



COACHELLA VALLEY WATER DISTRICT

COACHELLA VALLEY STORMWATER CHANNEL IMPROVEMENT PROJECT (AVENUE 54 TO THERMAL DROP STRUCTURE)

FINAL ENVIRONMENTAL IMPACT REPORT SCH No. 2015111067

Prepared by



Terra Nova Planning & Research, Inc.[®]
42635 Melanie Place, Suite 101
Palm Desert, CA 92211

October 30, 2019

TABLE OF CONTENTS

<u>SECTION</u>	<u>NUMBER</u>
1.0 INTRODUCTION to the FINAL EIR.....	1.1
2.0 RESPONSE to COMMENTS	2.1
3.0 ERRATA to the DRAFT EIR	3.1

1.0 INTRODUCTION TO THE FINAL EIR

1.1 Introduction

The Final Environmental Impact Report (Final EIR) consists of the Draft EIR, comments received during the 45-day public review and comment period, responses to those comments, and errata to the Draft EIR.

The Coachella Valley Water District (CVWD) has prepared this EIR to evaluate the potential environmental impacts related to the construction and operation of the Coachella Valley Stormwater Channel Improvement Project – Avenue 54 to Thermal Drop Structure (Project). CVWD is the lead agency under the California Environmental Quality Act (CEQA) for the Project.

The Final EIR has been prepared in accordance with CEQA (as amended) (Public Resources Code §§21000-21189.3) the State CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3, §§15000-15387), and CVWD’s Local CEQA Guidelines.

State CEQA Guidelines §15121 (Informational Document) states:

- a) *An EIR is an informational document which will inform public agency decision makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information which may be presented to the agency.*
- b) *While the information in the EIR does not control the agency’s ultimate discretion on the project, the agency must respond to each significant effect identified in the EIR by making findings under Section 15091 and if necessary, by making a statement of overriding consideration under Section 15093.*
- c) *The information in an EIR may constitute substantial evidence in the record to support the agency’s action on the project if its decision is later challenged in court.*

Pursuant to State CEQA Guidelines §15089 (Preparation of a Final Environmental Impact Report):

- a) *The Lead Agency shall prepare a Final EIR before approving the project. The contents of a Final EIR are specified in Section 15132 of these Guidelines.*
- b) *Lead Agencies may provide an opportunity for review of the Final EIR by the public or by commenting agencies before approving the project. The review of a Final EIR should focus on the responses to comments on the Draft EIR.*

1.2 Organization of the Final EIR

As directed by State CEQA Guidelines §15132, the Final EIR consists of three sections presented in one volume:

Section 1 – Introduction. This Section provides an introduction and summarizes CEQA requirements for preparation of responses to substantive public comments on the Draft EIR.

Section 2 – Response to Comments. This chapter includes a copy of the original comment letter, bracketing of the comment(s) raised, and CVWD’s response to each comment.

Section 3 – Errata to the Draft EIR. One minor revision to the Draft EIR is identified for clarification, to correct a minor clerical error within the document. A replacement page represents the edit to the Draft EIR by the Lead Agency. The page has been designed for the reader to insert the replacement page into the Draft EIR. The replacement page is formatted in revision fashion: ~~strikeout text~~ indicates the deleted text, and underlined text indicates the additional text.

1.3 Draft EIR Public Review Period

The 45-day public review and comment period for the Draft EIR began on September 6, 2019 with the distribution of the Draft EIR by CVWD to various public agencies, Native American tribal governments, nearby property owners, and individuals who had previously expressed an interest on the proposed project. In addition, a notice was published in the Desert Sun and La Prensa Hispana newspapers.

CVWD circulated the Notice of Completion/Notice of Availability and included a CD-copy of the Draft EIR to various federal, state and local agencies; California State Clearinghouse; local Native American tribal governments, Riverside County Clerk; and nearby property owners and individuals. A copy of the Draft EIR was provided on-line at CVWD’s website: www.cvwd.org

Copies of the Draft EIR were made available at the following locations:

- CVWD’s Palm Desert Office at 75515 Hovley Lane East, Palm Desert, CA 92211;
- CVWD’s Coachella Office at 51501 Tyler Street, Coachella, CA 92236; and
- City of Coachella Public Library at 1500 6th St, Coachella, CA 92236.

