State Water Resources Control Board
Division of Financial Assistance
P.O. Box 944212
Sacramento, CA 94244

INITIAL STUDY
MITIGATED NEGATIVE DECLARATION

Project Title:	St. Anthony On-site Sewer and Water Distribution System
Lead Agency and Address:	State Water Resources Control Board Division of Financial Assistance 1001 I Street, 16th Floor Sacramento CA 95814
Applicant:	Pueblo Unido Community Development Corporation 78150 Calle Tampico, Suite 214 La Quinta, CA 92253
Contact Person: **and Phone Number:**	Kristen Way State Water Resources Control Board Kristen.Way @waterboards.ca.gov 916-341-5879 1001 I Street, 16th Floor Sacramento CA 95814
Project Location:	East of Lincoln Street between Avenue 66 and Avenue 68 in Community of Mecca, Riverside County, California
General Plan Designation:	AG (Agriculture; 1 du/10 ac. min.)
Zoning Designation:	W-2 (Controlled Development Areas)

CHAPTER 1: INTRODUCTION

PROJECT DESCRIPTION

Pueblo Unido Community Development Corporation (PUCDC) is proposing to construct the St. Anthony On-site Sewer and Water Distribution System (Project) which will include new on-site sewer, water, and stormwater systems to serve the St. Anthony's mobile home park (MHP). The Project is located immediately east of Lincoln Street and approximately 0.25 miles north of Avenue 68 in the unincorporated community of Mecca, Riverside County, California. The Project will develop retention basins, on-site water storage and water distribution system, and an on-site sewer collection system on approximately 32 acres.

After the Project is complete, the MHP will have an increased mobile home lot compacity of 134 and recreational amenities on site. These upgrades are addressed in the MHP Conditional Use Permit (CUP) 03645 initial study/ mitigated negative declaration (IS/MND) adopted by Riverside County Planning Department in August 2011. The environmental impacts of the increased mobile home lot compacity and recreational amenities were evaluated in the August 2011 IS/MND and will not be reevaluated in this document. This Project will provide drinking water and sewer services to the MHP consistent with the CUP 03645.

Project Background

The Coachella Valley Water District (CVWD) currently has an off-site gravity sewer, sewerage lift station, and force main system located within the Lincoln Street right-of-way. The lift station is located at the northeast corner of Lincoln Street and Avenue 68. The CVWD infrastructure includes an easterly lateral which will be used to serve the MHP. The Project will connect to the CVWD off-site gravity sewer and sewerage lift station.

The Conditional Use Permit (CUP) 03645 was granted to PUCDC by the Riverside County Planning Department with the goal of stabilizing the existing 95 spaces to provide adequate health and safety conditions enabling PUCDC to secure funding for the redevelopment of a new MHP in compliance with housing codes and regulations. The new MHP will be located in a vacant area within the parcel, west and north from the existing MHP, and will include the construction of on-site facilities. After sitework and wet and dry utility installation, families will relocate to the new area.

The PUCDC has applied for funding of the Project from the Clean Water and Drinking Water State Revolving Fund (SRF) programs administered by the State Water Resources Control Board (State Water Board), Division of Financial Assistance. The State Water Board is the CEQA lead for the Project.

Sewer Collection System

The existing on-site sewer system consists of one aerobic sewage pond and two evaporation ponds that receive effluent from septic tanks and unpermitted on-site sewer collection pipes. Sewage from the MHP flows by gravity to an existing on-site lift station and is pumped into the aerobic pond, and then into the evaporation ponds through a distribution system. Remaining solids are periodically removed and disposed of in an approved manner. Use of the existing system will continue until completion of the new sewage collection system. The aerobic and two evaporation ponds will be decommissioned as part of the Project.

The Project will involve the construction of on-site sewage collection system and laterals that will convey sewage from each residence at the MHP to the existing CVWD lift station at Lincoln Street and Avenue 68. The on-site sewer system will consist of approximately 32 manholes, approximately 2,200 linear feet of 4" laterals, and approximately 7,250 linear feet of 8" sewer main extending and connecting to the CVWD sewer line. During construction, existing mobile homes will be temporarily relocated until site improvements are completed.

After the MHP is connected to the CVWD sewer line, the decommissioning of the on-site sewage ponds will begin. A phased pond abandonment plan will be prepared and will begin with evaporation of existing liquids, followed by testing of the resulting sludge for contaminants. The remaining sludge will be allowed to dry in-situ for approximately one year. Based on soils testing, the remaining sludge will either be disposed of locally or sent to a United States Environmental Protection Agency (USEPA) approved solid waste disposal facility. During the construction process and prior to decommissioning of the ponds, the sewage pond area will continue to be perimeter-fenced with 6' high chain link, locked gates and inaccessible to the public.

Water Distribution System

The current on-site water system serves 95 Equivalent Dwelling Units (EDUs). The PUCDC has obtained a CUP 03645 to develop the MHP to 134 EDUs. The proposed on-site water distribution system will consist of approximately 8,350 linear feet of 6" water main interconnecting the dwelling units to an off-site water source described below. The on-site water distribution system will connect to CVWD's future off-site water main located under Lincoln Street, which borders the western boundary of the MHP. In addition, a 20,000-gallon hydropneumatics water storage tank will be located on the northeast corner of the Project area to serve as an emergency water supply and meet fire flow for the MHP.

The proposed on-site sewer and water lines will be buried beneath compacted soil to prevent deflections and low points in the lines where water and solids can accumulate and freeze or block the line. The Project will require a net import of approximately 41,468 cubic yards of fill material to raise portions of the site and ensure positive gravity flow to the CVWD lift station. Temporary relocation of mobile homes within the MHP site will be required during construction. Once each phase of construction is completed, mobile homes will be incrementally moved to the improved sections of the MHP.

Stormwater Retention System

To prevent flooding of the site or downstream properties, Riverside County (County) requires that the Project retain the runoff from a 100-year storm event. Per the County requirements, the Project will grade the entire site for properly engineered drainage, including dwelling unit pads and streets with curb and gutters to carry stormwater flow to on-site retention facilities to be located at the southernmost portion of the site with a combined storage capacity of approximately 284,484 cubic yards (CY; See Exhibit 5). The Project will also install subsurface tile drainage in accordance with the CVWD standards below the retention facilities with a gravel filtration system that allows stormwater to percolate into the groundwater basin. Stormwater will flow into the retention basins and percolate through the gravel filter and ultimately discharge shallow groundwater to the adjacent Lincoln Street agricultural drainage channel. This system will not interfere or conflict with the CVWD facilities or standard operating procedures for the existing drain system.

PURPOSE AND NEED

The Project is a key component of the redevelopment, upgrading and rehabilitation of the MHP serving farmworkers and other low-income families in the eastern Coachella Valley. The MHP is currently out of compliance with the Coachella Valley Water District and Environmental Health Department. The Project will replace the existing on-site substandard and out of compliance system and will connect the MHP to the community wastewater collection and treatment system operated by CVWD. These improvements will provide residents with safe, reliable, long-term wastewater, potable water, and stormwater services.

PROJECT LOCATION

The Project site is located immediately east of Lincoln Street and west of State Highway 111, between Avenue 66 and Avenue 68 in the unincorporated community of Mecca, Riverside County, California. All construction will occur within the MHP area. The Project site is located within APN 727-271-018. Please see Exhibits 1, 2, and 3.

ENVIRONMENTAL SETTING AND SURROUNDING LAND USES

The site is partially developed, relatively flat, and contains sparse native and predominantly non-native (tamarisk/salt cedar) vegetation. Land uses nearby and adjacent to the site includes wastewater treatment ponds, supporting the existing MHP, that will be decommissioned once the Project is complete. The balance of lands in the immediate vicinity are mainly vacant or fallow agricultural lands. The nearest residential development (13-units Huerta mobile home park) is located approximately 0.07 miles southwest of the Project site, on the west side of Lincoln Street. Highway 111 is located a short distance to the northeast and the urbanized portion of the community of Mecca is located approximately one-half mile to the north.

North: Vacant
South: Vacant, 68th Avenue
East: Vacant, Unpaved access road
West: CVWD agriculture drain, Lincoln Street, undeveloped desert land, small mobile home park

PROJECT ALTERNATIVES

The Project is specifically designed to meet the water, sewer, and stormwater protection needs of farm workers and low-income families living within the St. Anthony MHP. There are currently two potential on-site water well and distribution systems proposed as part of the Project, and both options have been equally considered in the analysis provided in this document. Due to the specific Purpose and Need of this Project, there are no feasible alternatives to the infrastructure improvements at the MHP that would satisfy the goals of the Project. No further alternative analysis is required.

RIVERSIDE COUNTY

N

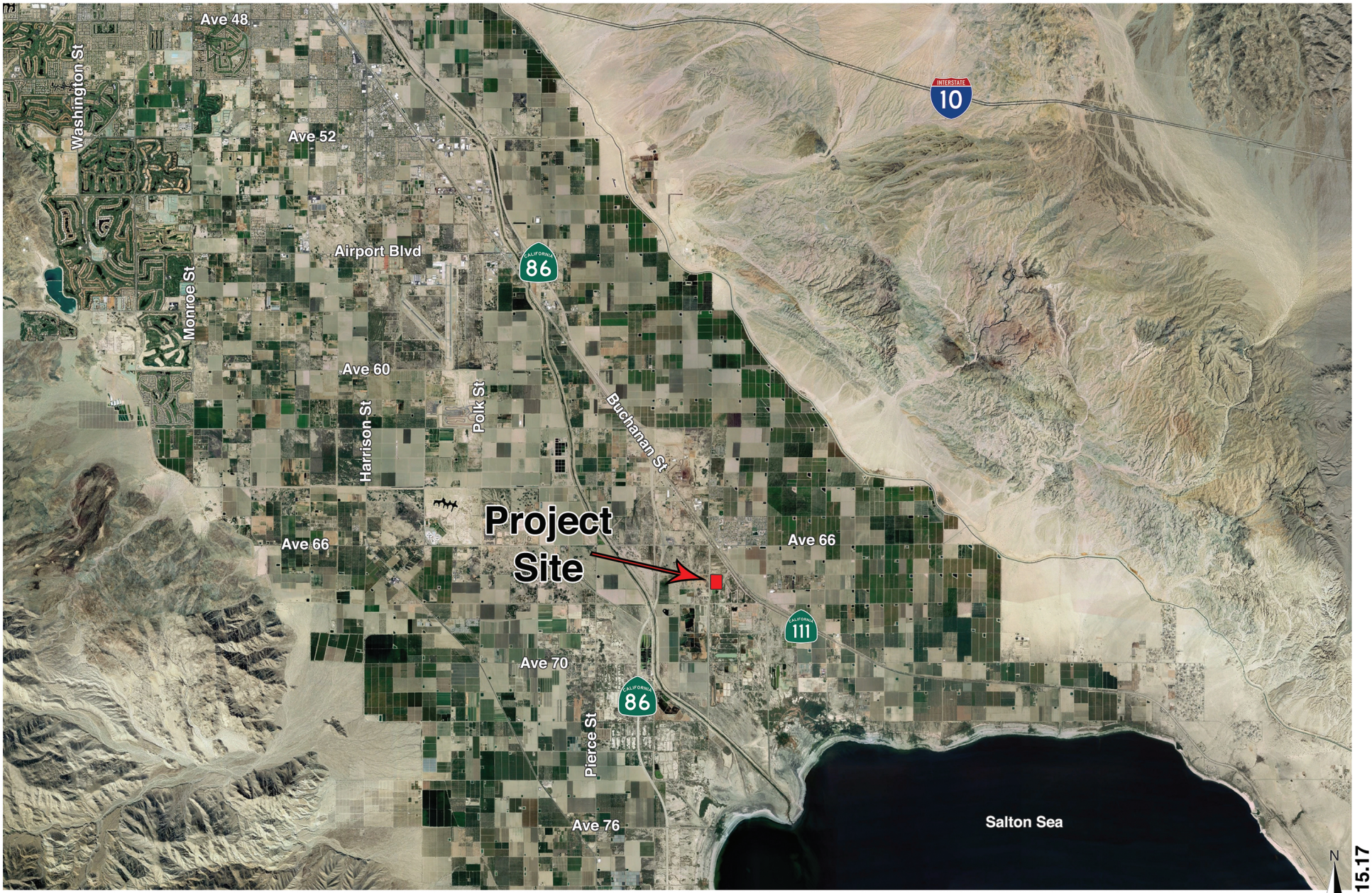
02.15.17

TERRA NOVA®
PLANNING & RESEARCH, INC.

