewater River/Coachella Valley Stormwater Channel, an extension of the Whitewater River, and agricultural drains. The crossing would be constructed using trenchless technology (HDD or jack and bore). If HDD is selected for channel crossing, implementation of Mitigation Measure BIO-4 addressing frac-out risks would ensure that the channel and its aquatic and riparian habitats would not be affected by construction. Compliance with Mitigation Measure BIO-4 and the Frac-Out Prevention and Contingency Plan would ensure impacts on protected wetlands would be less than significant. The proposed project does not have the potential to impact sensitive vegetation communities or wildlife corridors because construction would occur in developed urban and agricultural areas. The proposed project is located within the planning area boundaries of the <i>Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP)</i> and the Seferino Huerta MHP is within the <i>Coachella Valley Stormwater Channel and Delta Conservation Area</i>. The project would implement the Land Use Adjacency Guidelines where applicable and Mitigation Measure BIO-5 to avoid effects to this conservation area. The No Project/No Action Alternative would involve no construction and therefore would not have the potential to result in impacts on biological resources. The Consolidate All Projects Alternative, similar to the proposed project, could significantly impact birds protected under the Migratory Bird Treaty Act, but mitigation would reduce impacts to less than significant. The Consolidate All Projects Alternative would also cross agricultural drains and the Whitewater River/Coachella Valley Stormwater Channel, requiring two crossings instead of one. However, the crossings would be constructed using trenchless technology and would implement a Frac-Out Prevention and Contingency Plan (if using HDD method) and a Storm Water Pollution Prevention Plan to minimize construction impacts to the channel. The Consolidate All Projects Alternative may include components within the <i>Delta Conservation Area</i> of the CVMSHCP and would comply with the CVMSHCP guidelines, resulting in less than significant impacts.</p>				
Cultural Resources				
Historical resources; Archaeological resources;	Potentially Significant Impact	Less than Significant Impact	No impact	Potentially Significant / Less than Significant with Mitigation
Human remains	Potentially Significant Impact	Less than Significant Impact	No impact	Potentially Significant / Less than Significant with Mitigation

Issue Areas	Proposed Project		Alternatives	
	MND Findings	With Mitigation	No Project/ No Action	Consolidate All Projects
<p>The records search identified two cultural resources within the project area, but both were determined to be ineligible for the National Register of Historic Places and California Register of Historical Resources. There is a possibility of identifying unanticipated cultural resources during ground disturbing activities associated with the proposed project. Implementation of mitigation measures including archaeological resource monitoring and practices for unanticipated discovery of cultural resources would reduce potential impacts to less than significant. The potential for encountering human remains is low; however, compliance the mitigation measure for the unanticipated discovery of human remains would ensure less than significant impacts. The No Project/No Action Alternative would not involve construction and therefore would not have the potential to disturb previously unknown cultural resources or human remains. Because of the larger construction area, construction of the Consolidate All Projects Alternative would have a greater potential than the proposed project to identify unanticipated cultural and historical resources, as well as unanticipated human remains. However, compliance with cultural resource mitigation measures would result in less than significant impacts.</p>				
Energy				
Wasteful, inefficient or unnecessary consumption of energy resources	Less than Significant Impact	N/A	No impact	Less than Significant Impact
Conflict with state or local plans for renewable energy or energy efficiency	Less than Significant Impact	N/A	No impact	Less than Significant Impact
<p>Construction of the proposed project would comply with required energy efficiency measures and operational energy use would offset energy currently used to pump and treat water at existing small water systems. Impacts associated with energy consumption would thus be less than significant. By consolidating existing water systems, the proposed project would support the <i>2017 Climate Change Scoping Plan</i> objective to reduce energy demand by improving coordination and management of water supplies. The proposed project would thus not conflict with state or local plans for energy efficiency and impacts would be less than significant. The No Project/No Action Alternative would not use energy for construction and operational energy use would remain the same as under existing conditions. The Consolidate All Projects Alternative is a larger project and would thus require more construction energy, but impacts would still be less than significant with implementation of required energy efficiency measures.</p>				
Geology and Soils				
Geological hazards; Erosion and topsoil loss; Unstable soils; Expansive soils	Less than Significant Impact	N/A	No impact	Less than Significant Impact
Alternative wastewater disposal systems	No impact	N/A	No impact	No impact
Paleontological Resources	Less than Significant Impact	N/A	No impact	Less than Significant Impact

