



Addendum No. 1 to Mitigated Negative Declaration

Valley View Mobile Home Park Water Consolidation Project

State Clearinghouse # 2019079095

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APPENDICIES

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Acronyms

Acronym	Definition
APE	Area of Potential Effects
BMPs	best management practices
CalEEMod	California Emissions Estimator Model
CEQA	California Environmental Quality Act
CVAG	Coachella Valley Association of Governments
CVMSHCP	Coachella Valley Multiple Species Habitat Conservation Plan and Natural Community Conservation Plan
CVWD	Coachella Valley Water District
CWSRF	Clean Water State Revolving Fund
DAC	disadvantaged community
EIR	environmental impact report
FEMA	Federal Emergency Management Agency
LST	local significance threshold
MHI	median household income
MHP	Mobile Home Park
MND	Mitigated Negative Declaration
NPDES	National Pollutant Discharge Elimination System
SCAQMD	South Coast Air Quality Management District
SCH	State Clearinghouse
SWRCB	State Water Resources Control Board
SWPPP	Stormwater Pollution Prevention Plan
SWS	small water system
USDA	United States Department of Agriculture
US EPA	United States Environmental Protection Agency

1. INTRODUCTION

This document is an Addendum to the Valley View Mobile Home Park (MHP) Water Consolidation Project Mitigated Negative Declaration and Subsequent Mitigated Negative Declaration (State Clearinghouse [SCH] No. 2019079095; collectively referred to hereafter as the “MND”). The Addendum to the MND has been prepared pursuant to the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq.

1.1 Project Background

On September 24, 2019, the Coachella Valley Water District (CVWD) Board of Directors approved the Valley View MHP MND, which evaluated the environmental impacts associated with connecting nine small water systems (SWSs) to CVWD’s potable water system through the installation of potable water pipelines to address public health concerns. In May 2021, CVWD identified the need to include an additional pipeline connection to convey potable waters. On April 12, 2022, the CVWD Board of Directors approved the Subsequent MND, which evaluated the environmental impacts associated with construction of a new potable water pipeline that would connect the existing CVWD water main crossing the Coachella Valley Stormwater Channel on Palm Street to the Airport Boulevard pipeline evaluated in the MND. In August 2022, through the engineering design process for the Valley View MHP Water Consolidation Project, CVWD determined the need to revise the De Leon Ranch pipeline alignment from what was evaluated in the MND. An Addendum to the MND has been identified as the appropriate CEQA document to address the revised pipeline alignment (see Section 1.3, below).

1.1.1 Original Approved Project

The MND and Subsequent MND analyzed the environmental impacts of construction and operation of approximately 18,000 linear feet of new water mains, 1,100 linear feet of water laterals, 2,300 linear feet of fire service lines, and 1,500 linear feet of onsite service lines at nine SWS to add 143 connections to CVWD’s existing potable water system. The water alignment would be placed within the public right-of-way along Avenue 66, Fillmore Street, Desert Cactus Drive and Avenue 55 (see **Figure 1-1**).

1.1.2 Proposed Modified Project

In August 2022, CVWD identified the need to move the location of a previously planned potable water pipeline alignment for De Leon Ranch in order to lower construction costs and minimize easement constraints. The original pipeline alignment evaluated in the MND was approximately 4,600 linear feet and was located within Fillmore Street and Avenue 55. For the Modified Project, this pipeline would instead be located within an existing dirt road between Soto Water SWS and De Leon Ranch SWS and would only require construction of approximately 1,400 linear feet of pipeline, a reduction of approximately 3,200 linear feet. The term Modified Project only applies to the 1,400 linear foot pipeline evaluated in this Addendum.

The Modified Project would include the construction of approximately 1,400 linear feet of new 12-inch potable water main to consolidate De Leon Ranch to CVWD's existing potable water system. The new 12-inch potable water main would be constructed parallel to, within the same roadway as, the sewer main that will service De Leon Ranch. De Leon Ranch (Assessor's Parcel Number: 763-370-026) has 13 existing service connections that would be converted to CVWD's potable water system, as analyzed under the Valley View MHP Water Consolidation Project MND and Subsequent MND (SCH No. 2019079095). **Figure 1-2** shows the approved project and the proposed modifications to the original approved project (Modified Project).

1.2 Purpose of Addendum

This Addendum to the MND addresses potential environmental effects of the construction and operation of the Modified Project as shown in **Figure 1-2** (and discussed in greater detail in Section 2). The MND and this Addendum, together with the other documents incorporated by reference herein, serve as the environmental review of the Modified Project, as required pursuant to the provisions of CEQA, the CEQA Guidelines, 14 California Code of Regulations Section 15000 et seq. The environmental analysis in this Addendum and all feasible mitigation measures identified in the MND would be incorporated into the resolutions approving the Modified Project.

Figure 1-1: Original Approved Project Evaluated in MND and Subsequent MND

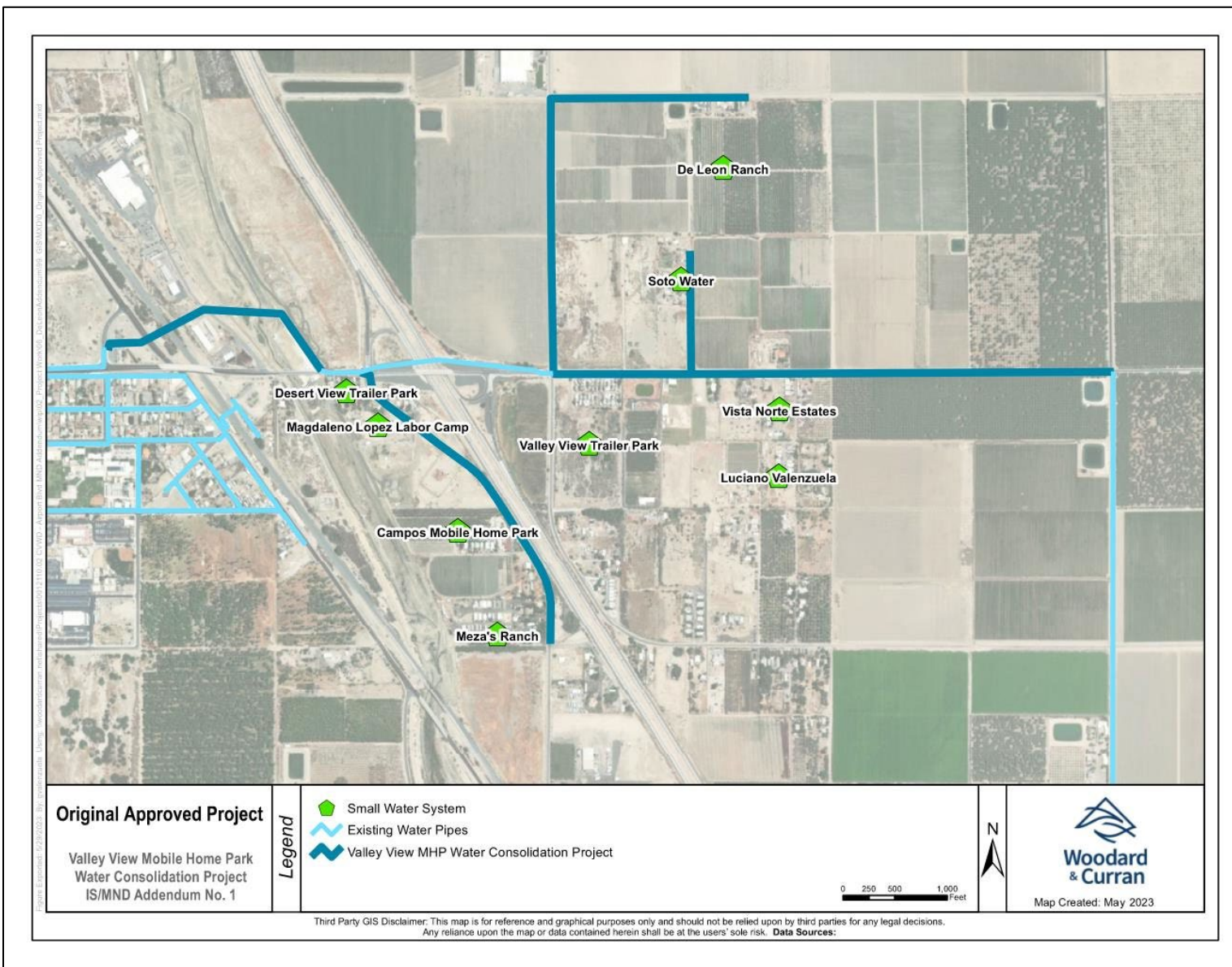
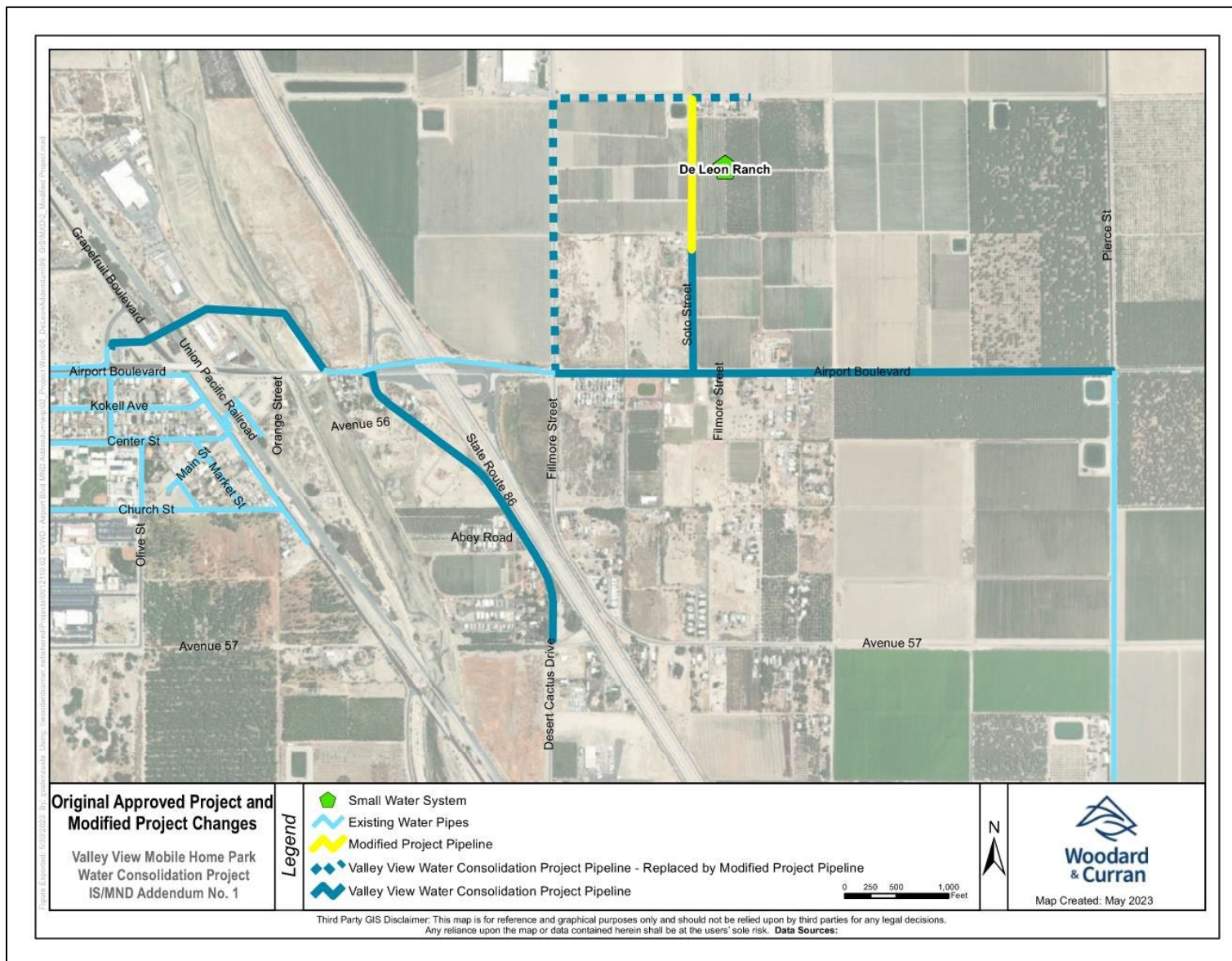


Figure 1-2: Modified Project and Valley View MHP Water Consolidation Project



1.3 Basis for Addendum

Section 15164 of the CEQA Guidelines states: “The lead agency or responsible agency shall prepare an addendum to a previously certified environmental impact report (EIR) if some changes or additions are necessary but none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR have occurred.” Pursuant to Section 15162 of the CEQA Guidelines, no subsequent EIR may be required for the project unless the lead agency determines, on the basis of substantial evidence, that one or more of the following conditions are met:

- A. When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
 - (1) Substantial changes are proposed in the project which would require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
 - (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which would require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
 - (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - (a) The project would have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (b) Significant effects previously examined would be substantially more severe than shown in the previous EIR;
 - (c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - (d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

- B. If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision a). Otherwise, the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.
- C. Once a project has been approved, the lead agency's role in project approval is completed, unless further discretionary approval on that project is required. Information appearing after an approval does not require reopening of that approval. If after the project is approved, any of the conditions described in subdivision a) occurs, a subsequent EIR or negative declaration shall only be prepared by the public agency which grants the next discretionary approval for the project, if any. In this situation no other responsible agency shall grant an approval for the project until the subsequent EIR has been certified or a subsequent negative declaration adopted.