The public review and comment period closed on October 21, 2019. During the 45-day public review period, CVWD received a total of three (3) comment letters. Comments letters on the Draft EIR were assigned a letter. The comment letters are provided in Section 2.0 and are bracketed. Also included at the end of Section 2.0 is the State Clearinghouse closing letter acknowledging the end of the public comment period (10/21/2019), that no comments were received by state agencies, and that CVWD has complied with review requirements for draft environmental documents, pursuant to CEQA § 15087 Public Review of Draft EIR.

1.4 Certification and Project Selection Process

CVWD’ Board of Directors (CVWD Board) will hold a public meeting on November 12, 2019, in the Board Room at the Coachella Valley Water District Steve Robbins Administration Building, located at 75515 Hovley Lane East, Palm Desert, CA 92211 to consider certification of the Final EIR and its supporting materials.

In order to certify the Final EIR, the CVWD Board of Director’s must find that:

- a) The Final EIR has been completed in compliance with CEQA Statutes and Guidelines;
- b) The Final EIR was presented to the decision-making body of the lead agency and that the decision-making body reviewed and considered the information contained in the Final EIR prior to approving the Project; and

- c) The Final EIR reflects the Lead Agency’s independent judgment and analysis. (State CEQA Guidelines §15090a).

If the CVWD Board of Directors certifies the Final EIR, it would then consider Project approval.

1.5 Consideration of Recirculation

If significant new information is added to an EIR after public review, the lead agency is required to recirculate the revised document (CEQA Guidelines Section 15088.5). “Significant new information” includes, for example, a new significant environmental impact or a substantial increase in the severity of an impact. New information is not considered significant unless the document is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the proponent has declined to implement.

Under the standard found in CEQA Guidelines Section 15088.5, no significant new information has been added to the EIR after public notice was given of the availability of the Draft EIR for public review. Therefore, CEQA does not require recirculation of this Draft EIR.

2.0 RESPONSE TO COMMENTS

2.1 Introduction

The Response to Comments on the Draft EIR for the Project has been prepared in accordance with CEQA Guidelines Sections 15088, 15089 and 15132. CVWD's responses to comments on the Draft EIR represent a good-faith, reasoned effort to address the environmental issues identified by the commenters. This section of the Final EIR contains comment letters received during the public review and comment period, and responses to those comments.

2.2 Response to Comments

The following comment letters were received on the Draft EIR. These comments concern aspects of the Draft EIR, including clarification of information, methods of mitigation, inter-agency coordination and similar issues. Each comment letter is assigned a letter designation and each comment is bracketed on the right-hand side with a corresponding number to signify the comment number.



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A

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October 17, 2019

Mr. Luke Stowe
Environmental Supervisor
Coachella Valley Water District
P.O. Box 1058
Coachella, CA 92236

SUBJECT: CVWD Coachella Valley Stormwater Channel Improvement Project (Ave. 54 to Thermal Drop Structure)

Dear Mr. Stowe:

On September 13, 2019, the Imperial Irrigation District received from the Coachella Valley Water District, a Notice of Availability of a Draft Environmental Impact Report for the Coachella Valley Stormwater Channel Improvement Project – Avenue 54 to Thermal Drop Structure. The project involves improvements to existing channel facilities to restore channel flow conditions to convey a 100-year flood, provide the requisite freeboard and remove the existing threat of flooding during a 100-year storm event to the parcels within the area of benefit. The CVSC extends approximately 25 miles from the Washington Street bridge in La Quinta, California to the Salton Sea. The project extends from approximately 130 ft. north of Avenue 54 to approximately 300 ft. south of the Thermal Drop Structure, which is located between Avenues 57 and 58, within the city of Coachella corporate limits and in the unincorporated community of Thermal, in Riverside County, California.

The Imperial Irrigation District has reviewed the DEIR and has the following comments:

1. Section 2.13 *Mineral and Energy Resources*, page 2-153, paragraph 3, states "These include IID's K and K47 lines that parallel the channel and also cross the channel in the vicinity of the Airport Boulevard bridges." However, this should be amended to read "These include IID's 92 kV K transmission line and 12.47 kV K47 and K48 distribution lines that parallel the channel and also cross the channel in the vicinity of the Airport Boulevard bridges."
2. Under section 2.19 *Utilities and Service Systems*:
 - a) On page 2-201 paragraph 6, revise statement "IID transmission lines K and K47 occur within the project planning area" to read "IID 92 kV K transmission line and 12.47 kV K47 and K48 distribution lines occur within the project planning area."