Issue Areas	Proposed Project		Alternatives	
	MND Findings	With Mitigation	No Project/ No Action	Consolidate All Projects
<p>The proposed project involves construction of pipelines to consolidate water systems and thus would not involve exposure of people or structures to seismically induced risks. The project would minimize soil erosion via implementation of Best Management Practices in a SWPPP prepared in accordance with the SWRCB's Construction General Permit. Compliance with CVWD's professional engineering standards would ensure less than significant impacts related to risks of unstable soils or geologic hazards. The project is not located on expansive soils, nor would it involve the use of septic tanks or alternative wastewater disposal systems. The potential for encountering fossil resources is low because ground disturbing activities would only reach a depth of five to six feet below ground surface and pipelines would be constructed primarily within roadways and other public and private lands that are already disturbed; significant impacts to paleontological resources are thus not expected. The No Project/No Action Alternative would involve no construction and thus is not expected to result in impacts related to geologic hazards, septic systems or paleontological resources. Similar to the proposed project, the Consolidate All Projects Alternative would have less than significant impacts related to geologic hazards, erosion, topsoil loss, unstable soils, and expansive soils due to compliance with existing permits, Best Management Practices, and engineering standards and would not be expected to encounter paleontological resources.</p>				
Greenhouse Gas (GHG) Emissions				
GHG emissions	Less than Significant Impact	N/A	No Impact	Less than Significant Impact
Conflict with GHG reduction plans	Less than Significant Impact	N/A	Potentially Significant Impact	Less than Significant Impact
<p>The proposed project's maximum annual GHG emissions (including amortized construction emissions) would not exceed SCAQMD's recommended annual threshold for CO₂e emissions. GHG emissions of the proposed project would be less than significant, and the Project would support the <i>2017 Climate Change Scoping Plan</i>, which calls for improved coordination and management of various water supplies. The No Project/No Action Alternative would not involve construction and GHG impacts of operation would not change from the existing condition. However, the No Project/No Action Alternative would not support applicable GHG reduction plans because it would not improve coordination and management of water supplies. The Consolidate All Projects Alternative, similar to the proposed project, would result in annual GHG emissions that are less than the SCAQMD's annual threshold, as long as construction follows a similar schedule to the proposed project. The Consolidate All Projects Alternative would support applicable GHG reduction plans because it would support coordination of water supplies.</p>				
Hazards and Hazardous Materials				
Routine handling of hazardous materials; Listed hazardous materials sites; Airport safety hazard; Wildland fire	Less than Significant Impact	N/A	No impact	Less than Significant Impact
Accidental release of hazardous materials;	Potentially Significant Impact	Less than Significant Impact	No impact	Potentially Significant / Less than Significant with Mitigation