St. Anthony On-site Sewer and Water Distribution System
Regional Location Map
Mecca, California

Exhibit

1



Source: Google Earth, 2017

TERRA NOVA®
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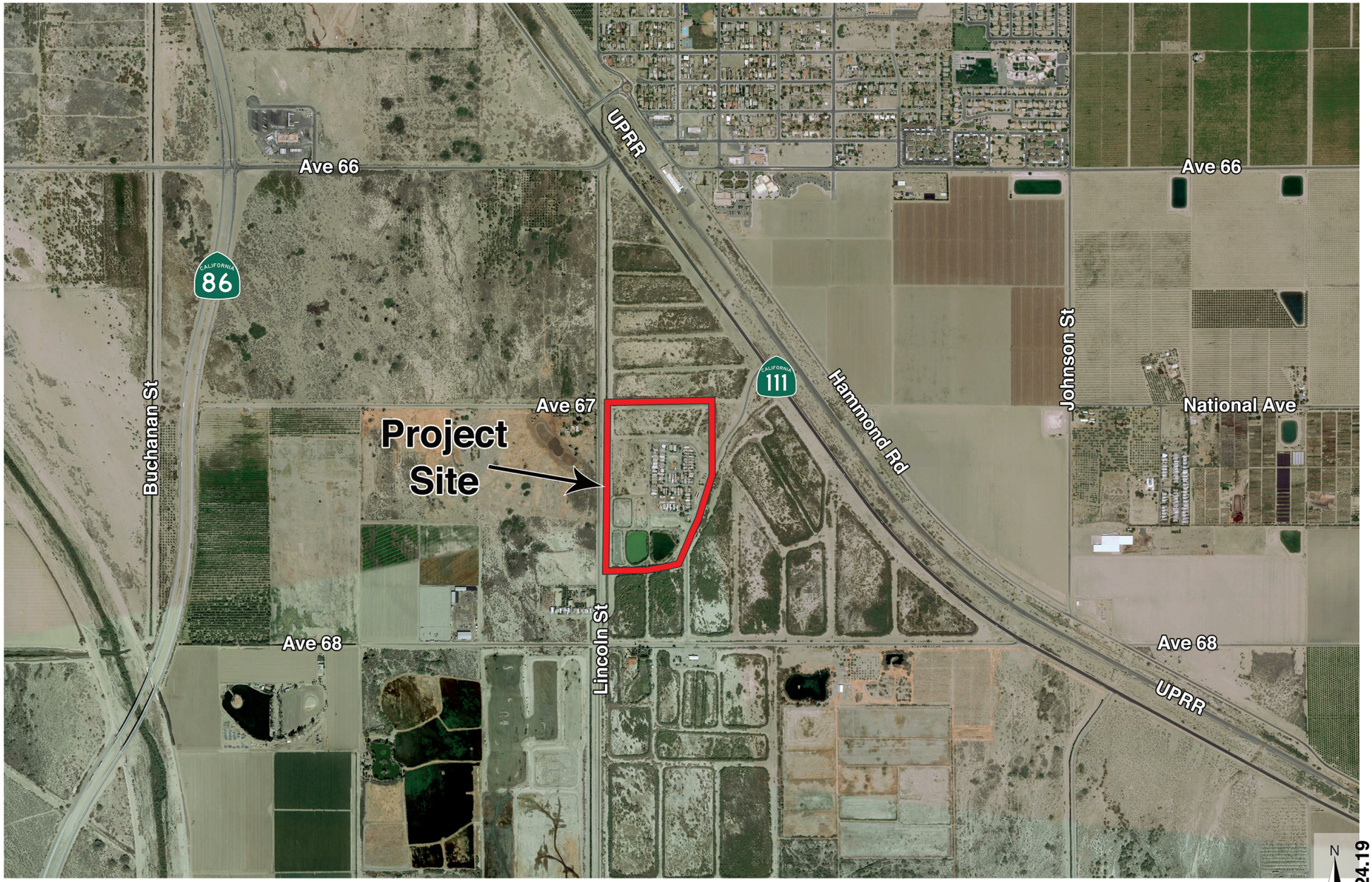
St. Anthony On-site Sewer and Water Distribution System
Vicinity Map
Mecca, California

Exhibit
3

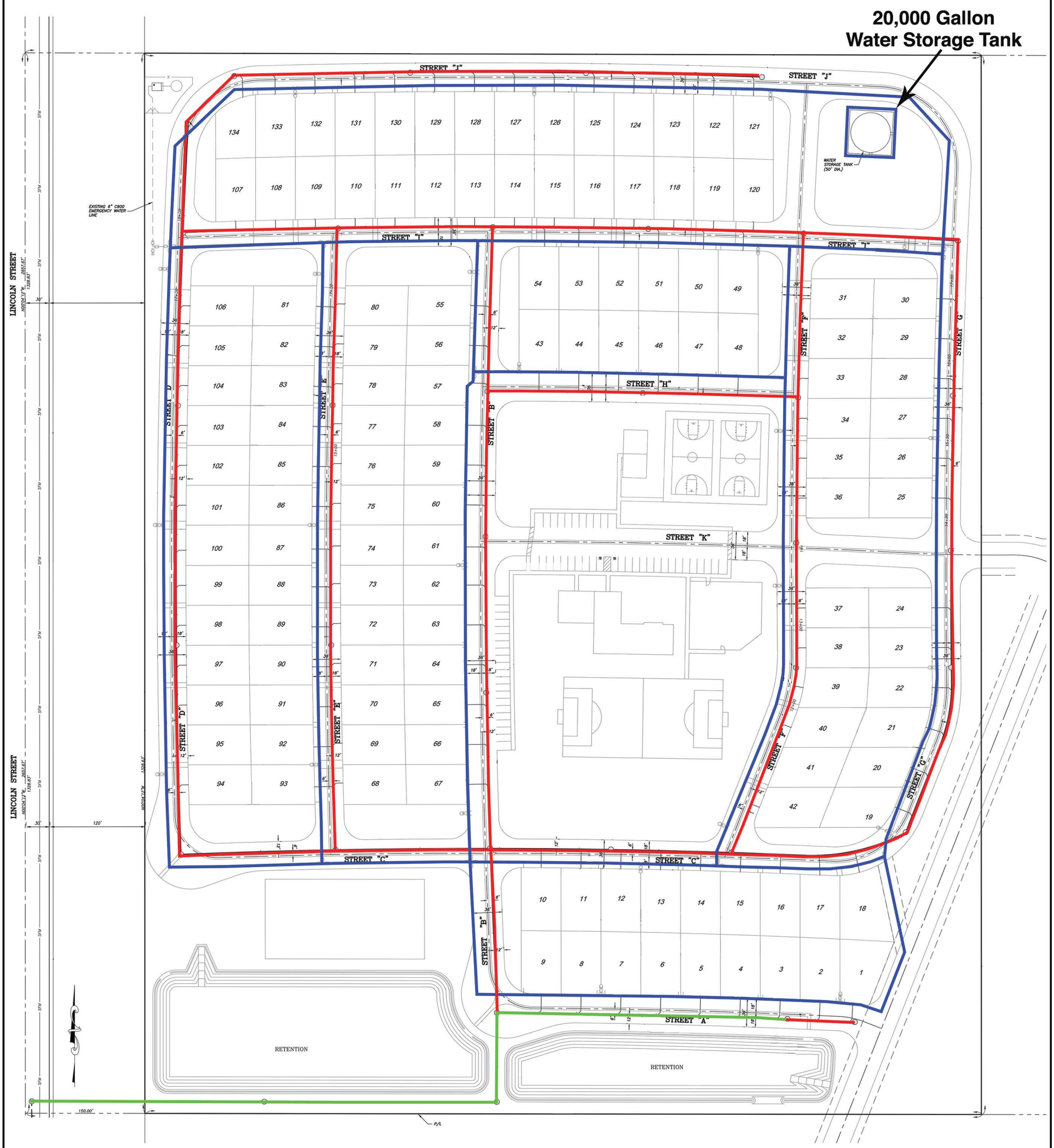


Source: Google Earth, 2017

TERRA NOVA®
PLANNING & RESEARCH, INC.

St. Anthony On-site Sewer and Water Distribution System
Project Location Map
Mecca, California

Exhibit
3



LEGEND

- Existing 10” Sewer Main
- Proposed 8” Sewer Main
- Proposed 6” Water Main

N

01.27.20

Source: Coachella Valley Engineers, 2018

TERRA NOVA®
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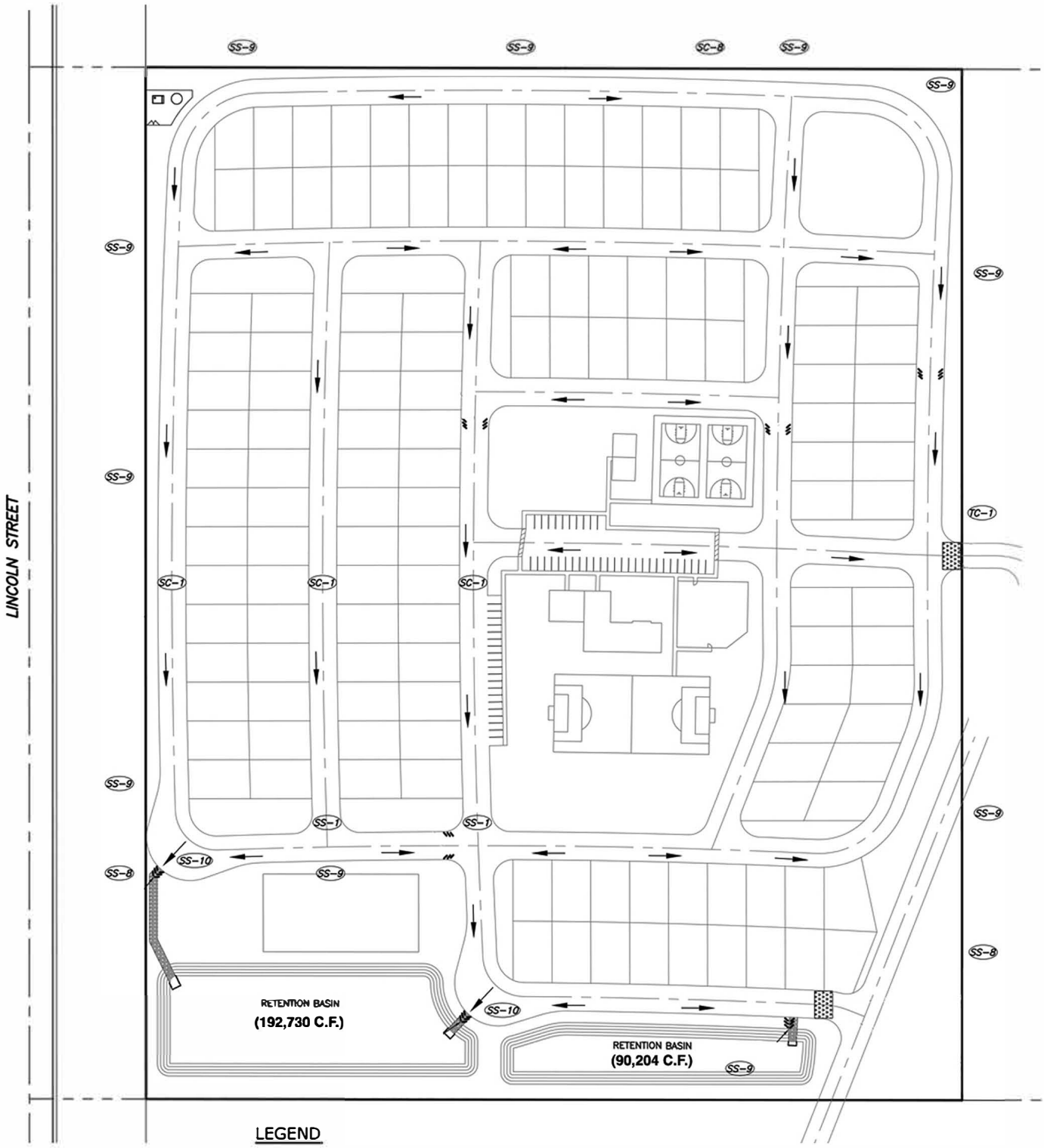
St. Anthony On-Site Sewer and Water Distribution System
Site Plan
Mecca, California

Exhibit
4



LEGEND

SC-1	SILT FENCE
SC-2	SEDIMENT/DESILTING BASIN
SC-5	FIBER ROLLS
SC-8	SANDBAG BARRIER
SS-9	EARTH DIKES/DRAINAGE SWALES
SS-10	OUTLET PROTECTION/VELOCITY DISSIPATION DEVICES
TC-1	STABILIZED CONSTRUCTION ENTRANCE/EXIT

GRAPHIC SCALE

100 0 50 100 200 300

(IN FEET)

N

03.05.19

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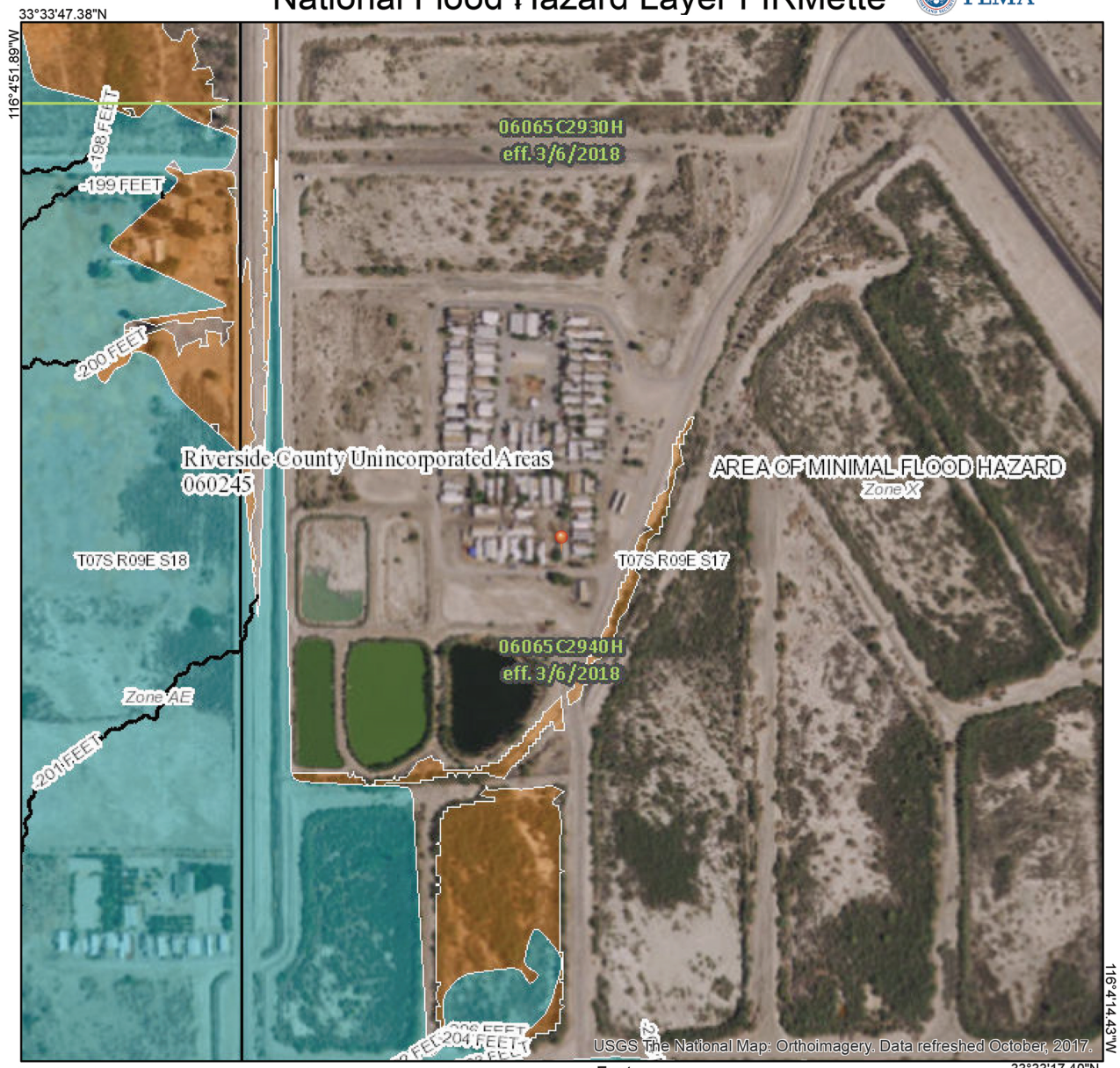
St. Anthony On-site Sewer and Water Distribution System
Stormwater Retention and Onsite Flows
Mecca, California