A-1

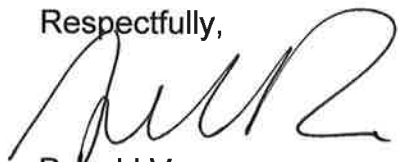
A-2

- b) On page 2-205 paragraph 2, under the heading ***h) Result in significant adverse impacts on energy resources and delivery systems***, the “Less than Significant Impact” determination should be revised to read “Less than Significant Impact with Mitigation” since the Proposed Project will impact existing IID energy service facilities, requiring the relocation of several power poles and associated supporting poles along the west channel right-of-way. A-3
3. Before any cranes, forklifts or other aerial equipment are raised, applicant should check for overhead wires. Please note that Cal/OSHA - Title 8 Regulations, Chapter 4. Division of Industrial Safety, Subchapter 5. Electrical Safety Orders, specifies the closest distance that non-qualified electrical workers can get to electrically energized conductors; people operating boom type lifting or hoisting equipment shall meet these clearances or safeguards requirements near distribution and transmission lines. A-4
4. For additional information regarding project impacts to IID electrical system, contact the IID Energy - La Quinta Division Customer Operations, 81-600 Avenue 58 La Quinta, CA 92253, at (760) 398-5841 and speak with the project development planner assigned to the area.
5. It is important to note that IID’s policy is to extend its electrical facilities only to those developments that have obtained the approval of a city or county planning commission and such other governmental authority or decision-making body having jurisdiction over said developments. A-5
6. CVWD will be required to provide rights-of-way and easements for any power line extensions needed to serve the project. A-6
7. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances). A copy of the IID encroachment permit application and instructions for its completion are available at <http://www.iid.com/departments/real-estate>. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements. A-7
8. Relocation of existing IID facilities (e.g., pole line relocations) to accommodate the project, and/or to accommodate street widening improvements imposed by the municipality where the project will take place, will be deemed project-driven and all costs, as well as securing of rights of way and easements for relocated facilities, shall be borne by CVWD. A-8

9. Public utility easements over all private and public roads and an additional ten (10) feet in width on both side of the private and public roads shall be dedicated to IID for the construction, operation, and maintenance of electrical infrastructure. A-9
10. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, etc.) need to be included as part of the project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully mitigated. **Any mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.** A-10
11. Dividing a project into two or more pieces and evaluating each piece in a separate environmental document (Piecemealing or Segmenting), rather than evaluating the whole of the project in one environmental document, is explicitly forbidden by CEQA, because dividing a project into a number of pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less-than-significant impact on the environment, but which together may result in a significant impact. Segmenting a project may also hinder developing comprehensive mitigation strategies. In general, if an activity or facility is necessary for the operation of a project, or necessary to achieve the project objectives, or a reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis. The project description should include all project components, including those that will have to be approved by responsible agencies. The State CEQA Guidelines define a project under CEQA as "the whole of the action" that may result either directly or indirectly in physical changes to the environment. This broad definition is intended to provide the maximum protection of the environment. CEQA case law has established general principles on project segmentation for different project types. For a project requiring construction of offsite infrastructure, the offsite infrastructure must be included in the project description. *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App. 4th 713. A-11
12. Be advised that landscaping can be dangerous if items are planted too close to IID's electrical equipment. In the event of an outage, or equipment failure, it is vital that IID personnel have immediate and safe access to its equipment to make the needed repairs. For public safety, and that of the electrical workers, it is important to adhere to standards that limit landscaping around electrical facilities. IID landscaping guidelines are available at <https://www.iid.com/energy/vegetation-management>. A-12

Should you have any questions, please do not hesitate to contact me at (760) 482-3609 or at dvargas@iid.com. Thank you for the opportunity to comment on this matter.