CVWD has assessed the proposed project modifications in light of the requirements defined under Section 15162 of the CEQA Guidelines. As discussed in this Addendum, none of the conditions requiring preparation of a subsequent negative declaration under Section 15162 of the CEQA Guidelines have been identified.

1.4 Evaluation of Environmental Impacts

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

- Aesthetics;
- Agriculture Resources;
- Air Quality;
- Biological Resources;
- Cultural Resources;
- Geology and Soils;
- Greenhouse Gas Emissions;
- Energy;
- Hazards and Hazardous Materials;
- Hydrology and Water Quality;
- Land Use and Planning;
- Mineral Resources;
- Noise;
- Population and Housing;
- Public Services;

- Recreation;
- Transportation and Traffic;
- Tribal Cultural Resources;
- Utilities and Service Systems; and
- Wildfire Risk.

The Modified Project would involve a change in the location of a previously planned potable water pipeline serving De Leon Ranch. The change in location would result in a reduction of approximately 3,200 linear feet of pipeline constructed. The new location would be in a similar setting, within an existing road. The methods of construction (i.e., pavement cutting, grading, trenching, and restoration) are the same as, or very similar to, those evaluated in the MND. Based on the similarities in construction methods and location of the Original Approved Project and the Modified Project and based on the reduction in overall size of the pipeline serving De Leon Ranch, the environmental analysis provided in the MND remains current and applicable to the Modified Project. The conclusions and mitigation measures in the MND are applicable to the Modified Project. As explained below, the Modified Project is not associated with new significant impacts or greater severity of impacts compared to the Original Approved Project.

The following resource areas were found to have No Impact or Less than Significant Impact in the MND, and the Modified Project would also result in a finding of No Impact or Less than Significant Impact. No additional analysis is required for the following unchanged environmental resources evaluated in the MND. For a discussion and analysis of the resources topics below please refer to the previous MND and Subsequent MND, these resource areas are not analyzed further in this Addendum:

- 3.1 Aesthetics
 - a) adverse effect on scenic vista;*
 - b) damage scenic resources within the viewshed of a State scenic highway;*
 - c) degrade existing visual character or quality of public views.*
- 3.2 Agriculture and Forestry Resources
 - c) conflict with existing zoning for, or cause rezoning of forest land or timberland;*
 - d) loss of or conversion of forest land;*
 - e) result in conversion of farmland or forest land.*
- 3.3 Air Quality
 - d) result in other emissions, such as odors, that may affect a substantial number of people;*
- 3.4 Biological Resources
 - f) conflict with local, regional, or state habitat conservation plan*
- 3.6 Energy
- 3.7 Geology and Soils
- 3.8 Greenhouse Gas Emissions
- 3.9 Hazards and Hazardous Materials

- a) *routine transport, use, or disposal of hazardous materials;*
- c) *hazardous emissions, materials, substances, or waste within one-quarter mile of a school*
- e) *within two miles of a public airport or public use airport result in a safety hazard or excessive noise*
- g) *expose people or structures to a significant risk of loss, injury or death involving wildland fires*
- 3.10 Hydrology and Water Quality
 - b) *substantially decrease groundwater supplies or interfere substantially with groundwater recharge*
 - c) *substantially alter the existing drainage pattern of the site or area*
- 3.11 Land Use and Planning
 - a) *physically divide an established community*
- 3.12 Mineral Resources
- 3.13 Noise
 - c) *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*
- 3.14 Population and Housing
- 3.15 Public Services
- 3.16 Recreation
- 3.17 Transportation
 - b) *conflict with CEQA Guidelines Section 15064.3, subdivision (b)*
 - c) *substantially increase hazards due to a geometric design feature or incompatible uses*
- 3.19 Utilities and Service Systems
- 3.20 Wildfire
 - b) *exacerbate wildfire risk*
 - c) *require infrastructure that may exacerbate fire risk*
 - d) *expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes*

This Addendum evaluates environmental resources where the proposed Modified Project changes could result in changes to impacts and environmental resources that were potentially significantly impacted by the Original Approved Project and required mitigation as disclosed in the MND. Because of the Modified Project's similarity to the Original Approved Project in construction methods, and because the Modified Project would result in a reduction of approximately 3,200 linear feet of pipeline constructed, there is the potential for the Modified Project to have similar or lesser impacts as the Original Approved Project.

In addition, this document includes analysis to support compliance with federal environmental review requirements should CVWD pursue federal funding programs. The federal cross-cutting topics evaluated include:

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

Impact Terminology

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

Reduced Impact. The impacts of the Modified Project would be less than those of the original Approved Project.

No New Impact/No Impact. The Modified Project would result in no or no new impact compared to the original Approved Project.

New Mitigation Required. The Modified Project would result in a new or substantially greater impact compared to the original Approved Project and new mitigation would be required to reduce the impact to a less than significant level.

New Potentially Significant Impact. The Modified Project would result in a new impact or substantially greater impact compared to the Original Approved Project. A subsequent MND would be required.

1.5 Summary of Findings

The environmental evaluation in this Addendum has concluded that major revisions of the MND due to new significant environmental effects or a substantial increase in the severity of previously identified significant effects are not required. There are no substantial changes proposed in the Modified Project; no substantial changes in the circumstances under which the Modified Project would be undertaken; and no new information of substantial importance which was unknown or could not have been known at the time the MND was certified. The impacts of the Modified Project are consistent with the impacts of the Original Approved Project in the MND. There are no new significant impacts resulting from implementation of the Modified Project, nor are there any substantial increases in the severity of any previously identified environmental impacts, and no new mitigation measures would be required. The environmental analysis in this Addendum and all applicable mitigation measures identified in the MND would be incorporated into the resolutions approving the Modified Project.

2. PROJECT DESCRIPTION

2.1 Purpose of Project

The Modified Project is part of the Valley View MHP Water Consolidation Project in the East Coachella Valley area that is necessary to address potable water public health concerns in local disadvantaged communities (DACs). The water consolidation project would create water reliability, redundancy, and functionality for potable water for the identified SWSs to ensure adequate public health throughout the area. The CVWD potable water system is operated and maintained by full-time State of California certified operational staff.

The objectives of the Modified Project are the same as the original Valley View MHP Water Consolidation Project and are twofold:

1. To improve the reliability, safety, and security of the water supply for rural DACs within the CVWD service area 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 within the CVWD service area.

2.2 Existing Conditions

The SWSs that would be consolidated into the CVWD potable water system are currently operated by the system owners. The local groundwater supplies 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). Based on Riverside County Department of Environmental Health (DEH) inspection reports, De Leon Ranch MHP shows maximum contaminant level exceedances for arsenic and/or fluoride at their respective groundwater supply wells. A Culligan Reverse Osmosis (RO) unit was installed in 2008 to address these constituents. In addition to the RO treatment system, a DEH approved liquid chlorination system was installed in August 2011 in response to multiple violations for total coliform in the water system.

2.3 Environmental Setting

The Modified Project is located in the eastern portion of the greater Coachella Valley within Riverside County, California near the community of Thermal, in the vicinity of the intersection of State Route 86 and Airport Boulevard. The project area is south of Avenue 55, west of Pierce Street, north of Avenue 58, and east of State Route 86.

The eastern portion of the Coachella Valley is located at the northern end of the Salton Sea, California's largest lake. 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 and agricultural production.

The community of Thermal is located west of State Route 111, south of the City of Coachella, and contains light industrial uses as well as residential and commercial uses. The Riverside County-owned Jacqueline Cochran Regional Airport is located in the western part of Thermal. Historically, Thermal has been an important agricultural center, and remains so, with its more prominent crops including dates, table grapes, grapefruit, and assorted vegetables. In the core area of the community, to the north of Thermal Town Center, are two schools – John Kelley Elementary School and La Familia Continuation High School, a Riverside County Sheriff's station, and Riverside County Thermal Fire Station 39. State Route 111 and State Route 86 are the main north-south connector routes within the eastern Coachella Valley. The Southern Pacific Railroad runs adjacent to State Route 111 and the Salton Sea, to Riverside County's southern boundary.

The Coachella Valley Multiple Species Habitat Conservation Plan and Natural Community Conservation Plan (CVMSHCP) is a comprehensive multiple species habitat conservation planning program that addresses multiple species needs, including habitat and the preservation of natural communities in the Coachella Valley area of Riverside County. The Modified Project is not located within or adjacent to a conservation area associated with the CVMSHCP. The CVMSHCP was adopted by the plan participants in 2007 and 2008, and permits were issued by the wildlife agencies in late 2008.

Future projects within the vicinity of the Modified Project include the following:

- The Airport Boulevard Sewer Consolidation Project consists of consolidation of 13 privately owned small water systems, currently reliant on private septic systems. The project would connect to CVWD's sanitary sewer system and convey an average of approximately 64,000 gallons per day. The project would construct approximately 17,700 linear feet of new sewer mains, a lift station, sewer laterals, and approximately 12,150 linear feet of onsite service lines.
- The Leon Housing MHP water consolidation project would construct approximately 7,400 linear feet of 12-inch potable water mains within Fillmore Street and Avenue 57, 80 linear feet of laterals, and various onsite service lines, to add 38 connections within four SWSs to CVWD's existing potable water system: Duran's Farms, Leon Housing, Oscar Cruz Water System, and Villa de Josue MHP. In addition, water and sewer service may be extended to a fifth SWS on Avenue 57. The project is currently in the planning and design stage.
- The Coachella Valley Association of Government's (CVAG) CV Link project would provide access for pedestrians, bicyclists, and golf carts on a dedicated off-road path parallel to Highway 111. A segment of the multi-modal path would be constructed between Avenue 54 and Airport Boulevard along the west bank of the Coachella Valley Stormwater Channel. This segment is currently under construction.

- Riverside County's Airport Boulevard Bridge Replacement Project would widen Airport Boulevard overpass crossing of the Coachella Valley Stormwater Channel. This project currently has an undetermined construction start date.
- The Coachella Airport Business Park Project would develop parcels designated Industrial District between the Coachella Valley Stormwater Channel and Highway 86, immediately north of Airport Boulevard. The project, a mixed-use business park development which includes warehouse space, commercial cannabis-related uses, small businesses, self- and vehicle-storage, a drive thru restaurant and service station/mini mart-related land uses, and an electric substation, has been approved by the City of Coachella (SCH# 2023040106) and is currently planned to be constructed in phases through 2025.
- The City of Coachella plans to construct a potable water pipeline north of Airport Boulevard, east of Highway 111, and west of Highway 86, in adjacent easements within the vicinity of the Phase III A-2 Transmission Main, in order to extend the City's potable water service capabilities easterly. No timeline for construction or planning is available as of the writing of this document.

2.4 Description of Modified Project

The Modified Project consists of a change in the location of a planned potable water pipeline which would serve one independent SWS (De Leon Ranch), as shown in **Figure 1-2**. The previously planned pipeline alignment was approximately 4,600 linear feet and was located within Fillmore Street and Avenue 55. The Modified Project would be located within a dirt road north of Soto Street between Soto Water SWS and De Leon Ranch SWS. The Modified Project would only require approximately 1,400 linear feet of pipeline, a reduction of approximately 3,200 linear feet.