Issue Areas	Proposed Project		Alternatives	
	MND Findings	With Mitigation	No Project/ No Action	Consolidate All Projects
Emergency response or evacuation plans conflict	Potentially Significant Impact	Less than Significant Impact with mitigation	No impact	Potentially Significant / Less than Significant with mitigation
Hazardous materials near schools	No impact	N/A	No impact	No impact
<p>Construction of the proposed project would temporarily increase the routine transport and use of hazardous materials, but transport and use of hazardous materials would not be needed for pipeline operation. There are no active hazardous materials sites in the project area. The proposed pipelines are outside of the Jacqueline Cochran Regional Airport influence area as defined in the <i>Airport Land Use Plan</i> and would not cause an airport safety hazard. There are no private airstrips in the project area. The Project area is not a Very High Fire Hazard Severity Zone, and standard fire safety practices would be used during construction. These hazards are thus expected to be less than significant. There is a risk of accidental hazardous materials release during construction. Mitigation requiring a Hazardous Materials Management and Spill Control Plan would reduce impacts to less than significant. Temporary traffic lane closures during construction would impede emergency response; mitigation to require a Traffic Management Plan would reduce impacts to less than significant. There are no schools present near the proposed project alignment. The No Project/No Action alternative would involve no construction and would thus have no impacts associated with hazardous materials or other hazards. Similar to the proposed project, construction of the Consolidate All Projects Alternative would increase risks related to hazardous materials spills and would require a Hazardous Materials Management and Spill Control Plan as mitigation to have less than significant impacts. Construction would impede emergency access vehicles, which would require a Traffic Management Plan as mitigation. The Consolidate All Projects Alternative is not expected to result in significant impacts associated with use of hazardous materials during construction, airport/airstrip hazards or wildfires. There are no known active hazardous material cleanup sites in the Consolidate All Projects Alternative alignment area, according to SWRCB <i>GeoTracker</i>. There are no schools near the pipeline alignments for the Consolidate All Project Alternatives.</p>				
Hydrology and Water Quality				
Water quality standards or otherwise degrade water quality	Potentially Significant Impact	Less than Significant Impact	No impact	Potentially Significant / Less than Significant with Mitigation
Groundwater supply and recharge	Less than Significant Impact	N/A	No impact	Less than Significant Impact
Drainage alterations that cause erosion/sedimentation; flooding; exceed capacity of stormwater system; redirect or impede flood flows;	Less than Significant Impact	N/A	No impact	Less than Significant Impact
In flood hazard, tsunami, or seiche zones risk release of pollutants	Less than Significant Impact	N/A	No impact	Less than Significant Impact

Issue Areas	Proposed Project		Alternatives	
	MND Findings	With Mitigation	No Project/ No Action	Consolidate All Projects
Conflict with or obstruct water quality control plan or sustainable groundwater management plan	Less than Significant Impact	N/A	No impact	Less than Significant Impact
Excavation, grading, and other activities associated with construction of the proposed project would result in soil disturbance that would cause water quality violations through potential erosion and subsequent sedimentation of receiving water bodies, and potentially drilling fluid releases to agricultural drains and the Whitewater River/Coachella Valley Stormwater Channel if HDD method is used for pipeline crossing. However, compliance with the SWRCB Construction General Permit including implementation of BMPs outlined in a SWPPP, as well as implementation of Mitigation Measure BIO-4 , a Frac-Out Prevention and Contingency Plan (If HDD is used), would result in less than significant impacts. The proposed project would connect small water systems to the CVWD potable water system but would not alter the amount of groundwater use because both the small water systems and CVWD water system pump groundwater from the Coachella Valley Groundwater Basin. Disturbance of drainage patterns and runoff to the stormwater drainage system would be temporary and less than significant. The Project would not have an impact related to flooding risks, or seiche, tsunami, or mudflows. The No Project/No Action Alternative would not involve construction of new facilities so would not have construction or operational impacts on water quality or drainage patterns, and there would be no impact related to flooding risks, or seiche, tsunami, or mudflows. The Consolidate All Projects Alternative would comply with the permitting requirements of the Construction General Permit and thus would have a less than significant impact on water quality. The Consolidate All Projects Alternative would not impact groundwater supplies, similar to the proposed project. There would be no impact related to flooding risks, or seiche, tsunami, or mudflows.				
Land Use and Planning				
Divide an established community;	No impact	N/A	No impact	No impact
Conflict with an applicable land use plan	No impact	N/A	No impact	No impact
The project would not divide an established community and would not change land use, so it would not conflict with any applicable plan, policy or regulation with jurisdiction over the project. The No Project/No Action Alternative would not divide an established community and would not change land use; thus, no impact would occur. Once constructed, the Consolidate All Projects Alternative would not divide an established community and would comply with applicable land use plans.				
Mineral Resources				
Loss of availability of a known, valuable mineral resource or mineral resource recovery site	Less than Significant Impact	N/A	No impact	Less than Significant Impact
Impacts would be less than significant because there are no known mineral resources or mineral recovery sites in the vicinity of the project corridor. The same would be true for the Consolidate All Projects Alternative. Under the No Project/ No Action Alternative, no construction would occur thus no impacts would occur.				
Noise				