Respectfully,



Donald Vargas
Compliance Administrator II

Enrique B. Martinez – General Manager
Mike Pacheco – Manager, Water Dept.
Marilyn Del Bosque Gilbert – Manager, Energy Dept.,
Jamie Asbury – Deputy Manager, Energy Dept., Operations
Charles Berry – Mgr., Energy Dept., Distr. Services & Maintenance Operations
Enrique De Leon – Asst. Mgr., Energy Dept., Distr., Planning, Eng. & Customer Service
Vance Taylor – Asst. General Counsel
Robert Laurie – Outside Counsel
Michael P. Kemp – Superintendent, Regulatory & Environmental Compliance
Laura Cervantes – Supervisor, Real Estate

Comment Letter A. Imperial Irrigation District (Donald Vargas, October 17, 2019)

CVWD appreciates IID's participation in the public review period of this EIR. CVWD staff have been coordinating project design with IID for the duration of the design and planning phase for this project. CVWD will continue to coordinate these efforts with IID.

Comment A-1: Section 2.13 Mineral and Energy Resources, page 2-153, paragraph 3, states "These include IID's K and K47 lines that parallel the channel and also cross the channel in the vicinity of the Airport Boulevard bridges." However, this should be amended to read "These include IID's 92 kV K transmission line and 12.47 kV K47 and K48 distribution lines that parallel the channel and also cross the channel in the vicinity of the Airport Boulevard bridges."

Response A-1: Comment noted and incorporated into the EIR by reference.

Comment A-2: Under section 2.19 Utilities and Service Systems: On page 2-201 paragraph 6, revise statement "IID transmission lines K and K47 occur within the project planning area" to read "IID 92 kV K transmission line and 12.47 kV K47 and K48 distribution lines occur within the project planning area."

Response A-2: Comment noted and incorporated into the EIR by reference.

Comment A-3: On page 2-205 paragraph 2, under the heading h) Result in significant adverse impacts on energy resources and delivery systems, the "Less than Significant Impact" determination should be revised to read "Less than Significant Impact with Mitigation" since the Proposed Project will impact existing IID energy service facilities, requiring the relocation of several power poles and associated supporting poles along the west channel right-of-way.

Response A-3: Comment noted. The "Less Than Significant" determination is accurate in light of the action as a whole. The Project includes not only the subject channel improvements, but also the relocation of utilities, including those owned and operated by IID. In consideration of the action as a whole (see Comment and Response A-11, below), the Project is self-mitigating for potential impacts to IID facilities, providing for their relocation as a part of the Project. Project design has incorporated the necessary relocation of IID facilities in coordination with IID and applicable design criteria.

Comment A-4: Before any cranes, forklifts or other aerial equipment are raised, applicant should check for overhead wires. Please note that Cal/OSHA - Title 8 Regulations, Chapter 4. Division of Industrial Safety, Subchapter 5. Electrical Safety Orders, specifies the closest distance that non-qualified electrical workers can get to electrically energized conductors; people operating boom type lifting or hoisting equipment shall meet these clearances or safeguards requirements near distribution and transmission lines.

Response A-4: Comment noted and incorporated by reference into the EIR. Compliance with all applicable Cal/OSHA regulations, including but not limited to Title 8 Regulations, will be required of the project contractor.

- Comment A-5:** It is important to note that IID's policy is to extend its electrical facilities only to those developments that have obtained the approval of a city or county planning commission and such other governmental authority or decision-making body having jurisdiction over said developments.
- Response A-5:** Comment noted. The extension of electrical facilities is not a part of the Project. The Project involves relocations of existing electrical facilities to avoid conflicts caused by the proposed channel improvements.
- Comment A-6:** CVWD will be required to provide rights-of-way and easements for any power line extensions needed to serve the project.
- Response A-6:** Comment noted.
- Comment A-7:** Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances). A copy of the IID encroachment permit application and instructions for its completion are available at [http://www.iid.com/departments/rea-l estate](http://www.iid.com/departments/rea-l%20estate). The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements.
- Response A-7:** Comment noted. CVWD will continue to confer with IID regarding this project, and ensure that appropriate encroachment permits or agreements are in hand before any encroachment into IID's right of way or easements.
- Comment A-8:** Relocation of existing IID facilities (e.g., pole line relocations) to accommodate the project, and/or to accommodate street widening improvements imposed by the municipality where the project will take place, will be deemed project-driven and all costs, as well as securing of rights of way and easements for relocated facilities, shall be borne by CVWD.
- Response A-8:** Comment noted. This Project proponent is the Coachella Valley Water District. No municipal action is associated with this Project. CVWD is closely coordinating with IID for the relocation of existing facilities that are in conflict with the Project. The need for additional rights-of-way or easements to complete this Project is not anticipated.
- Comment A-9:** Public utility easements over all private and public roads and an additional ten (10) feet in width on both side of the private and public roads shall be dedicated to IID for the construction, operation, and maintenance of electrical infrastructure.
- Response A-9:** Comment noted. No additional public utility easements are expected to be required in order to complete and operate the Project.