Exhibit

5

National Flood Hazard Layer FIRMette

FEMA



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS
- Without Base Flood Elevation (BFE) *Zone A, V, A99*
- With BFE or Depth *Zone AE, AO, AH, VE, AR*
- Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD
- 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile *Zone X*
- Future Conditions 1% Annual Chance Flood Hazard *Zone X*
- Area with Reduced Flood Risk due to Levee. See Notes. *Zone X*
- Area with Flood Risk due to Levee *Zone D*

OTHER AREAS
- NO SCREEN — Area of Minimal Flood Hazard *Zone X*
- Effective LOMRs
- Area of Undetermined Flood Hazard *Zone D*

GENERAL STRUCTURES
- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

OTHER FEATURES
- 20.2 — Cross Sections with 1% Annual Chance
- 17.5 — Water Surface Elevation
- Coastal Transect
- 513 — Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature

MAP PANELS
- Digital Data Available
- No Digital Data Available
- Unmapped

N

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 3/5/2019 at 1:47:42 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

N

03.05.19

Source: FEMA.gov, 2019

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St. Anthony On-site Sewer and Water Distribution System
FEMA Flood Plain Map
Mecca, California

Exhibit

6

Environmental Factors Potentially Affected:

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

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

CHAPTER 2: ENVIRONMENTAL ANALYSIS AND DETERMINATION

DETERMINATION: The State Water Resources Control Board finds

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

■ I find that although the proposed project could have a significant effect on the environment there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Bridget Binning

Digitally signed by Bridget Binning
Date: 2020.04.15 07:51:54 -07'00'

Bridget Binning, Sr. Environmental Scientist
State Water Resources Control Board

Date

PURPOSE OF THIS INITIAL STUDY

This Initial Study has been prepared consistent with CEQA Guidelines Section 15063, to determine if the Project, as proposed, may have a significant effect upon the environment. Based upon the findings contained within this report, the Initial Study will be used in support of the preparation of a Mitigated Negative Declaration.

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analysis Used. Identify and state where they are available for review.
    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures, which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:
    a) The significance criteria or threshold, if any, used to evaluate each question; and
    b) The mitigation measure identified, if any, to reduce the impacts to less than significant.

I. AESTHETICS Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

Setting

The Project area is located in the Coachella Valley, a gently sloping desert valley between the Little San Bernardino and Santa Rosa and San Jacinto Mountain Ranges. To the east the Mecca and Indio Hills border the valley. The Little San Bernardino, Santa Rosa, San Jacinto Mountains, as well as Mecca and Indio hills have a significant rise over the valley floor. The Project area generally has views of the Santa Rosa, San Jacinto, Little San Bernardino Mountains to the west, and Mecca and Indio Hills to the east. Implementation of the Project is expected to have a less than significant impact on aesthetic resources. The potential impacts to aesthetic resources are described in detail in the following discussion.

Discussion of Impacts

a) **Less Than Significant Impact.** The Project area is located approximately 3.21 miles west of the Little San Bernardino Mountains and approximately six miles east of the foothills of the Santa Rosa Mountain on the valley floor in the Community of Mecca. The Little San Bernardino and Santa Rosa Mountains, as well as the San Jacinto Mountains to the northwest, are considered scenic vistas for much of the Coachella Valley, including the community of Mecca.

From the PUCDC property, scenic views of the Little San Bernardino Mountains are to the north, east, and southeast, and Santa Rosa and San Jacinto Mountains to the west, northwest, and southwest. Currently, the Project area is partially occupied by the Saint Anthony MHP, evaporation ponds, sparse vegetation, and dirt roads. Vacant lands and mobile homes, consistent with the surrounding development in the area in scale and height, are in proximity of the site. Views of the lower elevations of the mountains are blocked by intervening development; however, middle and upper elevations of the mountains are visible above these structures.

Construction of the Project will include excavation, trenching, sewer and water line installation, grading, concrete pours, and paving. The Project will also include the construction of a 50-foot diameter by 18-foot tall water storage tank with a capacity of 20,000 gallons. This is the only major structure that is a part of this Project and will be located in the northeast corner of the site (please see Exhibit 4). Mobile home lots are oriented away from the water storage tank, which is also located approximately 1,100 feet from Lincoln Street on the west and 850 feet from Highway 111 and will not have a significant impact on visual resources that can be viewed from these public roads. The sewer and water lines will be buried underground, removed from view and will have no visual impacts on the surrounding properties.

Temporary visual impacts will include the presence of construction equipment and personnel, the movement of construction vehicles on area roadways and at vehicle staging areas, vehicle safety barriers, and material stockpiling. However, these activities will be temporary, and they will end once construction is complete. Therefore, less than significant impact is anticipated.

Overall, although there will be some impact from the Project on short-range views to the surrounding properties in proximity to the water storage tank, impact to views of scenic vistas from the proposed Project will be less than significant.

b) **No Impact.** The Project area is not located within a state scenic highway or locally designated scenic corridor. It does not contain scenic resources such as rock outcroppings or trees. Therefore, there will be no impact to scenic resources.

c) **Less than Significant Impact.** The Project area is currently partially occupied by the MHP; however, the site will be fully developed with 134 mobile home units and amenities upon completion of the Project. The proposed Project is necessary to support the future expanded and improved MHP. The Project will have a less than significant impact to the existing public views, visual character and quality of the site.

d) **No Impact.** No new sources of light and/or glare are proposed as part of the Project. Therefore, nighttime views will not be affected by the Project. No impact is anticipated.

Mitigation Measures
None required.

Sources: "County of Riverside General Plan, Eastern Coachella Valley Area Plan," 2012; Terra Nova Site Visits; Google Earth Pro (7.1.5.1557), accessed January 2017; "California Scenic Highway Mapping System," accessed January 2017.

II. AGRICULTURAL RESOURCES In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Setting:

The Project area is located within the eastern Coachella Valley. The Project area is designated as "Other Land" on the Riverside County Important Farmland Map 2010 (Sheet 1 of 3) and is defined as, a land which is not included in any other mapping category. Small portions of the Project area are designated as "Urban and Built-Up Land" which is defined as lands "occupied by structures with a building density of at least 1 unit to 1.5 acres." The Project area is not located immediately adjacent to any actively cultivated farmland and lies in an area where on-going irrigation has raised salt levels in the soil to a significant extent making productive agriculture more difficult. None of the Project area or surrounding lands is under a Williamson Act Contract.

Discussion of Impacts

a-e) **No Impact.** According to mapping provided by the Department of Conservation, Riverside County Important Farmland Map, the proposed Project area is designated as "Other Land" and "Urban and Built-Up Land." The Project area is not in agricultural use nor is it designated for agricultural use.

The Project includes construction of sewer, water and stormwater infrastructure. The proposed Project will not encroach onto lands used for agriculture nor will it induce the conversion of any agricultural lands to non-agricultural use. Therefore, the Project will not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) into non-farmlands and will not conflict with existing zoning for agricultural use, or a Williamson Act Contract. Aforementioned, the Project area is not zoned or designated, as farmland thus there will be no conversion of farmland to non-agricultural uses. No impact is anticipated.

Mitigation Measures
None required.

Sources: "Riverside County Important Farmland 2010 Map," sheet 1 of 3, California Department of Conservation, published January 2012.

III. AIR QUALITY Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Setting

The Project area is located in the Salton Sea Air Basin (SSAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). All development within the SSAB is subject to SCAQMD's 2016 Air Quality Management Plan (2016 AQMP) and the 2003 Coachella Valley PM_{10} State Implementation Plan (2003 CV PM_{10} SIP). The SCAQMD operates and maintains regional air quality monitoring stations at numerous locations throughout its jurisdiction. The Project area is located within Source Receptor Area (SRA) 30, which includes monitoring stations in Palm Springs, Indio, and Mecca.

Criteria air pollutants are contaminants for which the state and federal air quality standards have been established. Air quality in the Salton Sea Air Basin exceeds state and federal standards for fugitive dust (PM_{10}) and ozone (O_3). Ambient air quality in the SSAB, including the Project area, does not exceed state and federal standards for carbon monoxide, nitrogen dioxides, sulfur dioxide, lead, sulfates, hydrogen sulfide, or Vinyl Chloride. The following table shows the SSAB's state and federal attainment status for criteria pollutants.

Table 1
Salton Sea Air Basin Designation Status

Criteria Pollutants	Federal Designation	State Designation
Ozone – 8-hour standard	Nonattainment (Severe-15)	Nonattainment
Carbon Monoxide	Attainment	Attainment
Nitrogen Dioxide	Attainment	Attainment
Sulfur Dioxide	Attainment	Attainment
PM_{10}	Nonattainment (Serious)	Nonattainment
$PM_{2.5}$	Attainment	Attainment
ROG/VOC	Attainment	Attainment
Lead	Attainment	Attainment
Sulfur Dioxide	Attainment	Attainment
Source: U.S. EPA Green Book last updated December 2018, accessed January 2019.		

a) **No Impact.** The Project is located near the unincorporated community of Mecca in Riverside County, California. Riverside County is subject to the provisions of the 2016 SCAQMD Air Quality Management Plan, which describes the SCAQMD's plan to achieve state and federal air quality standards set forth in State and Federal Clean Air Acts.

The Project area is located in the SSAB and is subject to the rules and regulations imposed by the SCAQMD, including Rule 403-1, which governs fugitive dust emissions from construction and other anthropogenic sources within the Coachella Valley.

The Project is consistent with the goals and policies of the Riverside County General Plan Land Use Element for utilities. Additionally, the Project does not conflict with or obstruct implementation of the SCAQMD Air Quality Management Plan or the Coachella Valley PM_{10} State Implementation Plan. Therefore, the Project will not significantly impact air quality nor will it conflict with or obstruct implementation of local or regional air quality management planning.

b-c) **Less Than Significant Impact.** An impact is considered potentially significant if concentration of emissions exceeds the State or National Ambient Air Quality Standards. state and national air quality standards established for criteria pollutants are designed to protect that segment of the population that is most susceptible to respiratory distress or infection, including the elderly, children, asthmatics, or those who are weak from disease or illness. Table 2 shows the state and national ambient air quality standards.

Table 2
State and National Ambient Air Quality Standards

Pollutant	State Standards		National Standards	
	Avg. Time	Concentration	Avg. Time	Concentration
Ozone (O_3)	1-hour 8-hour	0.090 ppm 0.070 ppm	1-hour 8-hour	None 0.070 ppm
Carbon Monoxide (CO)	1-hour 8-hour	20.000 ppm 9.000 ppm	1-hour 8-hour	35.000 ppm 9.000 ppm
Nitrogen Dioxide (NO_2)	1-hour AAM	0.180 ppm 0.030 ppm	1-hour AAM	0.100 ppm 0.053 ppm

Table 2
State and National Ambient Air Quality Standards

Pollutant	State Standards		National Standards	
	Avg. Time	Concentration	Avg. Time	Concentration
Sulfur Dioxide (SO_2)	1-hour 24-hour AAM	0.250 ppm 0.040 ppm None	1-hour 24-hour AAM	0.075 ppm 0.140 ppm 0.030 ppm
Particulate Matter (PM_{10})	24-hour AAM	50.000 µg/m^3 20.000 µg/m^3	24-hour AAM	150.000 µg/m^3 None
Particulate Matter ($PM_{2.5}$)	AAM 24-hour	12.000 µg/m^3 None	AAM 24-hour	12.000 µg/m^3 35.000 µg/m^3
Lead	30-day Avg.	1.500 µg/m^3	3-month Avg.	0.150 µg/m^3
Visibility Reducing Particles	8-hour	No standard	No Federal Standards	
Sulfates	24-hour	25.000µg/m^3		
Hydrogen Sulfide	1-hour	0.030 ppm		
Vinyl Chloride	24-hour	0.010 ppm		

Source: California Air Resources Board, last checked 1/3/19.
Notes: ppm = parts per million; ppb= parts per billion; µg/ m^3 = micrograms per cubic meter of air;
AAM = Annual Arithmetic Mean.

The two primary pollutants of concern in the Coachella Valley, including the Project area, are ozone (O_3) and particulate matter (PM_{10}). The SCAQMD operates and maintains three air quality monitoring stations within SRA 30 (Coachella Valley). SRA 30 includes the Indio and Palm Springs monitoring stations, which have been operational since 1985 and 1987, respectively. The Mecca monitoring station has been in operation since 2013, however monitoring data has not yet been released

Ozone (O_3) is formed when byproducts of combustion react in the presence of ultraviolet sunlight. This process occurs in the atmosphere where oxides of nitrogen combine with reactive organic gases, such as hydrocarbons, in the presence of sunlight. Ozone is a pungent, colorless, toxic gas, and a common component of photochemical smog. Although also produced within the Coachella Valley, most ozone pollutants affecting the Valley are transported by coastal air mass from the Los Angeles and Riverside/San Bernardino air basins, thereby contributing to occasionally high local ozone concentrations. The Coachella Valley has a history of exceeding regulatory ozone standards, although the number of days and months the Federal one-hour standard is exceeded has dropped steadily over the past decade.

Table 3 below shows that the Palm Springs monitoring station exceeds the 1-hour and 8-hour federal and state ozone standards more frequently than the Indio site. This exceedance is attributable to the Palm Springs station's location closer to the San Gorgonio Pass, where ozone is transported into the SSAB from air basins to the west.

Table 3
Ozone Monitoring Data for the Coachella Valley

Monitoring Station	Year	Max. Concentration		No. Days Standard Exceeded		
				Federal[1]	State[2]	
		1 Hour ppm	8 Hour ppm	8 Hour	1 Hour	8 Hour
Palm Springs	2010	0.114	0.099	76	20	78
	2011	0.124	0.098	66	21	69
	2012	0.126	0.100	76	17	79
	2013	0.113	0.104	76	10	82
	2014	0.108	0.093	55	9	61
	2015	0.102	0.092	47	3	51
	2016	0.103	0.092	46	6	48
	2017	0.113	0.097	57	18	63
	2018	0.111	0.099	56	11	58
Indio	2010	0.100	0.087	45	6	45
	2011	0.099	0.090	40	3	42
	2012	0.102	0.089	43	2	45
	2013	0.105	0.087	35	2	38
	2014	0.095	0.091	24	2	30
	2015	0.093	0.085	11	0	12
	2016	0.099	0.089	27	3	29
	2017	0.107	0.093	44	8	47
	2018	0.106	0.091	49	4	52

Source: ARB Annual Air Quality Data Tables. http://www.arb.ca.gov/adam/, accessed September 2019.
1 = > 0.070 parts per million for the 8 hour standard.
2 = > 0.090 and 0.070 parts per million in 1 hour and 8 hour, respectively.