The Modified Project would construct approximately 1,400 linear feet of new 12-inch diameter ductile iron pipe potable water main that would connect to the planned 12-inch diameter pipeline in Soto Street. This is the same alignment as the proposed sewer pipeline to De Leon Ranch analyzed in CVWD's Airport Boulevard Sewer Consolidation Project MND (SCH No. 2021090585). The Modified Project does not include changes to any of the lateral connections within the De Leon SWS.

2.4.1 Construction Methods – Open Cut

As with the Original Approved Project described in the MND, the water pipeline of the Modified Project would be installed within existing County of Riverside roadway rights of way and the SWS property. Typical pipeline construction processes are described below:

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

- **Surface Preparation** – Surface preparation involves removing structures (such as fences or posts), pavement, and/or vegetation from the trenching. 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. The construction contractor is responsible for determining how much soil would be used onsite as backfill, how much clean fill soil would be imported to the construction site, and where the soil hauled offsite would be ultimately disposed. In general, pipe trenches would be three to five feet wide and five to six feet deep.

The Modified Project’s maximum area of disturbance during the construction period would encompass approximately 28,000 square feet (0.6 acre), assuming a 10-foot buffer on either side of the pipeline trenching alignment for staging areas

The pipeline trench would be open for two to three days on average. During construction, vertical wall trenches would be temporarily “closed” at the end of each workday, by covering with steel plates or backfilled. The trench 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 compactability and stability.

All construction activities would occur within the County of Riverside roadway rights-of-way and the De Leon SWS property. Disturbance activities would occur on existing dirt access roads and in vegetated areas adjacent to the access roads.

- **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.

2.4.2 Construction Equipment and Staging

The construction equipment required for the Modified Project would be the same as that listed in the MND for open cut pipeline installation and is listed in **Table 2-1**.

Table 2-1: Construction Equipment

Equipment	Number Required for Pipeline
Cement and Mortar Mixer	1
Excavator	1
Forklift	1
Paver	1
Paving Equipment	1
Rollers	2
Tractors/Loaders/Backhoes	6
Trencher	1

2.4.3 Construction Trip Generation

During construction, the Modified Project would generate trips associated with construction crews and material deliveries. Construction of the 1,400 linear foot 12-inch pipeline would proceed at a rate of approximately 100 linear feet per day. Construction would generate up to 20 round-trip trips per day, including one round trip for off hauling of export material, and one round trip for delivery of materials. Construction would involve approximately 1,600 cubic yards of material export, assuming as much native fill is reused for backfill of the trench as possible. Exported material would be deposited at the nearest landfill that can accommodate the type of soil waste generated, as determined by the construction contractor.

2.4.4 Construction Schedule

Construction of the Modified Project is anticipated to last one month.

Project construction activity is anticipated to occur continuously, between the hours of 7:00 a.m. and 6:00 p.m., Monday through Friday only and excluding federal holidays, which is compliant with the County of Riverside Ordinance Regulating Noise.

2.4.5 Construction Best Management Practices

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

- **Drainage / Erosion Control** - During the 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 2014) would be implemented as applicable to the Modified Project site's stormwater drainage features. In addition, the project contractor would be required to obtain a Construction General Permit pursuant to the National Pollutant Discharge Elimination System (NPDES), which would require development of a construction Stormwater Pollution Prevention Plan (SWPPP) and implementation of BMPs to prevent polluted runoff from leaving the construction site.

- **Groundwater Dewatering** - The Modified Project 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 Modified Project may necessitate an individual traffic lane closure along Soto Street and/or Avenue 55. 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. Refer to **Mitigation Measure 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 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.

2.4.6 Operation and Maintenance

CVWD would continue to operate its domestic water system with no operational modifications. The proposed pipeline of the Modified Project would not be associated with long-term energy usage or additional CVWD operation and maintenance activities.

2.5 Permits and Approvals

The permits and approvals listed in **Table 2-2** may be required prior to project construction.

Table 2-2: Permits and Approvals

Agency	Permit/Approval
Local	
County of Riverside	<ul style="list-style-type: none"> • Encroachment, Road, and Construction Permits • Mobile Home Park Permit • Well demolition permit
South Coast Air Quality Management District	<ul style="list-style-type: none"> • Fugitive Dust Control Plan
State	
State Water Resources Control Board	<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

Regional Water Quality Control Board, Colorado River Region	<ul style="list-style-type: none">• General Permit for Construction Discharges (dewatering/ test water)
Federal	
United States Environmental Protection Agency / State Water Resources Control Board	<ul style="list-style-type: none">• Funding under the Drinking Water State Revolving Fund

3. EVALUATION OF ENVIRONMENTAL IMPACTS

The following includes the environmental checklist review pursuant to CEQA. The analysis herein evaluates the adequacy of the environmental impact findings and mitigation in the Original Approved Project, the Valley View MHP Water Consolidation Project, relative to impacts and mitigation of the Modified Project. The Valley View MHP Water Consolidation Project MND was approved by the CVWD Board of Directors on September 24, 2019. The Valley View MHP Water Consolidation Project Subsequent MND was approved by the CVWD Board of Directors on April 12, 2022.

Agriculture and Forestry Resources

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

(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

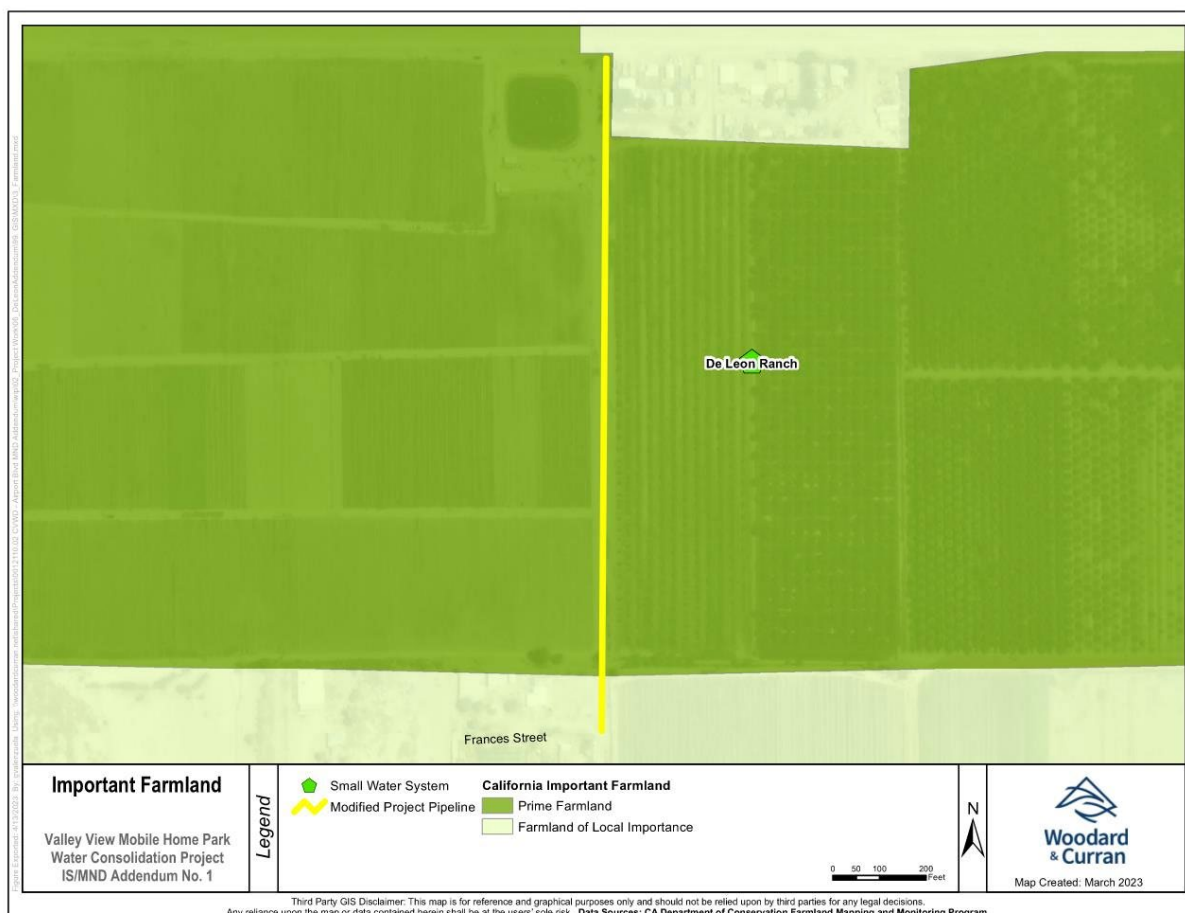
Original Approved Project

The MND found that the Original Approved Project would not interfere with existing agricultural operations. Although a majority of the area surrounding the Original Approved Project is mapped as important farmland, the pipelines would be constructed within existing 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 project components would be located below-grade and ground surfaces would be restored to pre-construction conditions. The Original Approved Project would not result in land use changes and would, therefore, not convert important farmland to a nonagricultural use or result in other changes that would indirectly result in conversion of nearby farmland to non-agricultural use. Therefore, the impacts would be less than significant.

Modified Project

Similar to the Original Approved Project, although agricultural land adjacent to the Modified Project is classified as important farmland (**Figure 3-1**), the Modified Project would be installed within an existing dirt road between Soto Water SWS and De Leon Ranch SWS and disturbed surfaces would be restored to pre-construction conditions. The Modified Project would not convert farmland to non-agricultural use or result in land use changes that would result in the conversion of farmland to non-agricultural use. Therefore, there would be no new impact as a result of the Modified Project and no new mitigation would be required.

Figure 3-1: Important Farmland



(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract

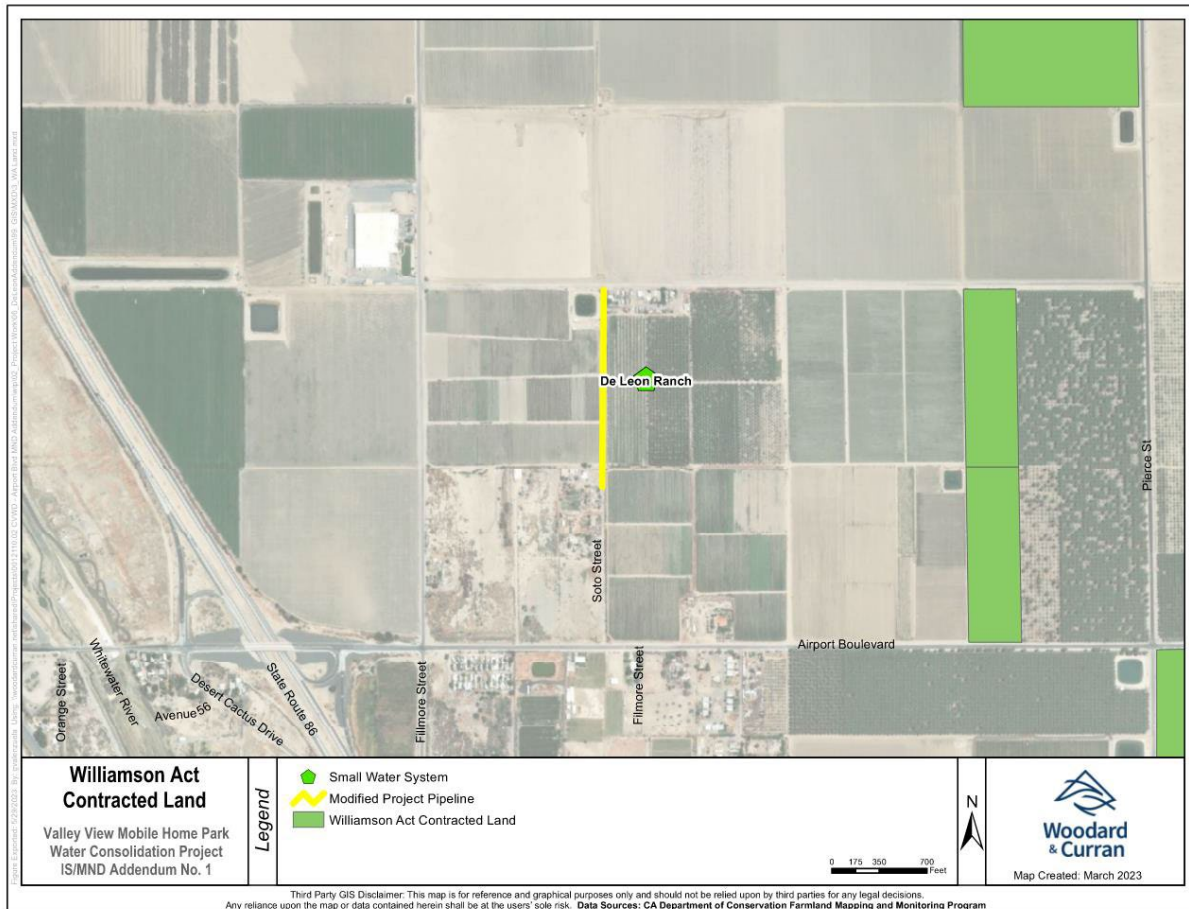
Original Approved Project

The MND found that the Original Approved Project would not directly impact Williamson Act contracted lands because pipelines would be constructed within the existing right of way and the land use and zoning of those lands would not be altered. Therefore, the impacts would be less than significant.