Comment A-10: Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, etc.) need to be included as part of the project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully mitigated. **Any mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.**

Response A-10: Comment noted. As noted in Response A-3, above, the relocation of utilities, including those IID facilities that could be affected by the channel improvement project, are described in the EIR Project Description and were thoroughly analyzed in the EIR. IID will serve as a *Responsible Agency* pursuant to CEQA and may rely on the subject EIR to provide CEQA clearance for IID's facilities relocation project.

Comment A-11: Dividing a project into two or more pieces and evaluating each piece in a separate environmental document (Piecemealing or Segmenting), rather than evaluating the whole of the project in one environmental document, is explicitly forbidden by CEQA, because dividing a project into a number of pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less-than-significant impact on the environment, but which together may result in a significant impact. Segmenting a project may also hinder developing comprehensive mitigation strategies. In general, if an activity or facility is necessary for the operation of a project, or necessary to achieve the project objectives, or a reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis. The project description should include all project components, including those that will have to be approved by responsible agencies. The State CEQA Guidelines define a project under CEQA as "the whole of the action" that may result either directly or indirectly in physical changes to the environment. This broad definition is intended to provide the maximum protection of the environment. CEQA case law has established general principles on project segmentation for different project types. For a project requiring construction of offsite infrastructure, the offsite infrastructure must be included in the project description. *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App. 4th 713.

Response A-11: As noted in Responses A-3 and A-10, the Project analyzed in the EIR included the relocation of IID power poles and lines at two locations within the overall project area. There is no project piecemealing or segmentation and the whole of the action, including the relocation of IID facilities, has been fully analyzed.

Comment A-12: Be advised that landscaping can be dangerous if items are planted too close to IID's electrical equipment. In the event of an outage, or equipment failure, it is vital that IID personnel have immediate and safe access to its equipment to make the needed repairs. For public safety, and that of the electrical workers, it is important to

adhere to standards that limit landscaping around electrical facilities. IID landscaping guidelines are available at <https://www.iid.com/energy/vegetation-management>.

Response A-12: Comment noted. No planting of landscaping is proposed as a part of the Project.



03-011-2015-008

October 21, 2019

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

Re: Draft Environmental Impact Report for the Coachella Valley Stormwater Channel Improvement Project (Avenue 54 to Thermal Drop Structure)

Dear Mr. William Patterson,

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to include the Tribal Historic Preservation Office (THPO) in the Avenue 54 to Thermal Drop Structure project. We have reviewed the documents and have the following comments:

*The Impact Analysis for b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5 should be changed from "No Impact" to "Less than Significant with Mitigation." Due to the presence of cultural resources within the project area, there is a possibility of subsurface archaeological deposits. B-1

*A mitigation measure should be added to the Cultural and Tribal Cultural Resources Mitigation Measures to include a Native American Cultural Monitor present for all ground disturbing activities associated with this project. B-2

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

Cordially,

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

Comment letter B. Aqua Caliente Band of Cahuilla Indians (Lacy Padilla, October 21, 2019)

CVWD appreciates the Aqua Caliente Band of Cahuilla Indians participation in the public review period of this EIR. CVWD environmental staff have discussed the project with Tribal staff through project communication, cultural resources survey consultation, and AB 52 Tribal Cultural Resources consultation. CVWD environmental staff will continue to communicate with Tribal staff regarding this project.

Comment B-1: The Impact Analysis for b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 should be changed from "No Impact" to "Less than Significant with Mitigation." Due to the presence of cultural resources within the project area, there is a possibility of subsurface archaeological deposits.

Response B-1: The Project involves improvements to a reach of the Coachella Valley Stormwater Channel that was initially excavated more than 50 years ago. The Project involves concrete slope-lining of the channel side slopes and portions of channel bottom. Work outside the channel is limited to the related utility relocations in proximity to the channel.

Construction projects requiring excavation have the potential to encounter subsurface archaeological deposits; as such, the Draft EIR includes mitigation measures (CUL-1 and CUL-2) that require work be halted, in the event archaeological or tribal cultural resources are discovered, including the discovery of cremations or burials. These mitigation measures also require that a qualified professional archaeologist be called in to assess potential resources and document appropriately, including outreach to the coroner if human remains are discovered (consistent with State Health and Safety codes).