Particulate Matter PM_{10} consists of fine suspended particles of ten microns in diameter, and are the byproducts of road dust, sand, diesel soot, windstorms, and the abrasion of tires and brakes. The elderly, children and adults with pre-existing respiratory or cardiovascular disease are most susceptible to the effects of Particulate Matter. Elevated PM_{10} levels are also associated with an increase in mortality rates, respiratory infections, occurrences and severity of asthma attacks and hospital admissions. The SSAB is a serious-nonattainment area for PM_{10}.

The SCAQMD, in conjunction with the Coachella Valley Association of Governments (CVAG), Riverside County and local jurisdictions, prepared the "2003 Coachella Valley PM_{10} State Implementation Plan," which includes PM_{10} control program enhancements and requests an extension of the region's PM_{10} attainment date. The Coachella Valley is designated as a serious non-attainment area for PM_{10} and is subject to the 2003 State Implementation Plan (SIP) and local dust control regulations and guidelines.

The table below shows that the National 24-hour standard for PM_{10} has been exceeded more frequently at the Indio station.

Table 4
PM_{10} Monitoring Data for the Coachella Valley

Monitoring Station	Year	Maximum Concentration (µg/m³/24 hours) **	No. Days Exceeding 24-hr. Standards		Annual Average (µg/m³)
			Federal[1]	State[2]	AAM[3]
Palm Springs	2010	144.8	0.0	0.0	19.4
	2011	396.9	2.0	0.0	21.7
	2012	143.4	0.0	0.0	19.9
	2013	185.8	1.0	13.1	23.1
	2014	313.8	1.1	*	25.4
	2015	199.0	1.0	*	20.9
	2016	447.2	1.1	*	23.1
	2017	105.6	0.0	*	22.1
	2018	422.3	2.0	0.0	22.9
Indio	2010	107.0	0.0	23.9	28.8
	2011	375.9	2.0	18.6	32.6
	2012	270.6	*	43.2	33.6
	2013	255.2	3.0	85.2	37.5
	2014	322.3	6.1	94.9	43.5
	2015	381.0	*	*	44.0
	2016	393.2	*	*	37.0
	2017	198.6	1.0	*	34.8
	2018	336.0	2.2	88.4	34.8
Mecca	2014	*	*	*	*
	2015	306.4	5.0	*	44.2
	2016	468.9	*	*	41.1
	2017	477.6	*	81.5	47.5
	2018	275.2	6.3	*	40.8

Source: Annual air quality site monitoring reports per ARB. http://www.arb.ca.gov/adam/, accessed September 2019.
[1] = > 150 µg/m³ in 24 hour period; [2] = > 50 µg/m³ in 24 hour period; [3] Federal Annual Average Standard AAM > 50µg/m³ revoked December 17, 2006. State standard is AAM > 20µg/m³
4 State Annual Average Standard = AGM > 20µg/m³
* There are insufficient (or no) data available to determine the value.
** Data may include exceptional events.

Air Quality Pollutant Emission Projections

Projected Construction Emissions

CalEEMod Version 2016.3.2 was used to estimate the potential emissions of criteria pollutants associated with construction of the proposed Project. For purposes of air quality modeling and analysis, the Project is assumed to be constructed within a 6-month period, beginning mid 2020 and ending late 2020. The Project's total area of disturbance is approximately 32 acres. The Project specific data provided by the Project engineers indicate that there will be a net import of approximately 41,468 cubic yards of materials.

Short-term emissions of air quality pollutants will occur during site preparation/grading and trenching for pipelines. Sources of construction-related emissions include the operation of construction equipment, soils/materials imports, as well as vehicles transporting workers to and from the Project site. Construction emissions were calculated based upon the daily use of various types of construction equipment to be used throughout the entire construction period. It should be noted that not all equipment will be used every day, and various construction activities generate different quantities of emissions.

CalEEMod output tables are provided in Appendix A. The Construction Emission summary below provides the projected maximum daily emissions for all construction activities. Construction-related air quality impacts are short-term and will occur only during the construction phase of the Project.

Table 5
St. Anthony On-site Sewer and Water Distribution System Project
Projected Construction Emissions
(lbs./day)

	CO	NO_x	ROG	SO_x	PM_{10}	$PM_{2.5}$
Maximum Emissions	30.90	80.85	5.49	0.14	9.63	6.12
SCAQMD Threshold	550.00	100.00	75.00	150.00	150.00	55.00
Significant	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod Version 2016.3.2 (output tables provided in Appendix A).
Average of summer and winter emissions, unmitigated, with the exception of PM10 and PM2.5, which show emissions after adherence to required dust control measures.

As shown in the table above, construction-related activities for the Project are projected to remain below established daily thresholds for all criteria pollutants. The Project construction related PM_{10} and $PM_{2.5}$ fugitive dust emissions are minimized through adherence to SCAQMD Rule 403, which requires the application of dust control plan and dust suppression techniques during all phases of construction. Therefore, the Project construction is not anticipated to violate state or federal air quality standards or contribute to existing air quality violation in the air basin.

Projected Operational Emissions

Operational air emissions impacts associated with the proposed Project will be negligible because it will not result in the development of habitable structures. Therefore, operational emissions will have less than significant impact to air quality.

Conclusion

As shown above, the Project will have less than significant impacts on air quality during both construction and operational phases. Also, results of this air quality analysis demonstrate that localized levels will not violate air quality standards, and therefore do no present a significant cumulative impact. Overall impacts to air quality from the Project construction and operation are, therefore, expected to be less than significant.

Minimization measure 3(b) has been set forth below to further reduce the Project's impacts to air quality.

d) **Less than Significant Impact.** To determine if the Project has the potential to generate significant adverse localized air quality impacts, the 5-acre mass rate Localized Significance Thresholds (LST) Look-Up Table for SRA 30 (Coachella Valley) was utilized. The nearest sensitive receptors to the Project is the 13-unit Huerta mobile home park located within 25 meters immediately west of Lincoln Street. Therefore, LSTs are summarized in the table below for sensitive receptors located approximately 25 meters from the emission source. the Project construction related emission estimates reflect all phases of construction, including grading and excavation. The Project construction phases will not all occur concurrently, such as grading and paving, therefore daily emissions will likely be lower than those calculated. As shown in the table below, LST thresholds will not be exceeded during construction of the Project.

Table 6
St. Anthony On-site Sewer and Water Distribution System Project
Localized Significance Thresholds
(lbs./day)

	CO	**NO_x**	***PM_{10}**	***$PM_{2.5}$**
Project Emissions	30.90	80.85	9.63	6.12
LST	2,292.00	304.00	14.00	8.00
Exceed?	**No**	**No**	**No**	**No**

Source: CalEEMod Version 2016.3.2 (output tables provided in Appendix A); Table C-1: 2006-2008 Thresholds for Construction and Operation, South Coast Air Quality Management District, revised October 21, 2009.
Emissions shown are the maximum daily emission during all phases of construction.
* PM10 and PM2.5 emission show mitigated conditions, including reductions from mandatory dust control plans.

e) **Less Than Significant Impact.** The Project is not expected to generate objectionable odors during any of the phases of construction or at project buildout. The Project has the potential to result in short-term odors associated with vehicle exhaust, which is expected to be minimal. In addition, any such odors will be quickly dispersed below detectable thresholds as distance from the construction site increases. All sewer and water pipelines will be located underground not exposing the surrounding area to near- or long-term odors. Therefore, impacts from objectionable odors are expected to be less than significant.

Minimization Measures 3(b):
While Project air emissions are projected to have a less than significant impact on air quality, the following measure will be applied:

Per SCAQMD Rule 403, a fugitive dust plan shall be prepared for the Project and shall be approved by the Project Engineer. Said plan shall include, but not be limited to, the following best management practices (BMPs):

- Chemically treat soil where activity will cease for at least four consecutive days;
- All construction grading operations and earth moving operations shall cease when winds exceed 25 miles per hour;

- Water both the site and equipment twice a day, morning and evening, as well as during all earth-moving operations;
- Operate street-sweepers on paved roads adjacent to site;
- Establish and strictly enforce limits of grading for each phase of development;
- Stabilize and re-vegetate areas of temporary disturbance needed to accomplish each phase of development;
- Wash off trucks as they leave the project site as necessary to control fugitive dust emissions;
- Cover all transported loads of soils, wet materials prior to transport, provide adequate freeboard (space from the top of the material to the top of the truck) to reduce PM_{10} and deposition of particulate matter during transportation;
- Use track-out reduction measures such as gravel pads at the Project's access points to minimize dust and mud deposits on roads affected by construction traffic.

Mitigation Measures: None required.

Sources: Project Improvement Plans; Air Quality Impact Analysis using CalEEMod Version 2016.3.2, prepared by Terra Nova Planning & Research, Inc. March 2017; "Air Quality Management Plan 2016," South Coast Air Quality Management District; "Coachella Valley PM_{10} State Implementation Plan," 2003; "EPA Green Book Designated Non-Attainment Areas for All Criteria Pollutants," as of 2017; "Table C-1: 2006-2008 Thresholds for Construction and Operation," South Coast Air Quality Management District, revised October 21, 2009.

IV. BIOLOGICAL RESOURCES **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☒	☐
c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Setting

The Coachella Valley is located within the Sonoran Desert region, a subdivision of the Colorado Desert, which contains a wide range of significant biological resources. The biological resources are species of plants and animals that are highly specialized and endemic to the Coachella Valley. The central portion of the Coachella Valley is predominantly sand fields divided into three sub-communities: active sand dunes, active sand fields, and stabilized and partially stabilized desert sand fields.

Active sand dunes are located in exposed areas on the valley floor where high wind conditions convey sand and persistently shift the sand dunes, allowing for little to no vegetation. Active desert sand fields are located within the Coachella Valley Preserve adjacent to the dunes. Urban development within the valley (e.g. Union Pacific Railroad lines, Interstate 10 and associated windbreaks, upwind development, and the construction of roads) has isolated parts of the area from fresh sources of sand resulting in stabilized and partially stabilized sand fields. Stabilized and partially stabilized sand fields are areas on the valley floor with an accumulation of sand that is not in dune formation. Urban development has affected sand movement and the formation of sand fields and dunes due to the creation of barriers such as roads, buildings, and landscaping.

The Project site is part of the Coachella Valley Multiple Species Conservation Plan (CVMSHCP). Although the Project site is outside of any specific Conservation Area or other biologically sensitive area, the Project is potentially subject to fee mitigations for all covered CVMSHCP species that could be impacted. The CVMSHCP is a comprehensive regional plan that balances growth projected in the Coachella Valley with the requirements of federal and state endangered species laws. The CVMSHCP area includes approximately 1.2 million acres in the Coachella Valley and the surrounding mountains. It is comprised of a Reserve System consisting of 21 existing Conservation Areas and new additional conservation areas to provide habitat to protect 27 sensitive plant and animal species.

Discussion of Impacts

a) **Less Than Significant with Mitigation.** Wood Environment and Infrastructure Solutions, Inc (Wood E&I) prepared a "Biological Resource Assessment Report" for the Project area, including the ponds south of the site, in May 2019. This report provides an updated assessment to the 2015 and 2017 surveys and includes a literature review and field assessment of the site. The field assessment was conducted on April 17, 2019. Results of the assessment are as follows:

Wildlife

Approximately 68 species of vertebrate animals were reported in the Project area in 2019, which included 1 amphibian, 2 reptiles, 63 birds, and 2 mammals. That inventory was limited by the seasonal timing and short duration of the survey period, and by the nocturnal and fossorial habits of many animals. Of the 68 species reported, 15 sensitive biological species have the potential to occur on-site, include 4 plants, 1 fish, 1 amphibian, 2 reptiles, 5 birds, and 2 mammals[1].

[1] Protective Status Acronyms: F= Federal, C=State, ND=Not Designated, END= Endangered, THR= Threatened, Candidate = State candidate for Federal listing, CSC=California Special Concern Species, BCC=Birds of Conservation Concern.

Sensitive Plants: There is a low potential for four sensitive plants Mecca-aster (*Xylorhiza cognata,* F: ND, C: ND), gravel milk-vetch (*Astragalus sabulonum,* F: ND, C: ND), Coachella Valley milk-vetch (*Astragalus lentiginosus var. coachellae,* F: END, C: ND), and slender cottonheads (*Nemacaulis denudata var. gracilis,* F: ND, C: ND) to occur on the Project area due to lack of habitat, incorrect elevational range, and unsuitable microhabitat characteristics. The Coachella Valley milk-vetch is a "covered species" under the Coachella Valley MSHCP and any possible impacts to this species would be mitigated through payment of the MSHCP fee. No other federally listed endangered or threatened species or listed critical habitat is reported on site.

Sensitive Fish: Desert pupfish (*Cyprinodon macularis,* F: END, C: END) has been documented in the agricultural drainage channels near the site but are highly unlikely in the ponds on the site. The ponds are not connected to the agricultural drainages.

Sensitive Amphibians: Couch's Spadefoot (*Scaphiopus couchii*, F: ND, C: ND) may occur on the site following substantial rain events (if pooled rainwater persists), but its relatively low protective status suggests that even if impacts occur, the impacts would not be considered significant.

Sensitive Reptiles: There is a low potential for two sensitive reptile species, the Coachella Valley fringe-toed lizard (*Uma inornate*, F: THR, C: END) and flat-tailed horned lizard (*Phrynosoma mcallii,* F: ND, C: Candidate) to occur in the project area. However, due to the lack of habitat and no recent records of the species being located within the Project area, Wood E&I believes that these species are now absent from the Project area.

Sensitive Birds: Five sensitive bird species that have low potential to occur on-site include: burrowing owl (*Athene cunicularia*, F: ND, C: CSC), prairie falcon (*Falco mexicanus*, F: ND, C: ND), loggerhead shrike (*Lanius ludovicianus*, F: ND, C: CSC), crissal thrasher (*Toxostoma crissale*, F: ND, C: CSC), and Le Conte's thrasher (*Toxostoma lecontei*, F: BCC, C: CSC). Crissal thrasher was the only species detected on-site and was only detected during the burrowing owl assessment conducted in 2014 and has not been detected since. It is likely that the species does not breed on the site but could breed in suitable habitat nearby.