Modified Project

Similar to the Original Approved Project, no portion of the Modified Project is located on or adjacent to a Williamson Act contracted land and the land use and zoning of those lands would not be altered (**Figure 3-2**). Therefore, there would be no new impact as a result of the Modified Project and no new mitigation would be required.

Figure 3-2: Williamson Act Contracted Land



Mitigation Measures

None required.

Air Quality

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

under Air Quality. The resource areas under checklist questions (a), (b) and (c) are analyzed.

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

Original Approved Project

The applicable air quality plan for the Original Approved Project is the SCAQMD Air Quality Management Plan (AQMP), which assesses the attainment status of the Coachella Valley portion of the Salton Sea Air Basin (SSAB) and provides a strategy for attainment of State and federal air quality standards. The AQMP strategies are developed based on population, housing, and employment growth forecasts anticipated under local city general plans and regional transportation plans.

The MND found that the Original Approved Project would not lead to unplanned population, housing, or employment growth that exceeded the forecasts used in the development of the SCAQMD AQMP, and thus impacts would be less than significant.

Modified Project

Similar to the Original Approved Project, the Modified Project would consolidate the De Leon Ranch SWS into CVWD's existing potable water system and would have no effect on unplanned population, housing, or employment growth. Therefore, there would be no new impact as a result of the Modified Project and no new mitigation would be required.

(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

Original Approved Project

The MND conducted air emissions modeling using the California Emissions Estimator Model (CalEEMod) version 2016.3.2 to estimate the Original Approved Project's criteria air pollutant emissions. Model emissions scenarios were based on project-specific information and CalEEMod default values in instances where project-specific information was not available (e.g., construction equipment horsepower, length of worker trips, soil moisture content). The MND found that neither construction nor operational emissions would exceed SCAQMD regional thresholds or local significance thresholds (LSTs) for maximum daily emissions. Therefore, the Original Approved Project would not result in a cumulatively considerable net increase of a criteria pollutant for which the SSAB is non-attainment.

Modified Project

Construction

As described within *Section 2.4 Description of Modified Project*, the equipment and construction methods used for construction of the Modified Project will be the same as those analyzed for the Original Approved Project. However, the previously planned

pipeline alignment serving De Leon Ranch in the Original Approved Project required approximately 4,600 linear feet while the Modified Project alignment requires only approximately 1,400 linear feet, a reduction of approximately 3,200 linear feet of pipeline. Emissions estimated for the Original Approved Project are higher than emissions would be for the Modified Project because construction equipment and methods are the same but the Modified Project would require less equipment use, worker vehicle trips, and material hauling. As a result, the cumulative pollutant emissions from the Modified Project would not exceed SCAQMD regional thresholds or localized significance thresholds (LSTs). No new construction impacts would occur, and no new mitigation would be required.

Operation

The Modified Project would not be associated with long-term energy usage or additional operation and maintenance activities. Inspection and maintenance of the pipeline would be incorporated into CVWD's existing operation and maintenance activities. Thus, no new emissions would be associated with operation of the Modified Project and no new mitigation would be required.

(c) Expose sensitive receptors to substantial pollutant concentrations

Original Approved Project

As discussed in the MND, construction and operational emissions would not exceed the SCAQMD regional thresholds or LSTs, which are set at levels that protect public health. Although sensitive receptors would be exposed to air pollutant emissions while adjacent pipelines are being actively installed, construction emissions would be temporary and would not be located in the same location for the entire construction period. In addition, the Original Approved Project would not have the potential to cause a carbon monoxide hotspot on roadways adjacent to sensitive receptors. Therefore, impacts to sensitive receptors would be less than significant.

Modified Project

The Modified Project would be located within an existing dirt road between the Soto Water SWS and De Leon Ranch SWS, which were previously analyzed in the MND. There are no new sensitive receptors within the Modified Project area which could be impacted by construction or operation of the Modified Project. No new impact would occur under the Modified Project and no new mitigation would be required.

Mitigation Measures

None required.

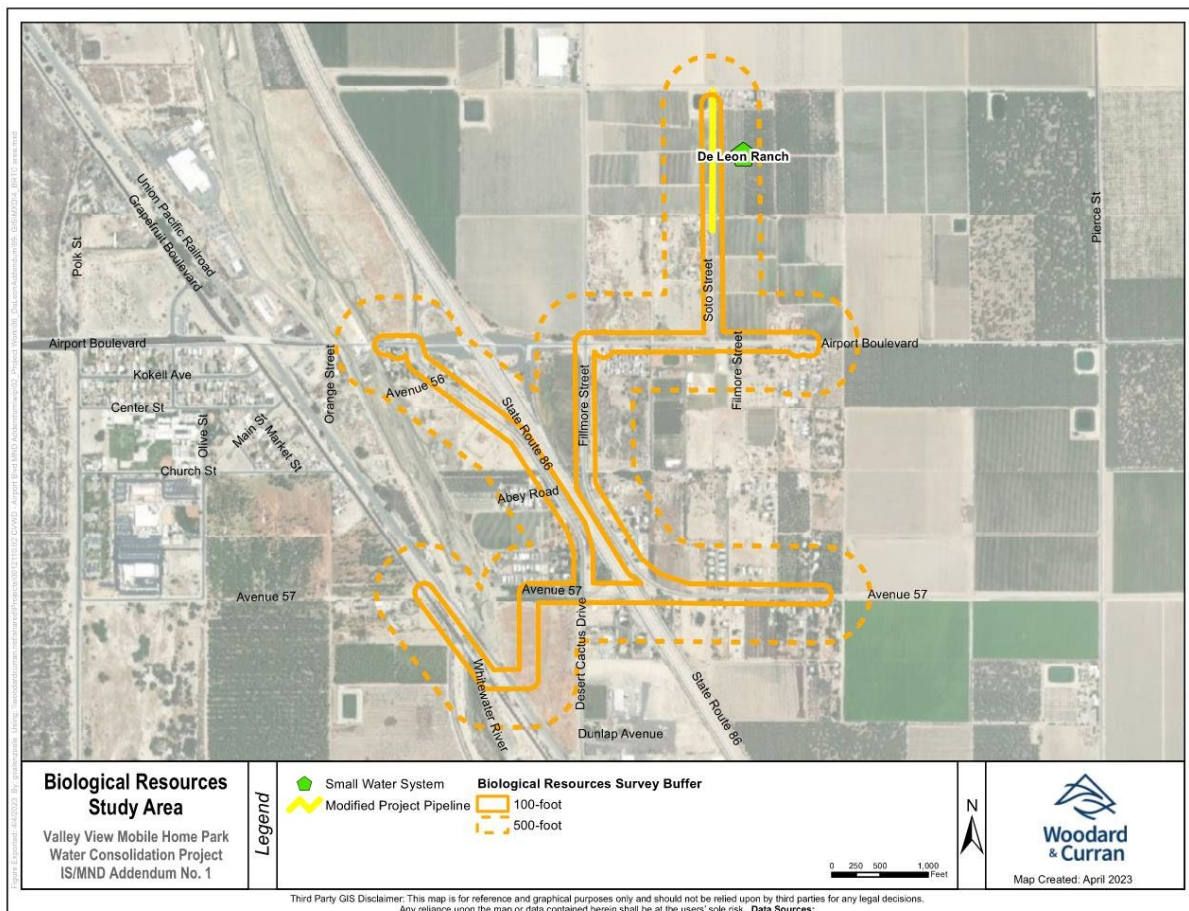
Biological Resources

As explained in Section 1.4 Evaluation of Environmental Impacts, resource areas that were found to have No Impact or Less than Significant Impact in the MND, and for which

the Modified Project would also result in a finding of No Impact or Less than Significant Impact, are not analyzed further in this Addendum. This includes checklist question (f) under Biological Resources. The resource areas under checklist questions (a), (b) (c) (d) and (e) are analyzed.

The following analysis relies on a Biological Resources Technical Study that was prepared in April 2021 by Rincon Consultants, Inc. for the Airport Boulevard Sewer Consolidation Project MND. The Modified Project would change the location of the potable water pipeline extension to De Leon Ranch to match the location of the sewer main alignment analyzed in the Airport Boulevard Sewer Consolidation Project MND, within the existing dirt road north of Soto Street between Soto Water SWS and De Leon Ranch SWS. Therefore, the Modified Project is located within the study area of the Airport Boulevard Sewer Consolidation Project MND Biological Resources Technical Study. The complete Biological Resources Technical Study is provided in **Appendix A**. The study area covered by the Biological Resources Technical Study is shown in **Figure 3-3**.

Figure 3-3: Biological Resources Technical Study Area



(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

Original Approved Project

The MND found 43 special status plant species and 26 special status wildlife species were previously recorded within a five-mile radius of the De Leon Ranch SWS. Although it was determined that the project alignment within existing roadways does not contain suitable habitat to support special status plant species, undeveloped land adjacent to the project was determined to contain marginally suitable habitat for western yellow bat (*Lasiurus xanthinus*), western mastiff bat (*Eumops perotis californicus*), and Burrowing owl (*Athene cunicularia*) and could be impacted by ground disturbance. **Mitigation Measures BIO-1 and BIO-2** would be implemented to reduce the potential to impact any roosting bats or burrowing owls.

In addition, there is habitat within and adjacent to the Original Approved Project area that is suitable for nesting birds, which are protected by the MBTA and the CFGC (FGC 3503 and 3503.5). 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 and indirect impacts to special status wildlife species and nesting birds would be less than significant.

Modified Project

According to the Biological Resources Technical Study which covers the Modified Project location, construction of the Modified Project would not be expected to impact special status plant or wildlife species because of the lack of suitable habitat within and adjacent to the pipeline alignment. Nonetheless, due to the presence of marginal habitat in the vicinity of the Modified Project, **Mitigation Measures BIO-1 and BIO-2** from the MND would be implemented to reduce the potential to impact any roosting bats or burrowing owls.

Similar to the Original Approved Project, habitat within and adjacent to the project alignment may contain suitable habitat for nesting birds. Construction of the Modified Project may result in impacts to adjacent nesting bird habitat from noise and dust, 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. If construction of the Modified Project would occur during the nesting season, **Mitigation Measure BIO-3** from the MND 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 and indirect impacts to special status wildlife species and nesting birds would be less than significant. No new impact would occur as a result of the Modified Project, and no new mitigation would be required.

(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

Original Approved Project

The MND determined no sensitive vegetation communities have been recorded within a five-mile radius of the Original Approved Project area. The project alignment is located primarily within developed urban and agricultural areas and no sensitive vegetation communities were observed within or adjacent to the project alignment. 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.

Modified Project

According to the Biological Resources Technical Study which covered the Modified Project location, the Modified Project area does not contain riparian habitat or other sensitive natural communities which could be impacted by construction activities. Therefore, no new impacts would occur, and no new mitigation would be required.