Issue Areas	Proposed Project		Alternatives	
	MND Findings	With Mitigation	No Project/ No Action	Consolidate All Projects
Excessive noise; Permanent increase in noise levels; Temporary increase in noise levels; Ground-borne vibration	Potentially Significant Impact	Less than Significant Impact	No impact	Potentially Significant / Less than Significant with Mitigation
Aircraft noise	Less than Significant Impact	N/A	No impact	Less than Significant Impact
<p>Construction noise from the proposed project would be temporary and exposure of any single receptor would be limited to a few days at most. Although construction noise associated with capital improvement projects of a governmental agency are exempt from the Riverside County noise ordinance, construction noise and vibration impacts on residents are considered potentially significant, so noise control measures would be employed to ensure that impacts are less than significant. The proposed project site is outside the noise impact area for the Jacqueline Cochran Regional Airport would thus not expose residents or workers to noise. Operation of the project would not generate perceptible noise. The No Project/No Action Alternative would not entail construction of new facilities and would thus have no temporary or permanent noise impacts. Similar to the proposed project, the impacts from temporary construction noise and vibration for the Consolidate All Projects Alternative would be less than significant with mitigation; there would be no operational noise impacts, and impacts associated with aircraft noise would be less than significant.</p>				
Population and Housing				
Population growth	Less than Significant Impact	N/A	No impact	Less than Significant Impact
Displacement of housing or people	No impact	N/A	No impact	No impact
<p>The proposed project would not directly induce population growth, as it would serve the existing communities that currently rely on the SWSs. Additionally, the proposed expansion of the CVWD potable system, and subsequent indirect growth, is consistent with planned growth in the area. Groundwater would continue to be supplied from the same groundwater basin. The project would not displace housing or people. Neither the No Project/No Action Alternative nor the Consolidate All Projects Alternative would displace housing or people. The No Project/No Action Alternative would not include new facilities and would not induce population growth. Similar to the project, the Consolidate All Projects Alternative would require the same level of groundwater production and would not directly induce population growth as it would serve the needs of the existing communities that currently rely on the SWSs. The CVWD infrastructure expansion would be planned in accordance with the existing Riverside County General Plan for the Eastern Coachella Valley region, and would not substantially induce unplanned growth. There are no impacts associated with either alternative.</p>				
Public Services / Recreation				
Fire protection services; Police protection services	No impact	N/A	No impact	No impact
Schools; Other services-libraries	No impact	N/A	No impact	No impact
Recreational facilities	No impact	N/A	No impact	No impact

Issue Areas	Proposed Project		Alternatives	
	MND Findings	With Mitigation	No Project/ No Action	Consolidate All Projects
<p>The project would not require additional or unusual fire or police protection resources or change existing demand for public services. It does not propose new recreational facilities that would impact the environment. There would be no impacts to public services or recreation associated with the proposed project. Similarly, there would also be no impacts from the No Project/No Action Alternative or the Consolidate All Projects Alternative.</p>				
Transportation				
Circulation system performance; Emergency access	Potentially Significant Impact	Less than Significant Impact	No impact	Potentially Significant / Less than Significant with mitigation
Consistency with CEQA Guidelines section 15064.3 subdivision (b) (VMT); Traffic hazards	No impact	N/A	No impact	No impact
<p>Construction would require lane closures for pipeline construction, and would generate only minimal vehicle trips for construction workers. To ensure that potential traffic impacts are less than significant, the proposed project would implement transportation mitigation measures, including notifying emergency service providers and schools, implementing a traffic control plan, and avoiding high volume intersections. The buried pipelines would not result in traffic hazards. The No Project/ No Action Alternative involves no construction and would not impact traffic circulation, emergency access, VMT, alternative transportation facilities, or create traffic hazards. The Consolidate All Projects Alternative would implement mitigation similar to that of the proposed project to minimize construction impacts on congestion, traffic, and emergency vehicle access. The Consolidate All Projects Alternative would not have a permanent impact involving VMT or traffic hazards.</p>				
Tribal Cultural Resources				
Tribal cultural resources	Potentially Significant Impact	Less than Significant Impact	No impact	Potentially Significant / Less than Significant with Mitigation
<p>CVWD consulted with several California Native American tribes pursuant to AB52. Although no tribal cultural resources have been identified in the project area, there is the potential for undiscovered resources to be encountered during construction. To reduce the potential impacts on tribal cultural resources, the project would implement mitigation measures including archaeological monitoring and best practices in the event of an unanticipated discovery of cultural resources and/or human remains during project construction. Implementation of cultural resources mitigation measures would reduce impacts to less than significant. The No Project/ No Action Alternative would not impact tribal cultural resources because it would not involve ground-disturbing activities. The Consolidate All Projects Alternative, similar to the proposed project, would implement cultural resources mitigation measures to reduce impacts to less than significant.</p>				
Utilities and Service Systems				
Construction of new utilities causing environmental effects	Less than Significant Impact	N/A	No impact	Less than Significant Impact