In review of the comment and Draft EIR section referenced, errata to the EIR is included in the Final EIR. This erratum clarifies the minor clerical error; whereas the EIR provides for mitigation measure CUL-1 to reduce or avoid a potential adverse change in the significance to an archeological resource; and while the conclusion remains and mitigation is required, the clerical edit is to conclude this threshold is "Less than Significant with Mitigation".

Comment B-2: A mitigation measure should be added to the Cultural and Tribal Cultural Resources Mitigation Measures to include a Native American Cultural Monitor present for all ground disturbing activities associated with this project.

Response B-2: The recommended mitigation measure is hereby incorporated by reference in the Project EIR. Prior to the initiation of new site disturbance, CVWD environmental staff shall notify the Tribal staff with the Agua Caliente Band of Cahuilla Indians, and coordinate the appointment of a Native American Cultural Monitor for specific excavation activities.



Patricia Romo, P.E.
Director of Transportation

COUNTY OF RIVERSIDE
TRANSPORTATION AND
LAND MANAGEMENT AGENCY

Transportation Department

Mojahed Salama, P.E.
Deputy for Transportation/Capital Projects
Richard Lantis, P.L.S.
Deputy for Transportation/Planning and
Development

October 23, 2019

William Patterson, Environmental Supervisor
Coachella Valley Water District
75-515 Hovley Lane East
Palm Desert, CA 92211

RE: Draft Environmental Impact Report – SCH No. 2015111067
Coachella Valley Storm Channel (CVSC) Improvement Project /Avenue 54 to Thermal
Drop Structures

Dear Mr. Patterson:

Riverside County Transportation Department submits the following comments in response to the Notice of Completion/Notice of Availability of the Draft Environmental Impact Report (DEIR) for the Coachella Valley Storm Channel (CVSC) Improvement Project.

The Transportation Department understands that the Project intends to lower the riverbed and install concrete lining at County maintained bridges at Airport Boulevard and Highway 111. The Transportation Department requests that the DEIR include investigation by a qualified bridge engineer and geotechnical engineer to evaluate the impact of a seismic event on the Airport Bridge and the Highway 111 Bridge. The Transportation Department also requests the preparation of a hydraulic study and structural stability study, in order to document the storm level at which the bridges would become structurally deficient; and, provide retrofit counter measures.

C-1

Please contact me with any questions at (951) 955-6759 or at mzambon@rivco.org.

Sincerely,

Mary Zambon, Environmental Project Manager

Comment Letter C. Riverside County Transportation Department (Mary Zambon, October 23, 2019)

CVWD appreciates the County's participation in the public review period of this EIR. CVWD engineering staff have been coordinating project design with the Riverside County Transportation Department (County) for the duration of the design and planning phase for this project. CVWD will continue to coordinate these efforts with the County.

Comment C-1: The Transportation Department understands that the Project intends to lower the riverbed and install concrete lining at County maintained bridges at Airport Boulevard and Highway 111. The Transportation Department requests that the DEIR include investigation by a qualified bridge engineer and geotechnical engineer to evaluate the impact of a seismic event on the Airport Bridge and the Highway 111 Bridge. The Transportation Department also requests the preparation of a hydraulic study and structural stability study, in order to document the storm level at which the bridges would become structurally deficient; and, provide retrofit counter measures.

Response C-1: Comment noted. As requested by the County via letters dated September 17, 2019 and October 23, 2019, CVWD is currently in the process of engaging a qualified bridge engineer and geotechnical engineer to perform evaluation of a seismic event on both bridges with and without the Project. CVWD is also preparing a hydraulic study to evaluate and document the impacts on the bridges with or without the Project CVWD will then coordinate with the County to discuss and come into an agreement on the findings from these studies as related to mitigation, i.e. retrofit counter measures. CVWD will continue coordination with the County through the design and construction phases of the Project.



Gavin Newsom
Governor

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



Kate Gordon
Director

October 22, 2019

William Patterson
Coachella Valley Water District
75-519 Hovley Lane East
Palm Desert, CA 92211

Subject: Coachella Valley Stormwater Channel Improvement Project -- Avenue 54 to the Thermal Drop Structure

SCH#: 2015111067

Dear William Patterson:

The State Clearinghouse submitted the above named EIR to selected state agencies for review. The review period closed on 10/21/2019, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act, please visit: <https://ceqanet.opr.ca.gov/2015111067/2> for full details about your project.