(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

Original Approved Project

Although a majority of the pipelines evaluated in MND are within existing roadways, a segment of the Original Approved Project intersects the Coachella Valley Stormwater Channel, which is potentially subject to USACE, Regional Water Quality Control Board (RWQCB), and CDFW jurisdiction. While impacts to the Coachella Valley Stormwater Channel have been avoided through the project design and permitting compliance process, adherence to **Mitigation Measure BIO-4**, which includes preparation of a Frac-Out Prevention and Contingency Plan, would also ensure potential indirect impacts to jurisdictional waters are minimized. In addition, the project contractor would be required to obtain and comply with the NPDES Construction General Permit requirements, and CVWD would obtain a Lake and Streambed Alteration Agreement (SAA) from the California Department of Fish and Wildlife (CDFW). Based on the project design, avoidance of the Coachella Valley Stormwater Channel, implementation of best management practices for pollution prevention, implementation of **Mitigation Measure BIO-4**, and adherence to the measures in the SAA, potential impacts to jurisdictional waters and wetlands would be less than significant.

Modified Project

According to the Biological Resources Technical Study which covered the Modified Project location, the Modified Project area consists of an existing dirt road, moderately well-drained soils, and developed land which could not support riparian/riverine habitat,

vernal pools, fairy shrimp habitat, or jurisdictional waters and wetlands. The Modified Project would not cross any water bodies subject to state or federal jurisdiction and would not be required to prepare a Frac-Out Prevention and Contingency Plan, or obtain an SAA from the CDFW. CVWD would implement best management practices for control of runoff during construction. No impacts would occur, and no new mitigation would be required.

(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

Original Approved Project

The MND determined the Original Approved Project footprint is mostly located within previously developed and disturbed areas that offer little to no value to wildlife movement, and direct impacts to wildlife movement as a result of project implementation would be less than significant.

However, trenchless construction under the Coachella Valley Stormwater Channel may require a limited amount of overnight work involving the use of floodlighting to prevent bore hole collapse. As such, **Mitigation Measure BIO-5** is recommended to reduce indirect wildlife movement impacts from floodlighting. Therefore, with implementation of **Mitigation Measure BIO-5**, the Original Approved Project would not inhibit wildlife movement and would have a less than significant impact.

Modified Project

According to the Biological Resources Technical Study which covered the Modified Project location, the Modified Project would not be located in or within the immediate vicinity of essential habitat connectivity areas and would not result in habitat fragmentation. The Modified Project would not involve nighttime work and, therefore, would not be required to reduce nighttime construction floodlighting. Therefore, no new impact would occur, and no new mitigation would be required.

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

Original Approved Project

The MND determined no protected trees would be removed due to construction of the Original Approved Project and the project would not conflict with Riverside County Ordinance 559.

However, the MND identified that the Coachella Valley Stormwater Channel Improvement Project – Avenue 54 to Thermal Drop Structure Project has a mitigation site that is located approximately 550 feet upstream of the Original Approved Project alignment that is subject to preservation and long-term management (vegetation management and invasive species control). Adherence to **Mitigation Measure BIO-6** would ensure

construction of the Original Approved Project would avoid the Coachella Valley Stormwater Channel Improvement Project mitigation site and in the event of unforeseen impacts to the mitigation site, the site shall be restored to ensure existing mitigation obligations are fulfilled. Therefore, with implementation of **Mitigation Measure BIO-6**, the Original Approved Project would not conflict with any local policy or ordinance protecting biological resources and would have a less than significant impact.

Modified Project

According to the Biological Resources Technical Study which covered the Modified Project location, the Modified Project area does not contain any trees that meet the criteria of protected under the Riverside County Ordinance 559. In addition, construction of the Modified Project would not be within or adjacent to the Coachella Valley Stormwater Channel and would have no potential to impact the Coachella Valley Stormwater Channel Improvement Project – Avenue 54 to Thermal Drop Structure Project mitigation site. Therefore, the project would not conflict with any local policy or ordinance. No impact would occur, and no mitigation would be required.

Mitigation Measures

To mitigate possible impacts to biological resources, CVWD shall implement **Mitigation Measures BIO-1, BIO-2, and BIO-3** which were previously adopted in the MND for the Original Approved Project. The impacts of the Modified Project are the same as the Original Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

Cultural Resources

The following analysis relies on a Cultural Resources Assessment Report that was prepared in April 2021 by Rincon Consultants, Inc. for the Airport Boulevard Project MND. The Modified Project would change the location of a previously planned potable water pipeline to match the location of the Airport Boulevard Sewer Consolidation Project MND sewer main alignment within the existing dirt road north of Soto Street between Soto Water SWS and De Leon Ranch SWS. Therefore, the Modified Project is located within the study area of the Airport Boulevard Sewer Consolidation Project MND Cultural Resources Assessment Report study area. The complete Cultural Resources Assessment Report is provided in **Appendix B**.

(a-c) Cause a substantial adverse change in the significance of a historical or unique archaeological resource pursuant to Section 15064.5 or disturb any human remains, including those interred outside of dedicated cemeteries

Original Approved Project

The MND found that although 26 cultural resources have been recorded within one-half-mile of the De Leon Ranch SWS, no previously recorded cultural resources are located or were observed within the Original Approved Project area. While the archaeological sensitivity of the project area is considered low based on the records search, there is

potential for ground-disturbing activities to expose previously unrecorded cultural resources. Implementation of **Mitigation Measure CUL-1** would require the initial ground-disturbing activities be observed by an archaeological and Native American monitor. Implementation of **Mitigation Measure CUL-2** would require that all earth disturbing work be temporarily suspended if cultural resources are discovered during construction. Implementation of **Mitigation Measure CUL-3** would 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**, the 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.

Modified Project

According to the Cultural Resources Assessment Report conducted for the Airport Boulevard Sewer Consolidation Project MND, which covers the Modified Project location, the archaeological sensitivity of the Modified Project area is considered low based on the level of existing development and disturbance. However, similar to the Original Approved Project, there is potential for ground-disturbing activities to expose previously unrecorded cultural resources. Implementation of **Mitigation Measures CUL-1 through CUL-3** from the MND would ensure no new impact would occur and no additional mitigation measures would be needed.

Mitigation Measures:

To mitigate possible impacts to cultural resources, CVWD shall implement **Mitigation Measures CUL-1, CUL-2, and CUL-3** which were previously adopted in the MND for the Original Approved Project. The impacts of the Modified Project are the same as the Original Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

Hazards and Hazardous Materials

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

(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

Original Approved Project

The MND found that construction of the Original Approved Project has the potential to create a hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials (e.g., gasoline,

diesel fuel, hydraulic fluids, paint) into the environment. Implementation of **Mitigation Measure HAZ-1** would require the construction contractor to develop and implement a Hazardous Materials Management Spill Prevention and Control Plan that includes project-specific contingencies. The risk of spills related to hazardous materials that may be transported or used during routine maintenance would be minimized through following existing CVWD protocols for maintenance activities at its existing facilities. Therefore, impacts from hazardous materials to the public or the environment from potential accidents would be reduced to a less-than-significant level with the implementation of **Mitigation Measure HAZ-1**.

Modified Project

The Modified Project involves the same method of pipeline construction as the Original Approved Project. Therefore, no changes in impact type or severity are anticipated. The Modified Project would also implement **Mitigation Measure HAZ-1**, which was previously adopted as part of the MND, to minimize the risk of hazardous material exposure during construction. Furthermore, similar to the Original Approved Project, the risk of hazardous materials release during operation of the Modified Project would be minimized by following existing CVWD protocols for maintenance activities. Impacts of the Modified Project would be comparable to those of the Original Approved Project with the implementation of previously adopted **Mitigation Measure HAZ-1**. Therefore, no new impact would occur, and no new mitigation would be required.

(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

Original Approved Project

A regulatory records search was conducted for the Original Approved Project area using the State Water Resource's Control Board (SWRCB)'s GeoTracker and the California Department of Toxic Substances Control (DTSC)'s EnviroStor databases and did not indicate the presence of active hazardous materials cleanup sites within the Original Approved Project area. Therefore, construction and operation associated with the Original Approved 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.

Modified Project

The regulatory records search of the SWRCB GeoTracker and DTSC's EnviroStor databases conducted as part of the MND covered the area of the Modified Project alignment. Therefore, there is no presence of active hazardous materials cleanup sites within the Modified Project area. As a result, no new impacts would occur, and no new mitigation would be required.

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

Original Approved Project

The MND determined construction of the Original Approved Project would temporarily block access to roadways and driveways that are currently used by emergency response vehicles or in emergency evacuations. Implementation of **Mitigation Measure TRA-1** would ensure communication with emergency response agencies to develop emergency access strategies in a traffic control plan. Operation of the Original Approved Project would not physically impair or otherwise interfere with emergency response or evacuation in the project vicinity. Thus, impacts would be less than significant with mitigation.

Modified Project

The Modified Project would implement **Mitigation Measure TRA-1**, which was previously adopted as part of the MND, to minimize potential impacts to an emergency response or an emergency evacuation plan. Therefore, no new impact would occur, and no new mitigation would be required.

Mitigation Measures

To mitigate unanticipated exposure to hazardous materials and physical interference with evacuations and emergencies during construction and operation, CVWD shall implement **Mitigation Measure HAZ-1** and **TRA-1** which were previously adopted in the MND for the Original Approved Project. Impacts of the Modified Project are the same as the Original Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

Hydrology and Water Quality

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

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

Original Approved Project

Construction of the Original Approved Project could result in short-term erosion/sedimentation that has the potential to impact water quality. Because of the Original Approved Project size (over one-acre of land disturbance), the project contractor would be required to obtain a NPDES General Permit for Discharges of Storm Water Associated with Construction Activity - Construction General Permit (Order 2009-0009-DWQ). Coverage under the SWRCB's Construction General Permit requires preparation and implementation of a SWPPP containing BMPs to control sediment and other construction-related pollutants in storm water discharges.

Installation of the transmission pipe under the Coachella Valley Stormwater Channel would require trenchless HDD methods, which has the potential to impact water quality within the channel if the bentonite drilling fluid were to accidentally leak (i.e., “frac-out”) or otherwise run off into the channel. Implementation of **Mitigation Measure BIO-4** would require the HDD contractor to develop and implement a Frac-Out Prevention and Contingency Plan. With implementation of **Mitigation Measure BIO-4**, the SWPPP, and the CDFW SAA, the Original Approved Project would not violate water quality standards or waste discharge requirements or otherwise degrade surface or groundwater quality. Impacts would be less than significant.

Modified Project

Similar to the Original Approved Project, construction of the Modified Project could result in short-term erosion/sedimentation that has the potential to impact water quality. As discussed in *Section 2.4.5 Construction Best Management Practices*, BMPs would be used during construction to prevent polluted runoff from leaving the construction site, and the contractor would be required to obtain an NPDES Construction General Permit and as a result, would be required to develop a SWPPP. With implementation of the SWPPP, storm water discharges from the Modified Project site during construction are not expected to violate existing water quality standards or waste discharge requirements set by the RWQCB.

However, the Modified Project does not require trenchless construction and would not be required to obtain an SAA. The Modified Project would not be expected to violate water quality standards or waste discharge requirements or otherwise degrade surface or groundwater quality because it would comply with all existing regulations and permits. Impacts would be less than significant, and no mitigation measures would be required.