Sensitive Mammals: No sensitive mammals were observed in the Project area. Only the Palm Springs round-tailed ground squirrel (*Xerospermophilus tereticaudus chlorus,* F: ND, C: CSC) has a very low potential to occur on or near the Project area. The Palm Springs round-tailed ground squirrel is not listed as Threatened or Endangered but is a covered species under the Coachella Valley MSHCP and is considered a CDFW CSC.

Federally Listed Endangered, Threatened Species or Listed Critical Habitat

Based on the resource assessment, Wood E&I determined that no federally listed endangered or threatened species, proposed endangered or threatened species, federally designated Critical Habitats, or state designated listed or sensitive species were observed.

Burrowing Owl and Migratory Bird Treaty Act (MBTA)

The Migratory Bird Treaty Act (MBTA) was signed by the U.S., Great Britain, Mexico, Japan, and the countries of the former Soviet Union to make it unlawful to pursue, capture, kill, or possess, or attempt to engage in any such conduct to any migratory bird, nest, or egg. The Secretary of the Interior can issue permits for incidental take of migratory bird species. As with the Endangered Species Act (ESA), the MBTA also allows the Secretary of the Interior to grant permits for the incidental take of these protected migratory bird species.

Although the burrowing owl is a covered species under the CVMSHCP, take of this species is subject to the MBTA. A pre-construction MBTA survey will be required if construction is to occur during breeding season (February 15 through September 1) to assure that this and other MBTA-protected species do not locate or nest on the site prior to development. (See Mitigation Measure BIO-1).

No burrowing owls were observed during the general biological surveys for potential owl burrows in 2019. In 2014 (for the 2015 burrowing owl report), twenty-one burrows or burrow clusters were mapped that appeared to be suitable for burrowing owl occupation. However, the vast majority of these were in the Lincoln Street agricultural drain. The agricultural drain has been dredged since 2014, and no burrows could be found in the drain during the burrow search conducted on October 21, 2015 or on April 17, 2019. Two holes caused by erosion were noted within berm roads on the Project area in 2019. Several other erosion features were observed, but all of these were rather open, and more like crevices than burrows. A few debris piles on the Project area contained pipes that were of sufficient size to accommodate burrowing owls, but these were in areas containing vegetation too dense to be considered suitable burrowing owl habitat. No burrowing owl sign (feathers, pellets, or whitewash) were found during the 2019 burrow search surveys. Based on the scarcity of burrows and lack of owl signs, Wood E&I determined that focused owl surveys for this Project were not necessary. CDFW concurrence with this determination was obtained through email correspondence with Karen Riesz of the CDFW Bermuda Dunes office (BRAR, p. 18).

Summary

Based on the results of the Biological Resource Assessment, it is determined that the Project will not have adverse effects on any federally listed endangered or threatened species, proposed endangered or threatened species, federally designated critical habitats, or state designated listed or sensitive species. Adherence to mitigation measures set forth in the MBTA (Mitigation Measure BIO-1) will ensure impacts to nesting birds will be less than significant.

b) **Less than Significant Impact.** The existing man-made sewage ponds located at the south end of the Project area contain riparian habitats populated with common plant and wildlife species. The decommissioning of the sewage ponds would result in the removal of a small portion of riparian habitat populated with common alkali vegetation and common wildlife. No sensitive natural communities identified by a state or federal wildlife service will be affected by the decommissioning of the sewage ponds. Therefore, impacts will be less than significant.

c) **No Impact.** The only potential jurisdictional resources on the site are the existing sewage ponds located at the south end of the Project area. These ponds have no hydrologic connectivity to any watercourses and do not receive runoff from the surrounding area. The decommissioning of the ponds and any other Project activities would not affect a state or federally protected wetland.

d) **No Impact.** The Project area is partially disturbed and covered with Indio very fine sandy loam – wet, and Salton silty clay loam – wet. The site is predominately covered with non-native species, which does not serve as habitat for migratory birds. The Project area is bound by Lincoln Street on the west, and vacant lands to the north and south. The eastern portion of the property is bounded by a dirt road, isolated from native habitat and the potential for a wildlife corridor. Therefore, the Project will not interfere with any established native resident or migratory wildlife corridors or impede the use of wildlife nursery sites.

e-f) **No Impact.** The proposed Project will not conflict with any local policies or ordinances protecting biological resources nor does it conflict with the provisions of the MSHCP, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

The Project area is located within the MSHCP planning area but is not located within a Conservation Area. The Project will not conflict with the MSHCP or its implementation. Construction will occur on lands that were developed for non-agricultural purposes by or prior to 1996 and will not be required to pay the MSHCP development impact fees.

Mitigation Measures

BIO-1 MBTA and Burrowing Owl

If the Project construction begins in nesting bird season (February 15 through September 1), a qualified biologist shall conduct a pre-construction nesting bird survey to determine if any nesting birds (including burrowing owl) are present within the Project area. This survey shall be initiated within 14 days before the start of construction. If no active bird nests or burrows are found by the qualified biologist, then construction may proceed. If an active bird nest or burrow is found by the qualified biologist, an avoidance buffer will be placed around the active nest location (100 feet for passerine birds and 150 feet for raptors). No construction activity shall occur within the avoidance buffer, including vegetation removal and vegetation trimming or grading, until the qualified biologist has determined that the nest is no longer active, or the young have fledged.

Sources: "Biological Resources Assessment for San Antonio del Desierto Mobile Home Park Expansion Project," Wood Environment & Infrastructure, May 2019; Burrowing Owl Pre-Construction Survey for PUCDC, December 2016; "Final Recirculated Coachella Valley Multiple Species Habitat Conservation Plan," September 2007; "County of Riverside Draft General Plan, Eastern Coachella Valley Area Plan," effective March 11, 2014.

V. CULTURAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in § 15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

Setting

The Project area is located north of the Salton Sea and within the eastern lakebed of Pleistocene Lake Cahuilla, a large intermittent lake created by periodic flooding of the Colorado River, the last high stand of which was in approximately 1600 AD. Its shorelines continually changed as the lake experienced episodic filling and evaporation. The natural lake attracted human settlement when it had plentiful resources. Settlement along the lakeshore in the Coachella Valley was particularly intensive, with evidence of large-scale, multi-seasonal occupation camps and village sites.

Cultural Resources Study

CRM TECH conducted a cultural resources study of the Project area in November 2015 and updated it in 2017. The study includes a records search of files at the Eastern Information Center (EIC) at the University of California-Riverside, a Sacred Lands File (SLF) search at the Native American Heritage Commission (NAHC), Native American outreach, and field inspection. An archaeological literature and records search was conducted at the EIC on October 8, 2015 and again in January 2017 with a one-mile and five-mile buffer around the Project area. The results of this search indicated that two previous cultural resource studies were completed within the Project area. No cultural resources are recorded in the Project Area.

On May 10, 2019, the State Water Board completed an addendum to the CRM TECH 2017 study which included additional pedestrian survey and tribal consultation pursuant to PRC, section 21081.3.1 and Section 106 of the National Historic Preservation Act. The addendum was necessary because the Project area had been expanded by the addition of two sanitation ponds located south of the MHP. A State Water Board archaeologist surveyed the areas surrounding the active sanitation ponds, systematically examining the ground surface for any evidence of human activities dating to the prehistoric or historic period. Ground surface visibility was limited in heavily vegetated areas closest to the edges of the ponds. However, the roads and berms surrounding the

ponds had excellent visibility. The area has been subjected to heavy mechanical disturbance as the Project area was previously used for fish farming. No historical, archaeological, or tribal cultural resources were identified.

The potential for subsurface archaeological deposits was evaluated in the 2017 CRM TECH report. A records search with a five mile radius around the Project area was conducted and showed that the identified tribal cultural resources are located at higher elevations, in the Mecca Hills or foothills of the Santa Rosa mountains, along the Whitewater River, and along the former shorelines of Pleistocene and Holocene Lake Cahuilla. The Project footprint is located more than 1.5 miles east of the original course of the Whitewater River and roughly 160 feet below the last high stand shoreline of Holocene Lake Cahuilla, lower than the lowest known archaeological deposit at the Lake. The Project footprint would have been at the bottom of Holocene Lake Cahuilla and was unsuitable for habitation. Therefore, subsurface sediments within the vertical extent of the Project area do not have the potential for subsurface archaeological deposits. No impacts to archaeological resources are anticipated.

Archaeological survey and subsurface assessment did not identify the potential for archaeological artifacts or sites. Significant archaeological resources are unlikely to be present in the Project area, however, the following mitigation measures will ensure that any potential impacts would be reduced to less than significant levels.

Discussion of Impacts

a-b) **Less than Significant with Mitigation.** CRM TECH and the State Water Board conducted studies to identify historical, archaeological, and tribal cultural resources. The studies included a records search at the EIC, historical research, consultation with Native American representatives, and on-site field survey. The findings of both studies confirmed that no historical, archaeological, or tribal cultural resources are present on the surface within the Project area. In the unlikely case that archaeological resources are discovered during the Project construction, Mitigation Measure CUL-1 will reduce impacts to less than significant.

c)No Impact. No cemeteries or human remains are known to occur on-site. A portion of the Project area is currently developed, the entire area has previously been extensively disturbed. It is unlikely that human remains would be uncovered during Project construction. Should human remains be uncovered during excavation or grading of the area, California Health and Safety Code, section 7050.5 requires that all activity stop, that the County Coroner be notified. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she is required to notify the NAHC within 24 hours. In accordance with California Public Resources Code, section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. Compliance with state and federal law would ensure that **no impacts** occur to any human remains that may be discovered within the Project area.

Mitigation Measures

CUL-1 If a potentially significant archaeological resource is discovered that could be impacted by an activity, the applicant will cease work in the vicinity of the find and immediately notify the State Water Board, Division of Financial Assistance and implement the following measures.

- Determine if avoidance or preservation in place is feasible. Consistent with the California Environmental Quality Act Guidelines, section 15126.4(b)(3), avoidance or preservation may be accomplished through creating exclusion zones, developing procedures and guidelines for maintenance activities in archaeologically sensitive areas, planning construction to avoid the resource; or capping and covering the resource.
- If avoidance or preservation in place is not feasible and the resource is a tribal cultural resource, the State Water Board will consult with interested Tribes to determine appropriate mitigation alternatives that will both mitigate the archaeological value and the tribal cultural value of the site.

Sources: *Supplemental Historic Properties Identification report for the Pueblo Unido Community Development Corporation, St. Anthony's On-Site Sewer and Water Distribution System Projects (CWSRF No. 8006-110 & DWSRF No. 3301380-001C.* Prepared by the State Water Board, January 2020.

VI. ENERGY Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Setting

Electricity

The Project area is located within the Imperial Irrigation District (IID). The IID is California's sixth-largest electric utility, and its third-largest publicly owned utility. The IID began generating electricity in 1936, using small hydropower units it installed along its own system of irrigation canals and today it provides electricity and water to customers in Imperial County and parts of San Diego and Riverside Counties.

Natural Gas

Natural gas services in the Project area are provided by Southern California Gas Company (SoCal Gas). Natural gas supplies are transported from Texas to the Coachella Valley through three east-west trending gas lines, which cross the Valley near and parallel to Interstate-10 and continue west to Los Angeles. The pipelines include one 30-inch line and two 24-inch lines, with pressures of 2,000 pounds per square inch (psi).

Alternative Energy

The four primary forms of alternative energy used in the Coachella Valley include wind energy, solar energy, cogeneration, and hydrogen fuel cells. The Coachella Valley's renewable energy workforce is an essential aspect of its potential to develop these energy resources.

Discussion of Impacts

a, b) Less than Significant Impact. Construction related energy demand comes from the operation of construction equipment and the manufacturing of construction materials. The operation of the pipelines or stormwater retention will not require the use of any energy resources.

The Project will result in the installation of new underground sewer pipelines, water pipelines, and stormwater management. The Project will not interfere with any state or local plan that promotes renewable energy or energy efficiency. Adherence to the applicable state standards enforced by the County will ensure that the Project is consistent with current energy standards and conservation goals.

Mitigation Measures: None required.

VII. GEOLOGY AND SOILS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines & Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

VII. GEOLOGY AND SOILS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

Setting

The Coachella Valley is located in the northwestern portion of the Salton Trough, a tectonic depression roughly 130 miles long and 70 miles wide that extends from the San Gorgonio Pass to the Gulf of Mexico. The valley is bounded by the San Bernardino Mountains on the northwest, San Jacinto Mountains on the west, Santa Rosa Mountains on the south and southwest, and Little San Bernardino Mountains to the northeast. The Salton Sea is located approximately three miles to the south of the Project area.

The valley's geologic composition is directly related to its proximity to the San Andreas Fault, which passes through the northeasterly portion of the valley, as well as other active faults. The region is susceptible to a range of geologic hazards, including ground rupture, major ground shaking, liquefaction, slope instability, and collapsible and expansive soils. Episodic flooding of major regional and local drainages in the valley conveys sands and gravel from the surrounding mountains onto the valley floor. Strong sustained winds emanating predominantly from the San Gorgonio Pass cause winds that transport sand and dust down valley. Regional soils range from rocky outcrops within the mountains bordering the valley to coarse gravels of mountain canyons and recently laid fine- and medium-grained alluvial (stream deposited) and aeolian (wind deposited) sediments on the central valley floor. On-site soils are typical of those found in the southeastern margin of the valley, and are dry, finely granulated, sandy soils.

Discussion of Impacts

a.i) **No Impact.** The Project area is not located in an Alquist-Priolo Earthquake Fault Zone. The nearest earthquake fault (approx. 4± miles northeast) is a segment of the San Andreas Fault Zone, which is capable of generating a maximum probable quake of approximately 7.4. Other local faults within the San Andreas Fault Zone include the Eagle Canyon, Painted, and Platform Faults (Mecca Hills Fault Zone), which are capable of generating earthquakes of magnitude > 5.5. Fault rupture is not expected on the Project area.

a.ii) **Less Than Significant Impact.** The Project area is located in a seismically active region where earthquakes originating on local and regional seismic faults can produce severe ground shaking. Based on the earthquake potential analysis of the San Andreas Fault Zone, the site is located in an area where significant ground shaking will occur during a sizable earthquake. This intensity range (IX – XI) can result in partial or complete collapse of buildings, their foundations, and underground pipelines on and off site. However, to reduce impacts associated with ground shaking on people and buildings, the County implements the latest seismic safety design standards outlined in the 2013 edition of the California Building Code for Seismic Zone IV.