Issue Areas	Proposed Project		Alternatives	
	MND Findings	With Mitigation	No Project/ No Action	Consolidate All Projects
Sufficient water supply	Less than Significant Impact	N/A	No impact	Less than Significant Impact
Wastewater treatment capacity	No impact	N/A	No impact	No impact
Solid waste capacity; Solid waste compliance	Less than Significant Impact	N/A	No impact	Less than Significant Impact
<p>The proposed project includes new water lines but construction would not have significant environmental effects; no new wastewater, stormwater, power, or telecommunications facilities would be required. CVWD has determined that it has sufficient water supplies to serve the new service connections associated with the proposed project. The project would not require wastewater treatment capacity. Construction would generate a minimal amount of excess soils that would be reused onsite to the extent feasible; there would be no long-term solid waste generated by the proposed project so impacts would be less than significant. The No Project/ No Action Alternative would not include construction of any facilities and would have no additional demands for water, wastewater or solid waste facilities. The Consolidate All Projects Alternative would have similar impacts to the proposed project: it would not require additional wastewater treatment, stormwater or other facilities, and would have a less than significant impact related to solid waste. CVWD has sufficient water supplies to serve all of the small water systems that would be connected under the Consolidate All Projects Alternative.</p>				
Wildfire				
Impair an adopted emergency response or evacuation plan	Potentially Significant	Less than Significant	No Impact	Potentially Significant / Less than Significant with Mitigation
Exacerbate wildfire risk due to slope, prevailing winds, or other factors	Less than Significant	N/A	No Impact	Less than Significant Impact
Exacerbate wildfire risk due to required installation or maintenance of associated infrastructure	No Impact	N/A	No Impact	Less than Significant
Expose people or structures to risks resulting from runoff, post-fire slope instability, or drainage changes	No Impact	N/A	No Impact	Less than Significant