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

Sincerely,

Scott Morgan
Director, State Clearinghouse

3.0 ERRATA TO THE DRAFT EIR

3.1 Introduction

This section includes the minor changes to the Draft EIR because of minor clerical errors. These minor revisions to the environmental analyses are made in Section 2.7 Cultural and Tribal Cultural Resources of the EIR. None of these changes constitute significant new information, as defined under CEQA Guidelines Section 15088.5.

3.2 Replacement Pages

This section contains the replacement pages associated with the Final EIR. To reduce the cost of preparing the Final EIR, only those pages of the Draft EIR which have been modified have been reproduced. These replacement pages are presented in a manner which allows the reader to easily use in conjunction with the Draft EIR.

The replacement pages are presented by section, as they would appear in the Draft EIR. Text that has been added to the document is indicated in underlined text, while text that has been deleted is indicated with ~~strikeout text~~.

Cultural and Tribal Cultural Resources: The impact determination for threshold *b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?* has been changed from “No Impact,” to “Less than Significant with Mitigation.” This erratum clarifies the minor clerical error; whereas the EIR provides for mitigation measure CUL-1 to reduce or avoid a potential adverse change in the significance to an archeological resource. Changes were made to page 2-68.

Impact Analysis

This analysis addresses potential impacts associated with the channel improvement project, including limited ground disturbance outside the channel associated with the relocation of the CVWD irrigation lateral, SCG gas pipeline, and IID power poles (see Exhibits 1-6A through 1-6D). The following discussion evaluates the potential impacts to sensitive cultural resources, including Tribal cultural resources, and other archaeological, historic and paleontological resources, as a result of the construction of the Proposed Project.

a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

No Impact. As discussed in Section 2.7.5 above, no “historic properties” or “historical resources” are present within the project APE, and thus the undertaking will have No Effect/No Impact on any “historic properties”/ “historical resources”, as defined in § 15064.5 of the CEQA Guidelines.

Utility Projects

No “historic properties”, “historical resources” or “archaeological resource” are present within the project APE, which includes the IID project sites and most of the CVWD irrigation lateral. Also, the western portions of the SCG gas line relocation lies outside the APE but in areas within disturbed and graded portions of the Highway 111 right of way. While resources are not expected to be encountered during excavations associated with the subject utility projects, mitigation measure CUL-1 will further ensure that the Project-related utility projects will have No Effect/No Impact on any “historic property”, “historical resource” or “archaeological resource”, as defined in § 15064.5 of the CEQA Guidelines.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

~~No Impact.~~ **Less than Significant with Mitigation.** The cultural resources study prepared for the project provides CVWD with the necessary information and analysis to determine whether the undertaking would have an effect on any archaeological resources or “historic properties,” as defined by CEQA Guidelines §15064.5, that may exist within the project APE. The results of this research and analysis indicate that these historic-period sites were previously recorded as lying within or partially within the APE. Site 33-019859 was recorded in 2011 as a circa 1940s domestic refuse pit that is evidently no longer in existence.

The other four sites represent the Southern Pacific (now Union Pacific) Railroad, a segment of Fillmore Street, and two segments of the CVSC itself. All of them were previously determined not to be eligible for listing the National Register of Historic Places or the California Register of Historical Resources, and the present study concurs with those conclusions. Therefore, these four sites do not meet the definition of “historic properties” or “historical resources.”

In addition to the sites listed above, three prehistoric isolates and six historic-period isolates were observed within the APE during the field survey and subsequently recorded as 33-024735 to 33-024743 in the California Historical Resources Inventory. The prehistoric isolates consist of two ceramic sherds and a quartz core, and the historic-period isolates consist of glass shards, bottle bases, and a complete bottle. Occurring out of depositional context, such isolated artifacts do not constitute archaeological sites and are not considered potential “historic properties”/“historical resources.”

A modest residential building of mid-20th century character was noted in the project APE and is the remnant of a ranch complex that dated to the 1940s-1950s. It has been mostly demolished and replaced by a mobile home park and no longer exhibits sufficient historic character to be considered a potential “historic