Proposed infrastructure may be subject to strong ground motion and shaking, and could sustain damage, including a break in the sewer or water lines, or a breach of the water storage tank, in the event of a major earthquake. However, discharge from a broken or damaged line or station would be limited, confined, and is not expected to have significant adverse impacts. Engineered design and motion-resistant and tank baffling construction methods will help minimize damage in the event of a strong earthquake.

a.iii) **Less Than Significant Impact.** The Project site is located in an area that has a high susceptibility to liquefaction (Riverside County General Plan; Figure 4.5-5). On-site underlying soils consist of Salton silty clay loam and Indio very fine sandy loam, wet, which are basically Quaternary alluvium (Ql/Qa) that are soft and expansive and could be susceptible to liquefaction. In addition, the depth to groundwater in the area is less than 50 feet below the ground surface. For liquefaction to occur, groundwater levels must be within 50 feet of the ground surface. Therefore, the soft Salton silty clay loam and Indio very fine sandy loam in this region are prone to liquefaction under building loads and severe ground shaking.

The Riverside County Building Department will require a site-specific soil analysis to address design loads with the submittal of grading and structure plans for the Project, including the planned water storage tank. These County requirements assure that project-related impacts associated with seismic related ground failure, including liquefaction, are less than significant.

a.iv) **No Impact.** The Project area lies on the Coachella Valley floor and is located away from landslide and rockfall hazard areas (Riverside County General Plan; Figure 4.5-6). The site consists of, and is surrounded by, relatively flat terrain; therefore, no impacts associated with landslides or rockfalls are anticipated.

b) **Less Than Significant Impact.** The Coachella Valley floor, including the Project area, is susceptible to wind erosion (Riverside County General Plan; Figure S-8). The Project will require removal and/or relocation of some of the existing mobile homes and incidental structures. Water and sewer lines will be installed within the MHP and the storage tank will be built on previously disturbed land. Associated site disturbance could result in the loss of some topsoil and generate suspended particulate matter. Construction is expected to require limited grading and primarily trenching for water and sewer lines. Standard dust control methods will be approved by Riverside County as a part of the project grading and building permits, which will ensure that soil erosion is avoided and minimized. Therefore, project-related soil erosion is expected to be less than significant.

The Project will be required to implement measures to control fugitive dust (see Air Quality, Section III), which will minimize potential adverse impacts associated with soil erosion. In addition, the Riverside County will require the implementation of BMPs associated with storm water flows in the Project area. These standard requirements, in the form of a Water Quality Management Plan, assure that erosion resulting from storm flows are controlled on and off site. Overall impacts associated with soil erosion and loss of topsoil will be less than significant.

c) **Less Than Significance Impact.** Surface soils consist of older lake and distal deposits (clay, silt, and fine-grained sand) (Riverside County General Plan Draft EIR 2015; Chapter 4). As described in Section VI-a.iv, above, the site has high susceptibility to liquefaction due to groundwater levels less than 50 feet below the ground surface. The site is also susceptible to lateral spreading, which is associated with the shallow water table. The site is not susceptible to landslides due to its relatively flat terrain and distance from mountainous slopes. Although tectonic subsidence has been documented in the Coachella Valley due to down-dropping of the geologic block between parallel strands of the San Andreas Fault, it is not known to occur in the Project area. Project-related impacts associated with unstable soils and down-dropping of the geologic block are less than significant.

d) **Less Than Significant Impact.** Expansive soils typically contain large amounts of clay that expand when wet and shrink when dry. As described in Section VI-a.iv, above, the site's underlying soils consist of Salton silty clay loam and Indio very fine sandy loam, Ql/Qa, which have a moderate-high shrink-swell potential ("Soil Survey of Riverside County, California, Coachella Valley Area," U.S. Dept. of Agriculture Soil Conservation Service, 1980).

Moderate-high shrink-swell potential would expose people and property to hazards such as liquefaction and ground failure. Therefore, proposed structures will be designed to minimize impacts associated with expansive soils and other potential geologic hazards. Conformance to the prevailing Uniform Building Code and the 2013 edition of the California Building Code for Seismic Zone IV will ensure that adverse impacts associated with expansive soils are less than significant.

e) **No Impact.** The Project proposes installation of the sewer and water lines, and storage tank, to serve existing and future mobile homes. Riverside County will require that this system be designed to local, regional and state health standards, which include appropriate soils, drainage and maintenance. The Project does not propose septic tanks and will connect the MHP to the CVWD sewerage collection and treatment system. Therefore, there will be no impact associated with soils and septic systems.

f) **No Impact.** The Project area is not known to contain unique paleontological or geologic features. The area is widely disturbed from past agricultural activities and infrastructure (drains), the existing MHP, and other disturbances. No adverse impacts to unique paleontological or geological resources resulting from the Project's development.

Mitigation Measures
None required.

Sources: "County of Riverside Draft General Plan, Eastern Coachella Valley Area Plan," effective March 11, 2014; County of Riverside Draft General Plan EIR, 2015.

VIII. GREENHOUSE GAS EMISSIONS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Setting

Air pollution is a chemical, physical or biological process that modifies the chemistry and other characteristics of the atmosphere. The primary contributor to air pollution is the burning of fossil fuels used in transportation, power and heat generation, and industrial processes. The byproducts from the combustion of fossil fuels can contain a number of air polluting substances. These emissions are responsible for the poor air quality that is evident in industrial centers worldwide. The associated increases in greenhouse gases (GHGs) has also contributed to a modification of the chemistry of the atmosphere increasing its ability to hold heat (especially infrared) and prevent its re-radiation back into space.

The generation of greenhouse gas emissions is produced by both moving and stationary sources, including motor vehicles, the production of electricity and natural gas, and other similar processes. Carbon dioxide is the primary greenhouse gas that has raised the most concern of atmospheric scientists due to current atmospheric levels, current and projected emission levels, and the highly correlated temperature regression curve that has been observed, predicting a future path of rising carbon dioxide levels.

The ARB has reported that 1990 GHG emissions totaled 427 million metric tons (MMT) for the state of California; ARB adopted a GHG scoping plan on December 11, 2008. The Scoping Plan includes a cap and trade program, green building strategies, recycling and waste reduction, and Voluntary Early Actions and Reductions. More recently, Governor Brown issued Executive Order B-30-15 on April 29, 2015 establishing a new California goal to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 ensuring the state will continue its efforts to reduce carbon pollution.

California Senate Bill (SB) 375 was signed by the Governor in September 2008 and is intended to at least in part implement greenhouse gas reduction targets set forth in AB 32. The SB 375 encourages regional land use planning to reduce vehicle miles traveled and requires jurisdictions to adopt a Sustainable Communities Strategy.

Discussion of Impacts

a-b) Less than Significant Impact. The Project will produce GHG emissions during the construction of the sewer and water lines and stormwater infrastructure. As stated in Section III, Air Quality, the CalEEMod model was utilized to quantify air quality emission projections, which include GHG emissions. Determinations of significance for construction-related and operational greenhouse gas emissions were based on the comparison of the Project-generated emissions to applicable SCAQMD thresholds.

On December 5, 2008, the SCAQMD formally adopted a greenhouse gas significance threshold of 10,000 MTCO2e/yr that only applies to stationary sources for industrial uses where SCAQMD is the lead agency (SCAQMD Resolution No. 08-35). This threshold was adopted based upon an October 2008 staff report and draft interim guidance document[2] that also recommended a threshold for all projects using a tiered approach. It was recommended by SCAQMD staff that a project's GHG emissions would be considered significant if it could not comply with at least one of the following "tiered" tests:

- Tier 1: Is there an applicable exemption?
- Tier 2: Is the project compliant with a greenhouse gas reduction plan that is, at a minimum, consistent with the goals of AB 32?
- Tier 3: Is the project below an absolute threshold (10,000 MTCO2e/yr for industrial projects; 3,000 MTCO2e/yr for residential and commercial projects)?
- Tier 4: Is the project below a (yet to be set) performance threshold?
- Tier 5: Would the project achieve a screening level with off-site mitigation?

Because the Project includes industrial-type sewer, water, and stormwater facilities, Project-related operational greenhouse gas emissions were compared to the SCAQMD Tier 3 threshold of 10,000 metric tons per year of $CO2_e$. The significance of construction-related GHG impacts are also based on the SCAQMD threshold of 10,000 metric tons per year of $CO2_e$, along with the Project's consistency with adopted state and local GHG reduction measures, including the use of equipment, fuels, and materials that are subject to current regulations of GHGs and equipment efficiency standards. Further, SCAQMD recommends that the Project construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures would address construction GHG emissions as part of the operational GHG reduction targets.

Table 7
GHG Emissions Summary
(Metric Tons/Year)

	CO2	CH4	N2O	CO2e
Construction Activities	455.35	0.08	0.00	457.47
Operation (Amortized 30-years)	9.86	0.00	0.00	25.14
SCAQMD Threshold (per year)				**10,000.00**
Significant Impact?				**No**

CalEEMod model, version 2016.3.2. Values shown represent the total annual, unmitigated GHG emission projections for construction of the Project.

[2] Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, prepared by SCAQMD, 2008.

All components of the Projects construction, including equipment, fuels, materials, and management practices, would be subject to current and future SCAQMD rules and regulations related to greenhouse gases. Applicable SCAQMD rules, include, but are not limited to, source specific standards that reduce the greenhouse gas content in engines and limit equipment idling durations. In addition, total Project construction GHG emissions would be well below the SCAQMD threshold of 10,000 metric tons of CO_2e per year for residential projects. Therefore, since construction-related and operational GHG emissions are below established SCAQMD thresholds, the GHG impact would be less than significant.

Mitigation Measures
None required.

Sources: Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, SCAQMD December 5, 2008; CalEEMod Version 2016.3.2.

XI. HAZARDS AND HAZARDOUS MATERIALS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Discussion of Impacts

a-b) **Less Than Significant Impact**. Impacts associated with the use, transport, or disposal of hazardous materials will be less than significant. Construction of the Project will involve the use of excavation, hauling and other construction equipment and vehicles that will use limited quantities of oil, fuel, and other potentially flammable or toxic substances. Minor maintenance and/or repair of equipment may be required and could result in fuel or oil spills if not properly managed. During the construction phase, contractors will be required to use an approved staging area for storing material and equipment and implement BMPs to assure that any spills are captured, limited and immediately and properly remediated. The project contractor will be required to adhere to applicable local, state, and federal laws pertaining to occupational safety and disposal of hazardous materials. No adverse long-term impacts associated with hazardous materials are anticipated.

c) **No Impact.** No schools are located within one-quarter mile of the Project area. The nearest school is Saul Martinez Elementary School located approximately 0.92 miles northwest of the Project area. There will be no hazardous materials-related impacts to schools.

d) **No Impact.** The Project area is not included on a list compiled pursuant to Government Code, section 65962.3. The Project will not create a significant hazard to the public or environment.

e) **No Impact.** The Jacqueline Cochran Regional Airport is located approximately 5.41 miles northwest of the Project area and is not located within the boundaries of the airports' land use compatibility plan. The site is not located in the vicinity of a private airstrip. The Project will not result in safety hazards for people living or working in the area.

f) **No Impact.** The Project is limited to sewer and water improvements, and will not alter the existing circulation pattern in the area (roadways, driveways, etc.) or adversely impact evacuation plans. The primary Project access point is from Highway 111 which is a developed two-lane roadway. The Project will not require further improvements to Highway 111. There will be no impacts associated with emergency access or response.

g) **No Impact.** The Project area is not located in a wildland fire hazard zone and is not susceptible to wildfires. Therefore, the Project will not expose people or structures to significant risks associated with wildfires. No related impact is expected.

Mitigation Measures
None required.

Sources: "County of Riverside Draft General Plan, Eastern Coachella Valley Area Plan," effective March 11, 2014; California Department of Toxic Substances Control Hazardous Waste, https://www.dtsc.ca.gov/HazardousWaste/ ; Accessed on 02.14.2017; State Water Resources Control Board, http://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=palm+desert; Accessed on 02.14.2017.

X. HYDROLOGY AND WATER QUALITY Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
(i) Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☐	☒
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐

X. HYDROLOGY AND WATER QUALITY Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Setting

The water quality of regional surface waters is largely dependent upon land uses that affect runoff, such as agriculture, urban development, and industrial land uses. Runoff from stormwater and agricultural irrigation can transport pollutants that collect on the ground surface and affect water quality of receiving streams, rivers, and channels. In the community of Thermal, which includes the community of Mecca and the Project area, the Coachella Valley Stormwater Channel is the major receiving water body which drains into the Salton Sea.

Discussion of Impacts

a, e) Less than Significant Impact. The Project is located in the Whitewater River watershed. All water providers in the watershed are required to comply with the Colorado River Basin Regional Water Quality Control Board standards for the protection of water quality, including the preparation of site-specific Water Quality Management Plans for surface waters.

The Project will not adversely impact the groundwater quality; rather it may serve to improve groundwater quality by decommissioning an existing on-site treatment system with ponds, to one that collects and transports wastewater to a regional wastewater treatment plant. The construction phase of the Project will require the use of water to facilitate soil consolidation and compaction and to minimize fugitive dust emissions. This will be done using BMPs to assure that groundwater is not contaminated. The Project contractor will ensure that adequate construction BMPs are implemented for the Project and satisfy local, state, and federal standards. Temporary construction BMPs considered and incorporated into the Project, as appropriate, would include:

- Soil stabilization (erosion control) techniques such as on-going site watering, soil binders, etc.;
- Sediment control methods such as detention basins, silt fences, and dust control;
- Contractor training programs;
- Material transfer practices;

- Waste management practices such as providing designated storage areas and containers for specific waste for regular collection;
- Concrete washout slurry shall be discharged and disposed of in an approved manner;
- Channel cleaning/tracking control practices;
- Vehicle and equipment cleaning and maintenance practices; and
- Fueling practices.

The Project will not violate any water quality standards or waste discharge requirements. The Project would not conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Implementation of BMPs would ensure impacts are less than significant.

b) **Less Than Significant Impact.** The Project area is located within the Thermal Subarea of the Whitewater River Sub-basin (Indio Sub-basin). The Thermal Subarea has a storage capacity of approximately 19.4 million acre-feet with an annual production of approximately 113,000 acre-feet[3].