Issue Areas	Proposed Project		Alternatives	
	MND Findings	With Mitigation	No Project/ No Action	Consolidate All Projects
<p>The project area is not a Very High Fire Hazard Severity Zone, and standard fire safety practices would be used during construction. Thus, no impacts are expected related to exacerbation of wildfire risk. Temporary traffic lane closures during construction would impede emergency response; mitigation to require a Traffic Management Plan would reduce impacts to less than significant. The No Project/No Action alternative would involve no construction and would thus have no impacts associated with exacerbation of wildfire risk and would not impact emergency response or evacuation plans. Similar to the proposed project, the Consolidate All Projects Alternative construction would impede emergency access vehicles, which would require a Traffic Management Plan as mitigation. The Consolidate All Projects Alternative is not expected to result in significant impacts associated with exacerbation of wildfires.</p>				
Federal Cross-Cutters				
Federal Endangered Species Act	Comply	Comply	No Impact	Comply
<p>The proposed project site does not contain suitable habitat for any special status plant or wildlife species. All trenching would occur within paved or previously disturbed areas; therefore, the proposed project is not expected to result in direct or indirect impacts on special-status plant species. Mitigation would minimize potential impacts on protected nesting birds. The proposed project would not jeopardize listed species and the SWRCB and/or USDA would be in compliance with the Federal Endangered Species Act (ESA). The No Project/ No Action Alternative would involve no construction and thus would not impact sensitive species. The Consolidate All Projects Alternative, similar to the proposed project, would involve trenching within paved or previously disturbed areas and would not impact undisturbed habitat. With mitigation to protect nesting birds, the Consolidate All Projects Alternative would not jeopardize listed species.</p>				
National Historic Preservation Act, Section 106	Comply	Comply	No impact	Comply
<p>The cultural resources assessment conducted for the proposed project would be submitted as part of the consultation process with the State Historic Preservation Officer (SHPO). Concurrence by SHPO would ensure compliance with the National Historic Preservation Act (NHPA). No cultural resources were identified within the project area and the proposed project would implement mitigation measures in the event of unanticipated discovery of cultural resources. The No Project/ No Action Alternative would not affect undisturbed soils or historical resources. Similar to the proposed project, the Consolidate All Projects Alternative would conduct a cultural resources assessment, implement mitigation measures, and consult with SHPO to comply with the NHPA.</p>				
Clean Air Act	Comply	N/A	No impact	Comply
<p>The results of the air quality modeling showed that pollutant emissions would not exceed federal General Conformity <i>de minimis</i> thresholds and impacts were less than significant; the SWRCB and/or USDA would be in compliance with the Federal Clean Air Act (CAA). The No Project/ No Action Alternative would result in no changes to existing emission and air quality. For the Consolidate All Projects Alternative, impacts to air quality from construction emissions would be similar to that of the proposed project, so long as construction proceeded at a similar rate. Both Alternatives are expected to comply with the CAA.</p>				
Coastal Zone Management Act	N/A	N/A	N/A	N/A
<p>No portion of the proposed project area, the No Project/ No Action Alternative Area, nor the Consolidate All Projects Alternative area are within the coastal zone. Therefore, the Coastal Zone Management Act does not apply.</p>				
Farmland Protection Policy Act (FPAA)	Comply	N/A	No impact	Comply

Issue Areas	Proposed Project		Alternatives	
	MND Findings	With Mitigation	No Project/ No Action	Consolidate All Projects
Neither the proposed project, No Project/ No Action Alternative, nor the Consolidate All Projects Alternative are located in areas currently under agricultural production, nor do they contain farmland. The proposed project and Alternatives would not conflict with State, local, and private programs and policies to protect farmland and the SWRCB and/or USDA would be in compliance with the FPAA.				
Executive Order 11988 – Floodplain Management	Comply	N/A	No impact	Comply
The proposed project pipelines would be located underground and would not interfere with floodplain management or expose people or structures to a significant flooding risk. As such, the SWRCB and/or USDA would be in compliance with Executive Order 11988. Likewise, the No Project/ No Action Alternative and the Consolidate All Projects Alternative would not expose people or structures to significant flood-related risk.				
Federal Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, and Executive Order 13168	Comply	Comply	No impact	Comply
The proposed project would have less than significant impact on protected birds with implementation of mitigation if construction cannot be avoided during the nesting season. The No Project/ No Action Alternative would involve no construction and would not be expected to affect protected birds. The Consolidate All Projects Alternative, with the incorporation of mitigation to protect nesting birds, would have a less than significant impact.				
Executive Order 11990 – Protection of Wetlands	Comply	N/A	No impact	Comply
The proposed project does not involve construction within federally protected wetlands as defined by Clean Water Act (CWA) Section 404. The proposed project would utilize trenchless crossing of the Whitewater River/Coachella Valley Stormwater Channel in order to avoid direct impacts to wetlands and mitigation would ensure protection of aquatic and riparian habitats in the case of frac-out during HDD. The SWRCB and/or USDA would be in compliance. Similarly, the Consolidate All Projects Alternative would involve trenchless crossings of the Whitewater River/Coachella Valley Stormwater Channel. The No Project/No Action Alternative would not involve construction and would not impact federally protected wetlands.				
Wild and Scenic Rivers Act	N/A	N/A	N/A	N/A
There are no designated Wild and Scenic Rivers within the Project area. Neither the proposed project, the No Project/ No Action Alternative Area, or the Consolidate All Projects Alternative would result in an impact.				
Safe Drinking Water Act – Source Water Protection	N/A	N/A	N/A	N/A
There are no sole-source aquifers in the project area. Neither the proposed project, the No Project/ No Action Alternative area, or the Consolidate All Projects Alternative would result in an impact.				
Executive Order on Trails for America in the 21st Century	N/A	N/A	N/A	N/A