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

Original Approved Project

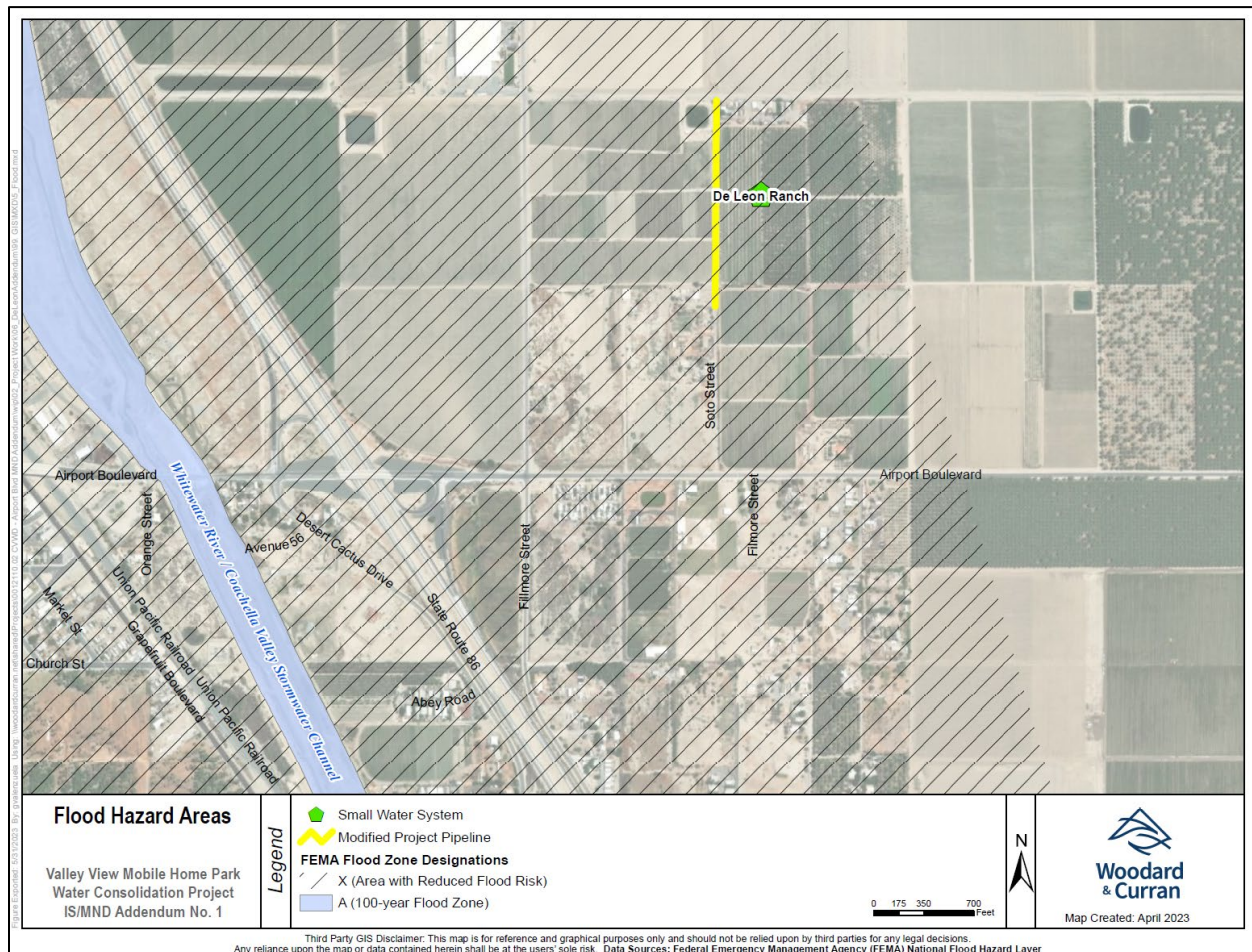
The MND found that the Original Approved Project would unlikely become inundated by flood, seiche or tsunami and the potential for release of pollutants is low. The Original Approved Project area is located approximately 80 miles from the Pacific Ocean and approximately 60 miles from Lake Perris and Lake Elsinore, the only two waterbodies in Riverside County considered to have potential for a damaging seiche to be seismically generated. In addition, the only portion of the Original Approved Project located in a flood hazard zone is the Coachella Valley Stormwater Channel crossing, and this portion would be installed on an existing bridge. For these reasons, the risk of pollutant release from flood, tsunami, or seiche is low and impacts are less than significant.

Modified Project

The Modified Project is similarly unlikely to become inundated by seiche or tsunami given the distance from the Pacific Ocean, Lake Perris, and Lake Elsinore. As shown in **Figure**

3-4, the Modified Project area is not located within or adjacent to a Federal Emergency Management Agency (FEMA) 100 or 500-year flood zone (FEMA 2021). In addition, there is no associated risk of floods inundating pipelines because they would be installed below-ground and the potential for release of pollutants is low. Therefore, there would be no new impacts as a result of the Modified Project and no new mitigation would be required.

Figure 3-4: Flood Hazard Areas



Mitigation Measures

None required.

Land Use and Planning

As explained in Section 1.4 Evaluation of Environmental Impacts, resource areas that were found to have No Impact or Less than Significant Impact in the MND, and for which the Modified Project would also result in a finding of No Impact or Less than Significant Impact, are not analyzed further in this Addendum. This includes checklist question (a) under Land Use and Planning. The resource area under checklist question (b) is analyzed.

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?

Original Approved Project

The Original Approved Project 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 and all applicable permits and approvals. All surfaces would be restored to pre-construction conditions upon completion of construction. Therefore, it would not conflict with 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.

The Coachella Valley Stormwater Channel Improvement Project – Avenue 54 to Thermal Drop Structure Project has a mitigation site that is located approximately 550 feet upstream of the Airport Boulevard bridge and encompasses streambed and stream-associated habitat. Adherence to **Mitigation Measure BIO-6** would ensure construction of the Original Approved Project would avoid the Coachella Valley Stormwater Channel Improvement Project mitigation site and in the event of unforeseen impacts to the mitigation site, the site shall be restored to ensure existing mitigation obligations are fulfilled. With mitigation, impacts would be less than significant.

Modified Project

Similar to the Original Approved Project, the Modified Project would install below-grade pipelines and would restore all surfaces to pre-construction conditions. It would comply with all applicable permits and approvals identified in Section 2.5 Permits and Approvals. However, construction of the Modified Project would not occur within or near the Coachella Valley Stormwater Channel. Thus, the Modified Project would not be required to avoid the Coachella Valley Stormwater Channel Improvement Project mitigation site or, in the event of unforeseen impacts to the mitigation site, restore the site to ensure existing mitigation obligations are fulfilled. Therefore, the Modified Project would not conflict with 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.

Mitigation Measures:

None required.

Noise

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

(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

Original Approved Project

Construction of the Original Approved 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 847 and acceptable noise levels are established in the County's General Plan. Construction would result in temporary and periodic noise increases and 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. In addition, truck traffic could generate excessive noise to residences adjacent to construction areas and along haul routes. This impact would be reduced to a less-than-significant level with the implementation of **Mitigation Measure NOI-1**, which requires the construction contractor to implement the best available noise control techniques and equipment.

Once operational, the pipelines are not expected to result in a permanent increase in noise, other than noise associated with occasional vehicle maintenance trips. Therefore, the Original Approved Project would have less-than-significant long-term noise impacts with implementation of **Mitigation Measure NOI-1**.

Modified Project

The potential for noise generation during construction of the Modified Project is the same as that of the Original Approved Project. Truck trips associated with construction of the Modified Project would be comparable to the Original Approved Project and have the potential to impact noise-sensitive land uses adjacent to construction areas and haul routes. **Mitigation Measure NOI-1**, which requires the construction contractor to implement construction noise reduction measures and was previously adopted as part of the MND, would also apply to the Modified Project. With implementation of the same mitigation specified in the MND, temporary construction noise impacts associated with the Modified Project would be similar to the impacts of the Original Approved Project. There would be no new impacts as a result of the Modified Project and no new mitigation would be required.

Operation of the Modified Project would not differ from operation of the Original Approved Project. Pipeline operation would not generate noise impacts associated with occasional maintenance vehicle trips beyond those impacts analyzed in the MND. Therefore, the permanent ambient noise impact from operation of the Modified Project would remain less than significant. There would be no new impacts as a result of the Modified Project and no new mitigation would be required.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Original Approved Project

Construction of the Original Approved Project has the potential to cause groundborne vibration and groundborne noise. Although groundborne vibration from construction of the project is expected to attenuate to reach a less than significant level by the time it reaches the nearest sensitive receptors, implementation of the groundborne vibration control measures in **Mitigation Measure NOI-1** would ensure construction-related vibration levels would be reduced to less than significant.

Once operational, the Original Approved Project pipeline would be below-ground and is not expected to result in a permanent source of groundborne vibration. Vehicles associated with occasional maintenance trips would have minimal vibration impacts. Operational vehicle maintenance trips would occur during daytime hours, consistent with the Riverside County Noise Ordinance and City of Coachella Municipal Code. Therefore, the Original Approved pipeline would have less than significant long-term vibration impacts.

Modified Project

Similar to the Original Approved Project, construction of the Modified Project has the potential to cause groundborne vibration and noise. While construction related impacts would also be expected to attenuate to less than significant, implementation of **Mitigation Measure NOI-1** would ensure impacts would be reduced to less than significant. Operation of the Modified Project would be the same as the Original Approved Project and would also have less than significant long term vibration impacts. With implementation of **Mitigation Measure NOI-1**, construction and operational impacts associated with groundborne vibrations would be less than significant.

Mitigation Measures

To mitigate possible temporary construction noise impacts of the Modified Project, CVWD shall implement **Mitigation Measure NOI-1** which was previously adopted in the MND for the Original Approved Project. Impacts of the Modified Project are the same as the Original Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

Transportation

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

(a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities

Original Approved Project

The MND found that construction of the Original Approved Project would not conflict with regional transportation plans, including the Riverside County Transportation Commission's Congestion Management Program, the Coachella Valley Association of Government's studies, or the Southern California Association of Government's Regional Transportation Plan/Sustainable Communities Strategy. Construction would be temporary, and potential traffic-related impacts would not occur in the same location over the 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. However, although construction-related traffic impacts would be temporary, individual traffic lane closures may be necessary and the Original Approved Project would be required to comply with a County-approved Traffic Control Plan. To ensure the appropriate traffic controls are implemented and potential traffic impacts related to lane closures are less than significant, the Original Approved Project shall implement **Mitigation Measure TRA-1**. Operation of the Original Approved Project would not have a permanent impact on circulation. Therefore, the MND found that coordination with emergency responders and development of an approved Traffic Control Plan through implementation of **Mitigation Measure TRA-1** would result in potential traffic impacts related to road closures and detours would be less than significant.

Modified Project

Similar to the Approved Project, the Modified Project would also require temporary lane closures during construction. **Mitigation Measure TRA-1**, which requires the construction contractor to implement an approved Traffic Control Plan and was previously adopted as part of the MND, would also apply to the Modified Project. With implementation of the same mitigation specified in the MND, temporary traffic impacts associated with the Modified Project would be similar to the impacts of the Original Approved Project.

Operation of the Modified Project would not differ from operation of the Original Approved Project. Once operational, the Modified Project would not conflict with regional transportation plans because it would install below-ground pipelines that would not create any permanent impact to existing roadways or an increase in the number of service vehicles in use. CVWD would continue to operate its potable water system with no operational modifications using standard vehicles. Long-term impacts on the circulation system plans from operation of the Modified Project would remain less than significant. There would be no new impacts as a result of the Modified Project and no new mitigation would be required.

(d) Result in inadequate emergency access

Original Approved Project

Construction of the Original Approved Project may require temporary lane closures that have the potential to hinder emergency vehicle access. In order to prevent construction from interfering with emergency responders, implementation of **Mitigation Measure TRA-1** would require CVWD's Project Manager to coordinate with the police, fire, and other emergency services to alert these entities about potential construction delays, project alignment, and construction schedule. CVWD would also be required to minimize the duration of disruptions/closures to roadways and critical access points for emergency services. With implementation of **Mitigation Measure TRA-1**, impacts would be reduced to less than significant.

Original Approved Project

Construction activities of the Modified Project would be consistent with those analyzed in the MND and may require lane closures that could temporarily hinder emergency vehicle access. Implementation of **Mitigation Measure TRA-1**, which was previously adopted as part of the MND, would require emergency crews to be informed of potential construction delays or lane closures. Implementation of the previously adopted **Mitigation Measure TRA-1** would reduce potential impacts to less than significant. Therefore, there would be no new impacts as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures

To mitigate possible impacts to circulation and emergency access during construction, CVWD shall implement **Mitigation Measure TRA-1**, which was previously adopted in the MND for the Original Approved Project. The Modified Project impacts are the same as the Original Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

Tribal Cultural Resources

The following analysis relies on a Cultural Resources Assessment Report that was prepared in April 2021 by Rincon Consultants, Inc. for the Airport Boulevard Sewer Consolidation Project MND. The Modified Project location matches the location of the sewer main alignment to serve De Leon Ranch: within the existing dirt road north of Soto Street between Soto Water SWS and De Leon Ranch SWS. Therefore, the Modified Project is located within the study area of the Airport Boulevard Sewer Consolidation Project MND Cultural Resources Assessment Report study area. The complete Cultural Resources Assessment Report is provided in **Appendix B**.