During construction, the Project will require the limited, temporary use of water to facilitate soil consolidation and compaction, and to manage fugitive dust. An on-site water truck will address all construction water needs.

At buildout, the Project will not require additional water nor will it adversely affect groundwater recharge. The Project will result in construction of sewer, water and stormwater infrastructure that will serve the Saint Anthony MHP. The Project in and of itself will not generate a water demand, and the Saint Anthony MHP has already been approved by the County. Therefore, the Project will have a less than significant impact on groundwater supplies and recharge.

c) **Less than Significant Impact.** The Project area is generally flat and contains no rivers or streams. The Project will not increase impermeable surfaces on site, and therefore will not increase on-site storm flows.

A CVWD agricultural drain is located immediately west of the Project area, between it and Lincoln Street, which conveys agricultural runoff and sub-surface water to the Coachella Valley Stormwater Channel (CVSC) and ultimately the Salton Sea. The nearest "stream" is the CVSC located approximately 1.09 miles southwest of the Project area. Existing drainage patterns in the Project area are sheet flows generally to the south, with intervening obstructions to surface flows including Lincoln Street and Avenue 68 among others. The planned sewer and water lines will be subsurface, and the drainage pattern will not be disturbed or otherwise impacted by these facilities. On-site retention basins are designed to capture, and store stormwater flows on-site per Riverside County regulations.

[3] Engineers Report on Water Supply and Replenishment Assessment: East Whitewater River Subbasin Area of Benefit 2016-2017.

During construction of the Project, existing drainage patterns within the MHP may be temporarily altered to a limited extent by the removal and excavation of on-site soils. Impacts are anticipated to be less than significant.

c i) **Less than Significant Impact.** As previously discussed, the project contractor will ensure that adequate construction BMPs are implemented for the Project and satisfy local, state, and federal standards to reduce erosion and siltation on- and off-site. Impacts are anticipated to be less than significant.

c ii,iii) **No Impact.** The Project will not contribute to off-site storm water runoff or have a significant adverse effect on local or regional flood control capabilities or regional ground water quality or quantity. The Project includes the construction of an on-site underground sanitary sewer collection and domestic water distribution system, and storage tank. Per Riverside County regulations, stormwater runoff associated with the Project construction will be confined within the Project area by two retention basins with a storage capacity totaling approximately 284,484 CY. Stormwater flows captured on-site will percolate through a gravel filtration system to subsurface tile drains that will discharge the stormwater flows to the existing Lincoln Street agricultural drain. No impact is anticipated.

d) **Less Than Significant.** The Project site is not located in the vicinity of a body of water, geological formation, debris dam/basin or similar source of mud and debris that can produce a tsunami or generate a mudflow. The potential for seiching to occur is potentially associated with the planned 200,000-gallon storage tank. This potential is avoided and minimized by the requirements of the Uniform Building Code and California Building Code for Seismic Zone IV. There will be no significant impact and no mitigation is required.

Mitigation Measures
None required.

Sources: Flood Insurance Rate Map No. 06065C2930H, Federal Emergency Management Agency, 2018; "County of Riverside Draft General Plan, Eastern Coachella Valley Area Plan," effective March 11, 2014; Riverside County General Plan (2015); Engineers Report on Water Supply and Replenishment Assessment: East Whitewater River Subbasin Area of Benefit 2016-2017.

XI. LAND USE AND PLANNING Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Setting

The Project area is governed by the policies and land use designations of the Riverside County General Plan, including the Eastern Coachella Valley Area Plan, and County Zoning Ordinance. The Project area is designated an "AG (Agriculture; 1 du/10 ac. min.)" in the General Plan Land Use Map. The site is zoned W-2 (Controlled Development Areas), which permits MHPs with a Conditional Use Permit, which PUCDC has secured.

Discussion of Impacts

a) **No Impact.** Currently, the Project area is partially developed and occupied by several mobile homes. At buildout, the proposed sewer, water, and stormwater system will serve the site without physically dividing this or any other established community.

Temporary relocation of mobile homes within the MHP site will be required during construction. Once each phase of construction is completed, mobile homes will be incrementally moved to the improved sections of the MHP. The Project will not divide the on-site-established community.

b) **No Impact.** The Project occurs in an area designated for AG (Agriculture; 1 du/10 ac. min.) and zoned W-2 (Controlled Development Areas). The Project includes installation of on-site sewer and water system and will be consistent with the goals, policies, and programs of the Eastern Coachella Valley Area Plan of the Riverside County General Plan to serve the Project area. It does not violate the provisions or regulations of the County's Zoning Ordinance. No adverse impacts to land use are anticipated.

Mitigation Measures
None required.

Sources: "Biological Resources Assessment for St. Anthony Mobile Home Park Expansion Project," AMEC Environment & Infrastructure, October 2015; "Final Recirculated Coachella Valley Multiple Species Habitat Conservation Plan," September 2007; "County of Riverside Draft General Plan, Eastern Coachella Valley Area Plan," effective March 11, 2014.

XII. MINERAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Setting

Existing or potential mineral resources in the region include sand and gravel, clay, oil and gas, and geothermal. The Project area is designated as "AG (Agriculture; 1 du/10 ac. min.)" on the County's General Plan Land Use Map. Mineral resource extraction in the Coachella Valley is limited to sand and gravel, which the subject property cannot supply. No sand or gravel operations occur in the vicinity of the Project area.

Discussion of Impacts

a-b) **No Impact.** The Project area is located in an area designated for agricultural use (Eastern Coachella Valley Area Plan-Land Use Plan; Figure 3) and is partially occupied by mobile homes and fallow agricultural lands. The Project area is not known to contain important mineral resources, is designated as being within mineral resource zone MRZ-1 indicating that there are no significant mineral deposits. It should also be noted that the Project area is not available for mineral extraction operations. No project-related impacts to mineral resources are anticipated.

Mitigation Measures
None required.

Sources: Riverside County General Plan (2015); Eastern Coachella Valley Area Plan," effective March 11, 2014.

XIII. NOISE Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Setting

According to the United States Environmental Protection Agency (USEPA), the main sources of noise include road traffic, aircraft, railroads, construction, industry, noise in buildings, and consumer products (EPA Clean Air Act Title IV - Noise Pollution). In any city or county, the main sources of traffic noise are the motors and exhaust systems of autos, trucks, buses, and motorcycles (Noise and Its Effects; Administrative Conference of the United States).

Stationary noise sources include pool and spa equipment or heating, ventilating and conditioning (HVAC) units. Non-transportation-related noise can also come from the stationary operations of transport, such as railroad yards and truck depots used for loading and unloading. Temporary noise sources include landscape maintenance activities, home stereo systems, and barking dogs.

The County of Riverside has the authority to set land use noise standards and place restrictions on private activities that generate excessive or intrusive noise. Noise generators are subject to the County's noise ordinance.

The County of Riverside has established goals, policies, and programs to limit and reduce the effects of noise intrusion on sensitive land uses and to set acceptable noise levels for varying types of land uses.

Discussion of Impacts

a) Less Than Significant Impact. The principal noise source in the Project area is vehicular traffic on adjacent and nearby roadways (Hwy 111 and SR 195 (SR 111 and SR 195/Lincoln Street) and the lines of the Union Pacific Railroad located approximately 1,300 feet to the northeast. Other sensitive receptors near the Project area include the 13-units Huerta mobile home park located approximately 800 feet southwest.

According to Riverside County Ordinance No. 847, which sets standards for noise-generating activities, exterior sound levels for the surrounding residential lands are limited to 55 dB from 7am-10pm and 45 dB from 10pm-7am. In addition, this ordinance makes exceptions for construction and other temporary sources of noise.

Project-Generated Construction Noise
Site preparation, excavation and grading, and the installation of sewer and water lines, storage tank improvements will generate the loudest noise levels during Project construction. Even so, all construction noise will be intermittent and temporary, and contractors are required to abide by the Riverside County's noise standards, which exempt construction activities within the permitted time frames. Although these activities would result in high noise level than the 65 dBA that is the allowable noise level, the impacts will be short-term and temporary, and will occur during the least sensitive time of the day. As a result, these would be classified as less than significant levels.

Project-Generated Operational Noise
Once completed, post-construction noise levels will be substantially the same as those prior to Project construction. The water and sewer pipes will be subsurface and will not generate noise. The retention basins will generate no operational noise. Therefore, impacts will be less than significant and no exterior noise abatement measures will be necessary.

b) Less Than Significant Impact. Construction of the Project could produce temporary ground-borne vibration and/or ground-borne noise that may be felt by adjacent land uses. The primary source of ground-borne disturbances will be operation of heavy equipment during excavation and other construction. On-site soils are easy to work and neither rocky outcroppings or boulders are expected to be encountered during required site work. Any ground-borne impacts will be limited, temporary, and will end once construction is complete. Long-term operation of the Project is not expected to generate any noticeable ground-borne vibrations or noise, and impacts will be less than significant.

c) No Impact. The Project will not expose people residing or working in the Project area to excessive aircraft-related noise. The MHP property is outside of airport noise contours of the Jacqueline Cochran Regional Airport. The MHP property is not located in the vicinity of a private airstrip, and no impacts will occur.

Mitigation Measures
None required.

Sources: Riverside County General Plan (2015); Eastern Coachella Valley Area Plan," effective March 11, 2014.

XIV. POPULATION AND HOUSING Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

Setting

In 2018, the unincorporated areas of Riverside County had a total population of 385,953. The Project area is located in a rural, predominantly agricultural area. The area around the Project is comprised of vacant and fallow agricultural lands, mobile homes, Highway 111 and vacant desert lands. The unincorporated community of Mecca is located approximately one-half mile north of the MHP property. The Project will include construction of sewer lines, water lines, stormwater facilities, and a new water storage tank.

Discussion of Impacts

a) **No Impact.** The Project will construct on-site sewer and water system to serve the existing and future expansion of the St. Anthony MHP. The on-site sewer, water, and stormwater improvements will not induce substantial population growth in the area but rather will support the existing homes and buildout of the MHP. No growth-inducing impacts are anticipated.

b) **Less than Significant Impact.** Currently, the Project area is partially occupied by the mobile homes and abandoned agricultural ponds. During construction, on-site mobile houses and people would be temporarily relocated within the MHP to install the proposed sewer system. At buildout, the Project will better serve the on-site community with proper stormwater retention, connections to the community sewer system, and a safer and more reliable on-site water system that can also provide required fire flows. Less than significant impact is anticipated.

Mitigation Measures
None required.

Sources: Riverside County General Plan (2014); Eastern Coachella Valley Area Plan," effective March 11, 2014; Project materials.; "Profile of Unincorporated Riverside County," Southern California Association of Governments, May 2019.

XV. PUBLIC SERVICES	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the Services:				
a) Fire protection?	☐	☐	☐	☒
b) Police protection?	☐	☐	☐	☒
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

Setting

Fire Protection: The Riverside County Fire Department provides fire protection and emergency services in unincorporated Riverside County areas, including the Project area. The nearest fire station is Station 40, located approximately 0.53 miles northeast at 91350 Avenue 66 in Mecca. The MHP property is located within a 5-minute response time of this station.

Police Protection: The Riverside County Sheriff's Department provides law enforcement services in the Project area. The nearest police station to the Project is located approximately 6.8 miles to the northwest at 86625 Airport Boulevard in Thermal.

Schools: The Coachella Valley Unified School District provides public school services in the Project area. The nearest school to the Project area is Saul Martinez Elementary School located approximately 0.92 miles northwest.

Parks
Riverside County owns and maintains a wide range of parks and community facilities in the Project area. The nearest park to the Project area is Riverside County's Mecca Sports Complex with tennis courts, a large swimming pool and open space areas. The Project area is also served by the Coachella Valley Parks and Recreation District.

Discussion of Impacts

a) No Impact.

Fire Protection

The Project will not increase the demand for fire service in Riverside County because it will not induce any population growth in the region. Rather, the Project will provide water storage adequate to meet Riverside County's required fire flows, thereby significantly improving fire protection at the site. No impact is anticipated.

b) No Impact.

Police Protection

The proposed Project has a limited potential to attract theft of construction materials. However, standard site security and the fact that residents will remain on site during the construction period will ensure that any additional calls for police protective services will be minimal. No impact is anticipated.

c) No Impact.

Schools

The Project does not involve the construction of any residential or habitable structures that would increase the demand for school services or require the construction of a new school. No impact is anticipated.

d) No Impact.

Parks

The Project does not include any residential or habitat structures and will not induce population growth, that could affect demand for park facilities. The Project provides necessary utility improvements to support the mobile home park, which includes on-site recreational and open space amenities. Therefore, no impact is anticipated on the Riverside County's park and related facilities.

e) No Impact.

Other Public Facilities

No impact is anticipated on other public facilities.

Mitigation Measures

None required.

Sources: Riverside County General Plan (2014); Eastern Coachella Valley Area Plan," effective March 11, 2014.

XVI. RECREATION Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Setting

Within the Eastern Coachella Valley, there are traditional parks, school's parks, recreational facilities, additional recreational services, and trails. In the General Plan (2015), approximately 735 acres of land in the Eastern Coachella Valley is designated as "Open Space-Recreation." Riverside County owns and maintains a wide range of parks and community facilities in the Project area. The nearest park to the Project area is Riverside County's Mecca Sports Complex with tennis courts, a large swimming pool and open space areas. This facility is located approximately 0.75 miles north of the MHP property. The planning area is also served by the Coachella Valley Parks and Recreation District.

Discussion of Impacts

a-b) No Impact. The proposed Project would not directly or indirectly induce population growth that would increase the demand for recreational facilities or result in substantial physical deterioration of existing park facilities. No proposed facilities are located in proximity to an existing recreational resource. Additionally, impacts during the construction phase will be contained within the Project area and minimized through best management practice in order to limit and avoid potential annoyances related to air quality (See minimization measure 3(b)) and noise (Riverside County Ordinance No. 847). At buildout all facilities will be underground and will not induce any impact to recreational resources. It should also be noted that the development of this Project will include on-site recreational and open space amenities.

Mitigation Measures
None required.

Sources: Riverside County General Plan (2015); Eastern Coachella Valley Area Plan," effective March 11, 2014.