Issue Areas	Proposed Project		Alternatives	
	MND Findings	With Mitigation	No Project/ No Action	Consolidate All Projects
There are no trails in the project area. Neither the proposed project, the No Project/ No Action Alternative area, or the Consolidate All Projects Alternative would result in an impact.				
Executive Order 13007 – Indian Sacred Sites	N/A	N/A	N/A	N/A
Neither the proposed project, No Project/ No Action Alternative, nor Consolidate All Projects Alternative would be located on or impact any federal land that is identified as an Indian sacred site.				
Magnuson-Stevens Fishery Conservation and Management Act	N/A	N/A	N/A	N/A
The proposed project is not located in, nor would it impact any U.S. federal waters regulated under the Magnuson-Stevens Act. The proposed project is not expected to have an adverse effect on Essential Fish Habitat, migratory fish, wildlife species, or fish habitat in a protected area. Similarly, the No Project/ No Action Alternative and Consolidate All Projects Alternative would not affect Essential Fish Habitat or waters regulated under the Magnuson-Stevens Act.				
Environmental Justice	Comply	N/A	Comply	Comply
The proposed project alignment would be located in the community of Thermal, which has a 98.8 percent minority population and is considered to be low income or disadvantaged. The proposed project would have short-term construction impacts but would achieve the long-term goal of supply a safer, more reliable water supply to this disadvantaged community. The No Project/ No Action Alternative would have no impacts but would result in no benefits to the community. The Consolidate All Projects Alternative would also be located within the community of Thermal. Therefore, similar to the proposed project, the Consolidate All Projects Alternative would have short-term impacts, but would result in long-term benefits to a disadvantaged community.				

6. COMMENTS AND RESPONSES

The public comment period on the Draft IS/MND was open for a period of 30 days from July 25, 2019 through August 23, 2019. During that time, CVWD received no written comments from local, state, or federal agencies, or interested organizations and individuals regarding the adequacy or accuracy of the environmental analysis in the IS/MND.

CVWD received the following telephone calls and written letters during the public comment period:

On Monday July 29, 2019, CVWD environmental staff received a call from Ross Mullen, who indicated he is a landowner on the north side of Avenue 66 between Pierce Street and Buchanan Street. Mr. Mullen expressed interest in having his property connected to the proposed Avenue 66 water main. Mr. Mullen was referred to CVWD Development Services Division for potential, future water service.

On August 23, 2019, CVWD environmental staff received a written comment from Hector Zaragoza expressing concern that the Zaragoza Mobile Home Park and others along Avenue 66 are not included in the project scope, and expressed interest in connecting to CVWD's water and sewer system (See comment letter on the following pages). He also expressed interest in submitting a public comment at a CVWD Board of Directors meeting. Mr. Zaragoza was referred to CVWD Development Services Division for potential, future water service, and was informed that a publicly-noticed Board of Directors meeting on the project was being planned for September 2019.

On August 23, 2019, CVWD environmental staff received a letter from Lucy Padilla, Archaeologist for the Tribal Historic Preservation Office (THPO) of the Agua Caliente Band of Cahuilla Indians (ACBCI) (see comment letter on following pages). Ms. Padilla stated that the project is not located within the boundaries of the ACBCI Reservation, but is within the Tribe's Traditional Use Area, and that the concerns of the ACBCI THPO have been addressed and proper mitigation measures are proposed to protect tribal cultural resources. CVWD acknowledges this comment, and notes that the letter documents conclusion of AB 52 consultation.

On August 26, 2019 CVWD environmental staff received a letter from the State Clearinghouse of the Governor's Office of Planning and Research acknowledging that no state agencies had submitted comments on the IS/MND by the end of the comment period, and that CVWD met all State Clearinghouse review requirements for draft environmental documents, pursuant to CEQA. The State Clearinghouse letter is provided on the following pages.

No revisions or additions have been made to the IS/MND in response to these comments.