(a) 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 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 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

Original Approved Project

The MND found no tribal cultural resources have been recorded or identified within the Original Approved Project area. Much of the project area has been previously disturbed and therefore the possibility of encountering intact surface tribal cultural resources is considered low. Nonetheless, construction requires ground-disturbing activities such as excavation which have the potential to expose previously unrecorded tribal cultural resources. The Cultural Resources Assessment Report found that no recorded tribal cultural resources have been identified within the Airport Boulevard Project area. However, although no tribal cultural resources were identified that would be directly impacted, two tribes indicated the presence of a village in the vicinity of the Airport Boulevard Sewer Consolidation Project area of potential effects (APE), located approximately 1.25 miles west of the APE (CA-RIV-148). Although the village site is outside of the project area, the use-area of the village likely spans several square miles. Implementation of **Mitigation Measure CUL-1** would require the initial ground-disturbing activities be observed by an archaeological and Native American monitor. Implementation of **Mitigation Measure CUL-2** would require that all earth disturbing work be temporarily suspended if cultural resources, including tribal cultural resources, are discovered during construction. Implementation of **Mitigation Measure CUL-3** would ensure proper procedures are 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 cultural resources would be reduced to less than significant.

Modified Project

According to the Cultural Resources Assessment Report which covered for the Modified Project location, the archaeological sensitivity of the Modified Project area is considered low based on the level of existing development and disturbance. However, the lack of surface archaeology sites does not preclude their subsurface existence. Similar to the Original Approved Project, there is potential for ground-disturbing activities to expose previously unrecorded tribal cultural resources. Implementation of **Mitigation Measures CUL-1 through CUL-3** from the MND would ensure no new impact would occur and no additional mitigation measures would be needed.

Mitigation Measures

To mitigate possible impacts to tribal cultural resources, CVWD shall implement **Mitigation Measures CUL-1, CUL-2, and CUL-3** which were previously adopted in the MND for the Original Approved Project. The impacts of the Modified Project are the same as the Original Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

Wildfire

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

(a) Substantially impair an adopted emergency response plan or emergency evacuation plan

Original Approved Project

The MND found that construction of the Original Project would temporarily block access to 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. Long-term, the Original Approved 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 incorporated.

Modified Project

Similar to the Original Approved Project, the Modified Project would also require temporary lane closures during construction. Implementation of **Mitigation Measure TRA-1** would require CVWD to develop a Traffic Control Plan, which would reduce conflict between Project construction activities and emergency services (police, fire, and others) by requiring identification of roadways and access points for emergency services and requiring that disruptions to or closures of these locations be minimized. All surfaces would be returned to pre-construction conditions after excavation, and implementation of the Modified Project would not add any additional vehicle trips for operation and maintenance. Therefore, there would be no new impacts as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures

To mitigate possible impacts to emergency access during construction, CVWD shall implement **Mitigation Measure TRA-1**, which was previously adopted in the MND for the

Original Approved Project. The Modified Project impacts are the same as the Original Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

4. CONCLUSIONS

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

5. FEDERAL CROSS-CUTTING ENVIRONMENTAL REGULATION EVALUATION

The Modified Project, as a part of the Original Approved Project, may receive funding under a state 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 program, this Addendum includes analyses pertinent to several federal cross-cutting regulations (also referred to as federal cross-cutters, CEQA-Plus, or Tier 2). The basic rules for complying with cross-cutting federal authorities are set-out in the State Water Resources Control Board (SWRCB) Clean Water State Revolving Fund (CWSRF) regulations at 40 CFR §35.3145 and the United States Department of Agriculture (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 CWSRF Program Federal Cross-cutting Environmental Regulations Evaluation Form for Environmental Review and Federal Coordination. The CWSRF Program is partially funded by the United States Environmental Protection Agency (US EPA). Therefore, the SWRCB must document that projects meet the federal cross-cutter requirements.

Federal Endangered Species Act

As described in the Biological Resources section, a Biological Resources Technical Study was prepared in April 2021 by Rincon Consultants, Inc. for the Airport Boulevard Sewer Consolidation Project MND (State Clearinghouse No. 2021090585) (**Appendix A**). The Modified Project would change the location of the proposed Valley View MHP Water Consolidation Project potable water pipeline to serve De Leon Ranch to match the location of the sewer main alignment to serve De Leon Ranch: within the existing dirt road north of Soto Street between Soto Water and De Leon Ranch. The location for the sewer pipeline to De Leon Ranch was studied in the Airport Boulevard Sewer Consolidation Project MND and accompanying Biological Resources Technical Study. Therefore, the Modified Project is located within the study area of the Airport Boulevard Project MND Biological Resources Technical Study.

With the implementation of **Mitigation Measure BIO-3** from the MND, which requires pre-construction nesting bird clearance surveys if construction activities occur during the nesting season, the Modified Project would have no effect to the federally-protected species under the Federal Endangered Species Act. The Modified Project would not jeopardize any listed species and the lead agency would be in compliance with the Federal Endangered Species Act.

National Historic Preservation Act

As described in the Cultural Resources section, a Cultural Resources Assessment Report was prepared in April 2021 by Rincon Consultants, Inc. for the Airport Boulevard Sewer

Consolidation Project MND (State Clearinghouse No. 2021090585) (**Appendix B**). The Modified Project would change the location of the proposed Valley View MHP Water Consolidation Project potable water pipeline to serve De Leon Ranch to match the location of the sewer main alignment to serve De Leon Ranch: within the existing dirt road north of Soto Street between Soto Water SWS and De Leon Ranch SWS. The location for the sewer pipeline to De Leon Ranch was studied in the Airport Boulevard Sewer Consolidation Project MND and accompanying Cultural Resources Assessment Report. Therefore, the Modified Project is located within the study area of the Airport Boulevard Project MND Cultural Resources Assessment Report.

With the implementation of **Mitigation Measures CUL-1, CUL-2, and CUL-3** from the MND, which require archaeological monitoring during ground disturbing activities; halting work if a resource is found until it can be evaluated; and appropriately handling resources, if discovered, the Modified Project would not significantly impact cultural resources and would be in compliance with the National Historic Preservation Act. No new impact would occur as a result of the Modified Project, and no new mitigation would be required. No effects to historic properties under the National Historic Preservation Act for the Modified Project would be expected.

Archaeological and Historic Preservation Act

With the implementation of **Mitigation Measures CUL-1, CUL-2, and CUL-3** from the MND, the Modified Project would have no significant impact to cultural resources and thus would be in compliance the Archaeological and Historic Preservation Act. No new impact would occur as a result of the Modified Project, and no new mitigation would be required. The Modified Project is expected to result in no effects to scientific, prehistoric, historic, and archaeological materials and data under the Archaeological and Historic Preservation Act.

Clean Air Act

The Modified Project equipment and construction methods used for construction of the Modified Project will be the same as those analyzed for the Original Approved Project, however the Modified Project would require approximately 3,200 linear feet less pipeline. Therefore, emissions estimated for the Approved Project are higher than emissions estimated for the Modified Project because construction equipment and methods are the same but the Modified Project would require less equipment use, worker vehicle trips, and material hauling. Evaluation of the Original Approved Project was included in the MND and found to be well below the General Conformity de minimis thresholds. As a result, the cumulative pollutant emissions from the Modified Project would not exceed federal General Conformity de minimis thresholds and the lead agency would be in compliance with the Clean Air Act.

Coastal Zone Management Act

As described in the Hydrology and Water Quality section, the Modified Project area is located approximately 80 miles east of the Pacific Coast. Therefore, no portion of the

Modified Project is within the coastal zone and the Coastal Zone Management Act does not apply.

Farmland Protection Policy Act

As described in the Agriculture and Forestry Resources section, agricultural land adjacent to the Modified Project is classified as Prime Farmland and Farmland of Local Importance (**Figure 3-1**) and there are no Williamson Act contracted protected farm lands within the Modified Project area (**Figure 3-2**). Similar to the Original Approved Project, the Modified Project would be constructed within existing rights-of-way and disturbed surfaces would be restored to pre-construction conditions. The Modified 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. No new impact would occur as a result of the Modified Project and no new mitigation would be required. The Modified Project is expected to result in no effects to farmland areas and the lead agency would be in compliance with the Farmland Protection Policy Act.

Executive Order 11988 – Floodplain Management, as amended by Executive Orders 12148 and 13690

As described in the Hydrology and Water Quality section, the Modified Project area is not located within or adjacent to a FEMA 100 or 500-year flood zone (**Figure 3-4**). Similar to the Original Approved Project, the Modified Project would be constructed entirely within existing rights-of-way. Therefore, no changes in type or severity of impacts are anticipated. The Modified Project would have no effect and be in compliance with Executive Order 11988.

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

As described above, the Modified Project is located within the study area of the Biological Resources Technical Study prepared for the Airport Boulevard Sewer Consolidation Project MND.

Similar to the Airport Boulevard Project, nesting habitat adjacent to the Modified Project alignment may be suitable for bird species common in the area, and nesting birds are likely to be present during the nesting season. If construction cannot be avoided during nesting season, implementation of **Mitigation Measure BIO-1** from the MND would reduce potential impacts on nesting birds. No new impact would occur as a result of the Modified Project, and no new mitigation would be required. Thus, there would be no effect and the lead agency would be in compliance with the Federal Migratory Birds Treaty Act, Bald and Golden Eagle Protection Act, and Executive Order 13168.

Fish and Wildlife Coordination Act

Similar to the Original Approved Project, the Modified Project would not impound, divert, or control a surface water source. Operation of the Modified Project would not

substantially decrease groundwater supplies or interfere with groundwater recharge such that there would be an effect on fish and wildlife resources. Therefore, the Modified Project would not conflict with the Fish and Wildlife Coordination Act.

Executive Order 11990 – Protection of Wetlands

As described in the Biological Resources section, the Modified Project area does not support federally protected wetlands as defined by Clean Water Act Section 404 and no waters or wetlands potentially subject to the jurisdiction of the USACE, RWQCB, or CDFW are located within the Modified Project area. Therefore, there would be no impact to wetlands and the lead agency would be in compliance with Executive Order 11990.

Executive Order 13112 – Invasive Species

Similar to the Original Approved Project, the Modified Project would implement construction best management practices that suppress dust and contain sedimentation and runoff from the site (see *Section 2.4.5 Construction Best Management Practices*). In areas where revegetation is required, use of native species would be required, per the SWPPP, to ensure that introduction of invasive species does not occur. The lead agency would therefore be in compliance with Executive Order 13112.

Wild and Scenic Rivers Act

Similar to the Original Approved Project, there are no designated Wild and Scenic Rivers within the Modified Project area, nor would any designated rivers be affected by the Modified Project. Therefore, the Modified Project would not result in any impacts related to the Wild and Scenic Rivers Act.

Safe Drinking Water Act, Sole Source Aquifer Program

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

Executive Order 13195 – Trails for America in the 21st Century

Similar to the Original Approved Project, the Modified Project would have no effect on trails and the lead agency would be in compliance with Executive Order 13195.

Executive Order 13007 – Indian Sacred Sites

As described in the Tribal Cultural Resources section, a Cultural Resources Assessment Report was prepared in April 2021 by Rincon Consultants for the sewer pipeline serving De Leon Ranch, a component of the Airport Boulevard Sewer Consolidation Project MND (**Appendix B**). As described above, the Modified Project is located within the study area

of the Airport Boulevard Sewer Consolidation Project MND Cultural Resources Assessment Report.

The Cultural Resources Assessment Report found that no recorded tribal cultural resources have been identified within the Airport Boulevard Project area. However, although no Indian sacred sites were identified that would be directly impacted, two tribes indicated the presence of a village in the vicinity of the Airport Boulevard Sewer Consolidation Project area of potential effects (APE), located approximately 1.25 miles west of the APE (CA-RIV-148). Although the village site is outside of the project area, the use-area of the village likely spans several square miles. While the Modified Project would only disturb a limited area, there remains a possibility that previously unknown cultural resources could be encountered during construction. With the implementation of **Mitigation Measures CUL-1, CUL-2, and CUL-3** from the MND, the Modified Project would have a less than significant impact on tribal cultural resources. No new impact would occur as a result of the Modified Project, and no new mitigation would be required. The lead agency would be in compliance with Executive Order 13007.

Magnuson-Stevens Fishery Conservation and Management Act

Similar to the Original Approved Project, the Modified Project would not be located in or impact any US federal waters regulated under the Magnuson-Stevens Act. Therefore, the Modified Project would have no impact on resident or migratory fish or fish habitat and the lead agency would be in compliance with the Magnuson-Stevens Act.