XVII. TRANSPORTATION/TRAFFIC Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☐	☒
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☒	☐

Setting

The Project area is located 0.25 miles north of the northeast corner of Lincoln Street and Avenue 68, and approximately 0.25 miles southwest from State Highway 111, in the unincorporated community of Mecca in Riverside County. During construction, the Project area will be accessed from Highway 111 and Avenue 68. The same streets will be used for emergency during construction.

The Project improvements include underground on-site sewer and water lines, stormwater facilities, and a new water storage tank. Once built, the Project will not generate any new traffic. For analysis purposes, traffic data from the 2014 update to the County of Riverside General Plan, Eastern Coachella Valley Area Plan, and Coachella Valley Association of Governments (CVAG) Active Transportation Plan (2016) were used to help analyze the potential impact on traffic in the Project area, and is discussed below. It is important to note that the Project traffic will be limited to construction crews, trucks and construction equipment, and material deliveries. These activities are expected to be most intensive during initial staging and site decommissioning following completion of construction.

Discussion of Impacts

a) **Less than Significant.** The Project area is currently partially developed and occupied by the mobile homes and relatively few trips are currently being generated by on-site uses. Access to the MHP property is currently from State Highway 111 and Avenue 68. Other nearby streets include Lincoln Street to the immediate west and Avenue 66 to the north, neither of which have ingress or egress access to the site. Traffic volumes on the segment of Lincoln Street within the Project area are very low, and connection to the in-street sewer

main will have a de minimis impact on this roadway and its level of service. The southerly MHP lateral will extend west under the existing agricultural drain to connect to the CVWD sewer main located in Lincoln Street. This is the only location where Project construction could affect the local roadway network.

Overall, due to the nature of the Project, there will be no impacts or conflict with an applicable transportation plan, ordinance, or policy to intersections, streets, highways, freeways, pedestrian and bicycle paths, and mass transit that may occur in the Project area. Impacts associated with this Project will be negligible and less than significant.

b) **No Impact.** The Project will not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) because the Project is neither a land use project nor a transportation project. The Project is considered an infrastructure improvement project that will not directly increase vehicle miles traveled in the area.

c) **No Impact.** Operation of the proposed sewer and water lines would not introduce design features or incompatible uses that would increase or create traffic hazards such as sharp curves or dangerous intersections. The proposed water and sewer infrastructure will be designed and installed in accordance with CVWD and Riverside County Health Department design standards and guidelines, and will not create a substantial increase in hazards due to a design feature. No impact is anticipated.

d) **Less than Significant Impact.** During construction, the construction crew would use existing roadways to access the Project area. In case of any emergency, existing surrounding roadways will be used to access the Project area, which would not be significantly encumbered by the Project activities.

The Project will result in the installation of on-site stormwater retention, sewer and water systems and will not require additional access points, including emergency access points. Once construction and installation activities are complete, area roads will continue to function at pre-project levels. Less than significant impact is anticipated.

Mitigation Measures
None required.

Sources: Riverside County General Plan (2015); Eastern Coachella Valley Area Plan," effective March 11, 2014; Coachella Valley Association of Governments (CAVG) Active Transportation Plan (2016).

XVIII. TRIBAL CULTURAL RESOURCES Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Setting

On April 25, 2019, the Project notification letters with invitations to consult on the Project were sent by certified mail to representatives of the two tribes on the State Water Board's AB 52 list for Riverside County: the Colorado River Indian Tribe (CRIT) and the Torres Martinez Desert Cahuilla Indians. The CRIT did not request consultation. The Torres Martinez Desert Cahuilla Indians requested consultation by telephone on May 9, 2019 and sent a formal written request by mail on June 6, 2019. The State Water Board contacted Michael Mirelez, the Tribe's Cultural Resource Coordinator, by phone and email on June 14, 2019 to coordinate the consultation and send a copy of the 2017 cultural resource report. A consultation meeting was scheduled for October 3, 2019 between the Torres-Martinez Desert Cahuilla Indians, and the State Water Board.

The Torres Martinez Desert Cahuilla Indians Cultural Resource Coordinator, Michael Mirelez, participated in the consultation meeting for the tribe. While no tribal cultural resources were identified in the Project footprint, Mr. Mirelez said the area is within the Tribe's Traditional Use Area and as such, is of high concern for the inadvertent discovery of archaeological materials, isolated burials, and cremations.

In addition to the AB 52 consultation, a NAHC Sacred Lands File (SLF) search was requested as part of the cultural resources report (see Section V). The SLF search was negative and the NAHC provided a list of 11 tribes affiliated with the Project area to be contacted regarding the presence of tribal cultural resources within the study area. Project notification letters with requests for

information about sites in the Project area were sent to the tribal representatives on October 27, 2015, and follow-up telephone solicitations were carried out on November 6-9th. A total of 19 individuals were contacted, representing the following 11 tribes: Augustine Band of Cahuilla Indians, Cabazon Band of Mission Indians, Cahuilla Band of Indians, Los Coyotes Band of Mission Indians, Morongo Band of Mission Indians, Ramona Band of Cahuilla, Santa Rosa Band of Cahuilla Indians, Soboba Band of Luiseño Indians, Soboba Band of Mission Indians, Torres Martinez Desert Cahuilla Indians, and Agua Caliente Band of Cahuilla Indians. No tribal or archaeological resources were identified as a result of outreach to Native American parties.

Discussion of Impacts

a-b) Less than Significant with Mitigation. As discussed in Section V, Cultural Resources, no historical resources listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code, section 5020.1(k) have been identified in the Project area. A search of the SLF did not identify any resources within the Project Area. None of the 19 Native American contacts identified tribal cultural resources within the Project Area.

A records search with an expanded five-mile radius around the Project area was conducted by CRM TECH in 2017 and showed that most of the identified tribal cultural resources are located at higher elevations, in the Mecca Hills or foothills of the Santa Rosa mountains, along the Whitewater River, and along the former shoreline of Lake Cahuilla. The Project footprint is located more than 1.5 miles east of the original course of the Whitewater River and roughly 160 feet below the last high stand shoreline of Lake Cahuilla and is lower than the lowest known archaeological deposit at the Lake. The Project footprint would have been at the bottom of Holocene Lake Cahuilla and was unsuitable for habitation. Therefore, subsurface sediments within the vertical extent of the Project area do not appear to have the potential for subsurface archaeological deposits. However, if unanticipated tribal cultural resources are found during the Projects construction, it could potentially cause a significant impact. To reduce potential impacts to tribal cultural resources discovered during the Projects construction, to less than significant levels, Mitigation Measure CUL-1 shall be implemented

Mitigation Measures
See Section V Mitigation Measure CUL-1

Sources: *Supplemental Historic Properties Identification report for the Pueblo Unido Community Development Corporation, St. Anthony's On-Site Sewer and Water Distribution System Projects (CWSRF No. 8006-110 & DWSRF No. 3301380-001C.* Prepared by the State Water Board, January 2020.

XIX. UTILITIES AND SERVICE SYSTEMS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Setting

Wastewater Treatment

The Project area will be served by CVWD for the collection and treatment of residential wastewater at CVWD's Wastewater Reclamation Plant (WRP)-4 at Fillmore Street and Avenue 63. CVWD has determined that WRP-4 has adequate capacity to treat wastewater from the existing and future residential units that will occupy the MHP property. The Project will not require the expansion of treatment capacity at this plant. CVWD implements all requirements of the Regional Water Quality Control Board pertaining to water quality and wastewater discharge.

Domestic Water

CVWD provides domestic water to the Project area. Its primary source of fresh water is groundwater extracted by deep wells from the Whitewater River sub-basin. The proposed MHP water infrastructure, storage tank and distribution lines, will be privately owned and operated, but will draw from the same aquifer utilized by CVWD. CVWD, as an urban water supplier, is required to prepare an "Urban Water Management Plan (UWMP)" every five years in response to the requirements of the Urban Water Management Planning Act (UWMP Act), California Water Code Sections 10610 through 10656. CVWD's UWMP is a planning tool that documents actions in support of long-term water resources planning and ensures adequate water supplies are available to meet all future urban water demands.

In addition to its UWMP, CVWD prepares an annual report each year to document and analyze the region's water needs and long-term demand for domestic water. This analysis includes conservation measures and replenishment programs to make it possible for CVWD and other groundwater users to meet increasing demand of the services area.

Storm Water Management

Stormwater drainage infrastructure within the Project area consists of a network of regional and local drainage systems, which convey surface runoff and agricultural tail water to the Coachella Valley Stormwater Channel and ultimately to the Salton Sea.

Solid Waste

Burrtec provides solid waste disposal, through a franchise agreement with the Riverside County, and will be responsible for collection and disposal of solid waste from the Project areas.

Discussion of Impacts

a) **No Impact.** The Project will result in the construction of new on-site sewer lines, water lines, stormwater retention basins and related facilities to serve the existing and planned expansion of the MHP.

The proposed sewage collection system will be connected to an existing gravity main in Lincoln Street that will convey effluent south to the new lift station at the northeast corner of Avenue 68 and Lincoln Street. The lift station will discharge into a force main that will convey sewerage north to CVWD's Wastewater Reclamation Plant (WRP) 4 at Fillmore Street and Avenue 63, which has adequate capacity to support the Project.

The proposed on-site water distribution system will consist of approximately 8,350 linear feet of 6" water main interconnecting the dwelling units to the CVWD system.

The two on-site retention facilities to be located at the southernmost portion of the site with a combined storage capacity of approximately 284,484 cubic yards (CY) (See Exhibit 5). The Project will also install subsurface tile drainage in accordance

with CVWD standards below the retention facilities with a gravel filtration system that allows stormwater to percolate into the groundwater basin. Stormwater will flow into the retention basins and percolate through the gravel filter and ultimately discharge shallow groundwater to the adjacent Lincoln Street agricultural drainage channel.

In summary, the Project will not require relocation or construction of additional water, wastewater, or stormwater facilities because the Project in and of itself is constructing such facilities. The Project will not require additional electric power, natural gas, or telecommunication facilities. No impacts are expected.

b) **Less Than Significant Impact.** Groundwater is the principal source of the Coachella Valley's domestic water supply. It is currently replenished via natural recharge and with Colorado River water conveyed to the valley via the Coachella Branch of the All-American Canal and the Colorado River Aqueduct. Local water resources are further supplemented with recycled/reclaimed wastewater. CVWD's UWMP indicates that it will have sufficient water supplies to serve the Coachella Valley population in year 2035. The region's water supplies are protected by a variety of water delivery entitlements and contracts. CVWD has committed sufficient capital resources and planned investments in various water programs and facilities to serve existing and future customers. Its UWMP and annual Engineers Reports detail water supply and demand, and provide information on groundwater recharge and replenishment activities, conservation, and water quality.

During construction, the Project will require the application of water for soil compaction and fugitive dust control. Project water demand will be limited and temporary, and the demand will end once construction is complete. The on-site stormwater facility is designed to allow for stormwater flows to percolate back into the groundwater basin, thus promoting basin replenishment. Overall, impacts to water supplies will be less than significant.

c) **Less Than Significant Impact.** The Project is made possible by the recent construction of sewer lines and a lift station in proximity to the MHP property. CVWD provides wastewater collection and treatment services in the Project area. The District has indicated that its WRP-4 facility has adequate treatment capacity to serve the MHP and to meet the District's existing commitments. There will be less than significant impact to wastewater treatment capacities associated with the Project.

d) **Less Than Significant Impact.** The proposed Project is expected to generate a very limited amount of solid waste that will be primarily associated with pipe and equipment packaging and associated materials. Much of this material will be recyclable and will be captured in the waste hauler's waste stream diversion program. Burrtec provides solid waste services to the Mecca District. The Coachella Valley Transfer Station currently receives an average of 328 tons of

waste per day and has a capacity of 1,100 tons of waste per day. Therefore, impacts to landfills will be limited and a one-time occurrence, and, will result in less than significant impacts to local landfill capacity.

e) **No Impact.** Burrtec is responsible for maintaining standards that assure that all waste is handled in a manner that meets local, state and federal standards. Project construction will not conflict with the standards and regulations. No impact is anticipated.

Mitigation Measures
None required.

Sources: Riverside County General Plan (2015); Eastern Coachella Valley Area Plan," effective March 11, 2014.

XX. WILDFIRE If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Setting

The Project area is located on the valley floor and is not in an area designated for being susceptible to wildfires according to the Riverside County General Plan (Figure S-11). The Project area does not contain forest land and is not in proximity to forest or timberland that would be subject to wildfires.

Discussion of Impacts

a-d) **No Impact.** According to the California Fire Hazard Severity Zone Map, the Project is not in an area susceptible to moderate, high, or very high fire hazards. The foothills of the San Bernardino and Santa Rosa mountains are the nearest fire hazard zones, located approximately 4 miles northeast and southwest of the Project area, and are designated as a "moderate" fire hazard severity zone. Due to the distance of the nearest fire hazard zone, the Project will have no impacts on wildfire risk.

Mitigation Measures: None required.
Sources: California Fire Wildland Hazard & Building Codes: California Fire Hazard Severity Zone Statewide Map.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE **Does the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

a) Less Than Significant Impact.

The Project is limited to the installation of stormwater infrastructure, water, sewer lines and a 20,000-gallon storage tank in the existing Saint Anthony MHP. A variety of resource surveys have been conducted on-site and, in the vicinity, which indicate that the Project will not have a significant adverse effect on these resources.

The Project does not have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

Biological Resources

The Project will not degrade the environment, the MHP property having been previously developed for agricultural and residential purposes. The Project area does not provide important habitat for any fish or wildlife species, plant or plant community. The Project will not reduce the number or restrict the range of a rare or endangered plant or animal. Impacts to biological resources will be less than significant.

Cultural Resources

As noted throughout this document and as shown on the accompanying exhibits, the MHP property has been in a disturbed state for several decades, being previously in agriculture and portions hosting the existing MHP in recent decades. On-site surveys have determined that there is a low probability of encountering archaeological resources, and there are no historic structures on this site. Therefore, the potential for impacts to sensitive cultural resources is less than significant.

b) **Less Than Significant Impact.** The Project will not have a cumulatively considerable contribution to any environmental impacts in the Project area or the region. The Project is designed to specifically support and serve the existing and approved expansion of the MHP.

c) **Less Than Significant Impact.** The Project will not cause substantial adverse effects on human beings, either directly or indirectly. During construction, the Project may result in temporary inconveniences, including limited traffic delays, noise, and visual impacts. However, these impacts will be less than significant and temporary.

Appendix A

CalEEMod Output Tables

Please see Air Quality and Greenhouse Gas Report Appendix A