August 23, 2019

Elizabeth Meyerhoff
Environmental Specialist
Coachella Valley Water District
75515 Hovley Lane East
Palm Desert, CA. 92211

RE: Saint Anthony Mobile Home Park Water Consolidation Project

Dear Ms. Meyerhoff,

I am writing in response to the Notice of Intent to Adopt a Mitigated Negative Declaration and the Saint Anthony Mobile Home Park Water Consolidation Project. More specifically, I write on behalf of my parents, Ramón and Hermelinda Zaragoza, who own a Polanco Park at **87-842 Ave 66 Thermal, CA. 92274**. It is great to see that consolidation projects are being planned for the Eastern Coachella Valley, but in reviewing the notice and the project documents, it seems that the Zaragoza Mobile Home Park and others along Ave 66 are not included in the project scope.

My parents have been working closely with Riverside County to permit the park and are nearly complete. It would be a great benefit to us and to the residents of the park to be consolidated to both water and sewer projects that CVWD has planned for the near future, and included in the scope of work for the Saint Anthony's Consolidation Project.

We'd be happy to provide more information if necessary and are open to further discussion on our request. Please confirm the date in which the Board of Directors will discuss this topic at a public meeting as we would like to submit public comment. Please feel free to contact me at zaragoza09@gmail.com or (760) 333-9662.

Sincerely,

Hector Zaragoza
Ramón Zaragoza
Hermelinda T. Zaragoza



August 23, 2019

[VIA EMAIL TO:emeyerhoff@cvwd.org]
Coachella Valley Water District
Ms. Elizabeth Meyerhoff
75-515 Hovley Lane East
Palm Desert, CA 92211

Re: Draft Initial Study and Mitigated Negative Declaration: Saint Anthony Mobile Home Park Water Consolidation Project

Dear Ms. Elizabeth Meyerhoff,

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to include the Tribal Historic Preservation Office (THPO) in the Project 1305 (APN 749-090-031) project. The project area is not located within the boundaries of the ACBCI Reservation. However, it is within the Tribe's Traditional Use Area. For this reason, the ACBCI THPO requests the following:

*At this time the concerns of the ACBCI THPO have been addressed and proper mitigation measures have been proposed to ensure the protection of tribal cultural resources. This letter shall conclude our AB52 consultation efforts.

Again, the Agua Caliente appreciates your interest in our cultural heritage. If you have questions or require additional information, please call me at (760)699-6956. You may also email me at ACBCI-THPO@aguacaliente.net.

Cordially,

Lacy Padilla
Archaeologist
Tribal Historic Preservation Office
AGUA CALIENTE BAND
OF CAHUILLA INDIANS



Gavin Newsom
Governor

AUG 29 2019 10:30

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

August 26, 2019

Elizabeth Meyerhoff
Coachella Valley Water District
75515 Hovley Lane East District
Palm Desert, CA 92211

Subject: Saint Anthony Mobile Home Park Water Consolidation Project
SCH#: 2019079089

Dear Elizabeth Meyerhoff:

The State Clearinghouse submitted the above named MND to selected state agencies for review. The review period closed on 8/23/2019, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act, please visit: <https://ceqanet.opr.ca.gov/2019079089/2> for full details about your project.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

7. REPORT PREPARATION

7.1 Report Authors

This report was prepared by the Coachella Valley Water District, Woodard & Curran, and Rincon Consultants, Inc. Staff from the agency and companies that were involved include:

Coachella Valley Water District

- Elizabeth Meyerhoff, Environmental Specialist
- William Patterson, Environmental Supervisor
- Steve Bigley, Director of Environmental Services
- Dan Ruiz, Engineering Manager

Woodard & Curran

- Rosalyn Prickett, AICP, Principal
- Jennifer Ziv, Project Manager
- Haley Johnson, CEQA Analyst
- Alexis Cahalin, CEQA Analyst

Rincon Consultants, Inc.

- Tiffany Clark, PhD, RPA, Senior Archaeologist
- Lindsay Porras, MA, RPA, Archaeologist
- Megan Minter, Senior Biologist
- Steven J. Hongala, Senior Ecologist
- Jon Montgomery, GIS Analyst

7.2 References

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