Rivers and Harbors Act, Section 10

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

Wilderness Act

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

Environmental Justice

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

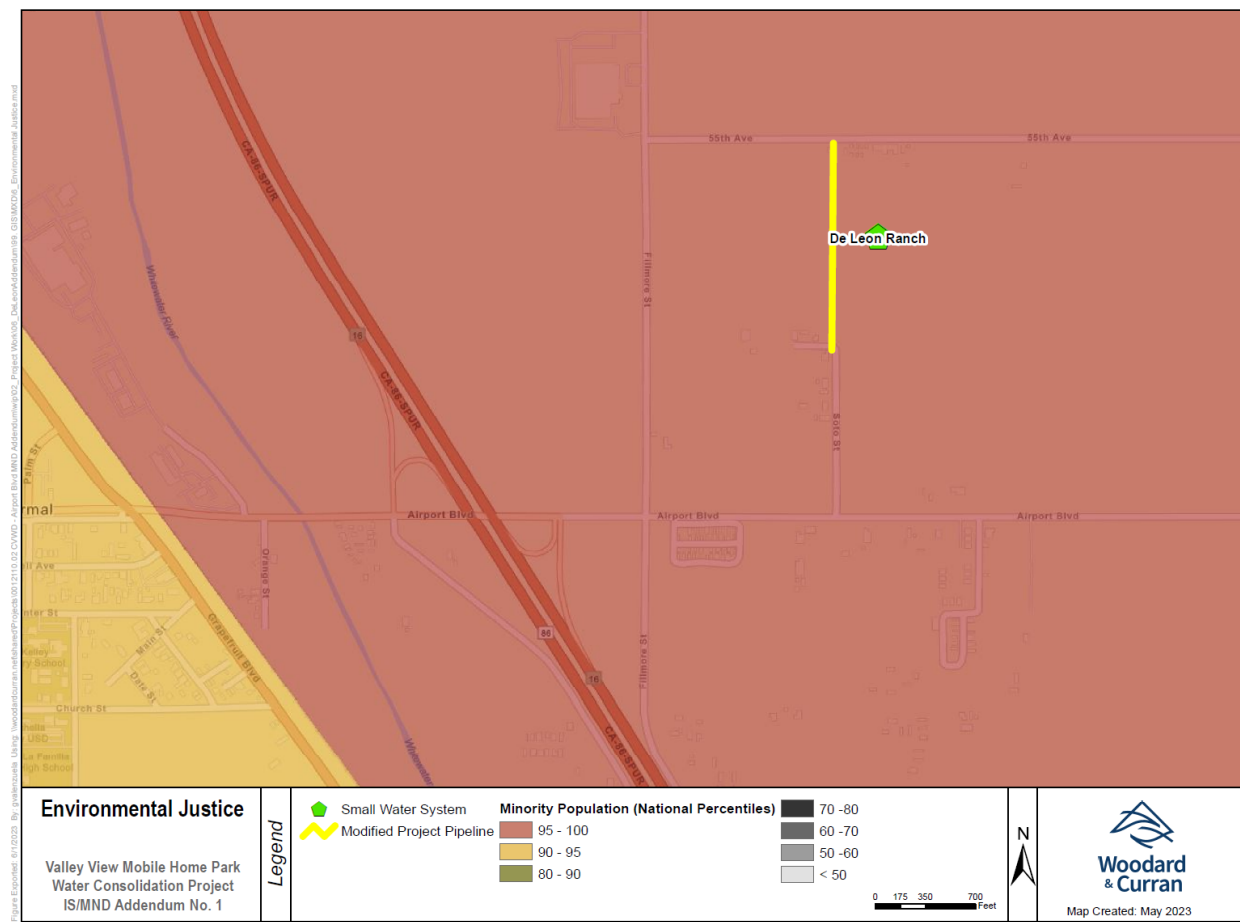
“The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation,

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 (US EPA 2022)".

According to US EPA guidelines, a minority population is present in a study area if the minority population of the affected area exceeds 50 percent, or if the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis.

The Modified Project would be located within the unincorporated community of Thermal in unincorporated Riverside County. According to the US EPA's Environmental Screening and Mapping Tool the entire Modified Project area is within the 90-95 percentile for minority population (US EPA 2022) (**Figure 5-1**). Therefore, similar to the Original Approved Project, the Modified Project area is composed of a minority population exceeding 50 percent.

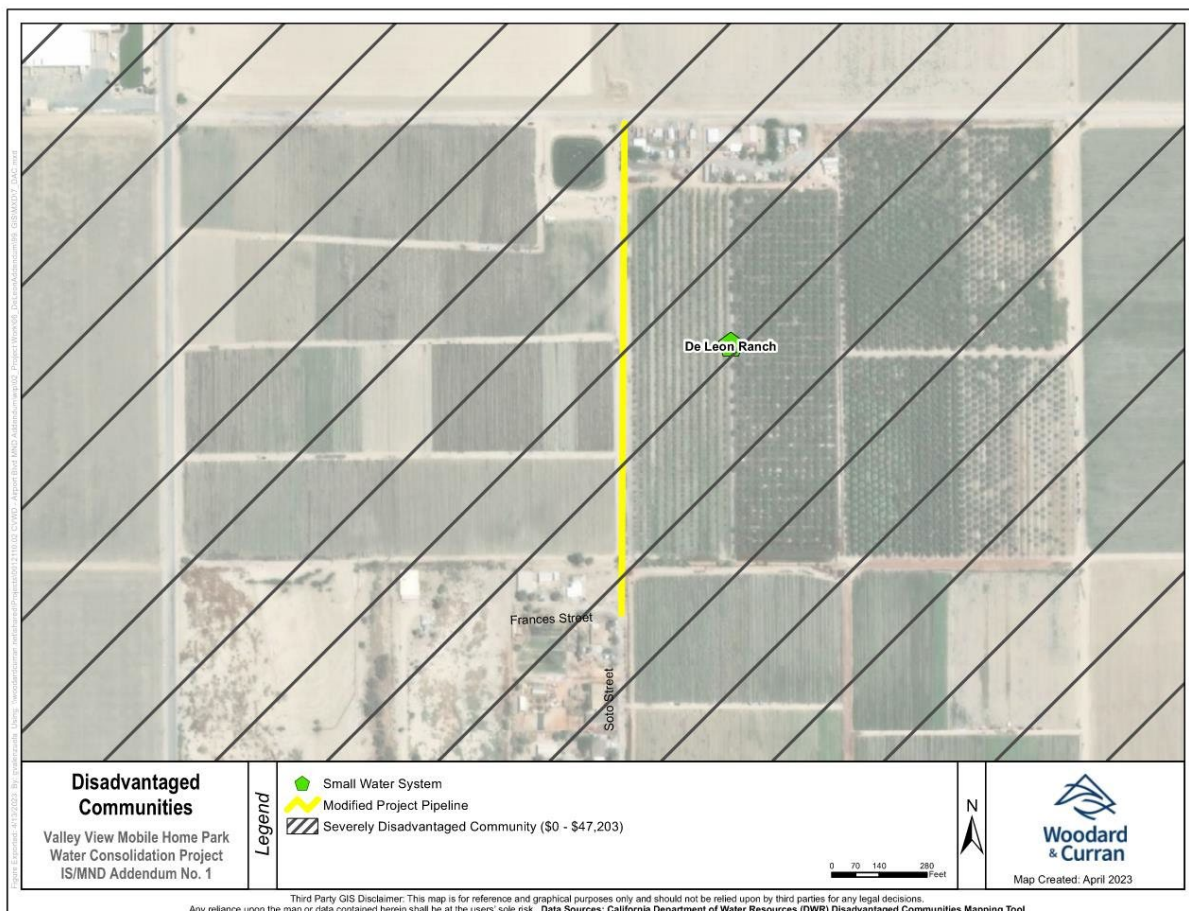
Figure 5-1: US EPA EJScreen Map of Minority Population



US EPA guidelines recommend that analyses of low-income communities consider the US Census Bureau's poverty level definitions, as well as applicable State and regional definitions of low-income and poverty communities. According to the 2017 to 2021 American Community Survey estimates, 40.2 percent of people in Thermal are considered to be in poverty (US Census Bureau 2021a). In comparison, the percentage of persons in poverty for the entire State of California was 12.3 percent for the same time period (US Census Bureau 2021b).

The California Department of Water Resources (DWR) defines a DAC as a community with a median household income (MHI) less than 80 percent of the California MHI, and a Severely Disadvantaged Community (SDAC) as a community with an MHI less than 60 percent of the California MHI. To identify the location of DAC and SDAC communities for its mapping tool, DWR (DWR n.d.), relies on 2016-2020 American Community Survey data, which defines the Statewide MHI as \$78,672. A DAC would therefore be a community with an MHI of \$62,938 or less and an SDAC would be a community with an MHI of \$47,203 or less. According to the DWR Mapping Tool as shown in **Figure 5-2**, the entire Modified Project area is located within a SDAC.

Figure 5-2: DWR DAC Mapping Tool



Impact Analysis

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

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

6. ALTERNATIVES ANALYSIS

The Modified Project would consolidate De Leon Ranch (Assessor's Parcel Number: 763-370-026) into CVWD's existing potable water system via a different alignment than was analyzed under the Valley View MHP Water Consolidation Project MND and Subsequent MND (SCH No. 2019079095). The Modified Project would relocate the previously planned potable water pipeline to the location of the Original Approved Project sewer main alignment in an existing dirt road north of Soto Street between Soto Water SWS and De Leon Ranch SWS (see **Figure 1-2**). Under the Modified Project, De Leon Ranch would be consolidated into CVWD's existing potable water system via the proposed 1,400 linear feet of potable water main north of Soto Street between Soto Water SWS and De Leon Ranch SWS. This is different from the alignment evaluated under the Valley View MHP Water Consolidation Project MND, in which De Leon Ranch would have been consolidated via approximately 4,600 linear feet of potable water main in Fillmore Street and Avenue 55 between Valley View MHP and De Leon Ranch.

The Modified Project would not result in a change to the consideration of alternatives evaluated in the MND. The alternatives considered in the MND were 1) No Project Alternative; and 2) Consolidate All SWSs Alternative. The alternatives analysis in the MND found the Original Approved Project was the preferred project because it achieves the project objectives as quickly as possible and is more financially viable than the No Project Alternative. The Modified Project would not result in any changes to the previous alternatives analysis included in the MND. Therefore, similar to the findings of the MND, the Modified Project is the selected alternative.

7. REPORT PREPARATION

This report was prepared by CVWD with support from Woodard & Curran. Staff from the agencies and companies that were involved include:

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- Glenn Lubbe, Associate Engineer, Domestic Water

Woodard & Curran

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8. REFERENCES

- Coachella Valley Water District (CVWD). 2021. "Airport Boulevard Sewer Consolidation Project Initial Study and Mitigated Negative Declaration". November.
- California Department of Conservation (DOC). 2023. California Williamson Act Enrollment 2022. Accessed May 16, 2023. Available online at: <https://gis.conservation.ca.gov/portal/home/item.html?id=aed46e5566a244fdafc8b276fb3fa791>
- California Department of Conservation (DOC). 2022. California Important Farmland: 2018. Accessed April 1, 2023. Available online at: <https://gis.conservation.ca.gov/portal/home/group.html?id=b1494c705cb34d01acf78f4927a75b8f#overview>.
- Federal Emergency Management Agency (FEMA). 2021. National Flood Hazard Layer Viewer. Accessed April 1, 2023. Available online at <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd>.
- Riverside County Flood Control and Water Conservation District. 2014. "Riverside County Whitewater River Region Stormwater Quality Best Management Practice Design Handbook for Low Impact Development." June.
- United States Census Bureau (US Census Bureau). 2021a. "Poverty Status in the Past 12 Months – Thermal CDP." Accessed April 10, 2023. Available online at: <https://data.census.gov/table?q=Thermal+CDP,+California&t=Income+and+Poverty&tid=ACST5Y2021.S1701>
- United States Census Bureau (US Census Bureau). 2021b. "Poverty Status in the Past 12 Months – California." Accessed April 10, 2023. Available online at: <https://data.census.gov/table?q=California&t=Income+and+Poverty&g=040XX00US06&tid=ACST5Y2021.S1701>
- United States Environmental Protection Agency (US EPA). 2022. "Environmental Justice." Accessed April 10, 2023. Available online at <https://www.epa.gov/environmentaljustice/learn-about-environmental-justice>