INLAND FEEDER – FOOTHILL PUMP STATION INTERTIE PROJECT

Initial Study/Mitigated Negative Declaration

The Metropolitan Water District of Southern California
700 North Alameda Street
Los Angeles, CA 90012

Report Number ER 1694

May 2024

CONTENTS

Initial Study/Mitigated Negative Declaration

Page

Figures

Tables

Appendices

INLAND FEEDER – FOOTHILL PUMP STATION INTERTIE PROJECT

Initial Study/Mitigated Negative Declaration

1.0 Project Description

1.1 Background

The Metropolitan Water District of Southern California (Metropolitan) is a regional water wholesaler that provides water for 26 public agency members that, in turn, provide water to approximately 19 million people in parts of Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura counties. The mission of Metropolitan is to provide its service area with an adequate and reliable supply of high-quality water to meet present and future needs in an environmentally and economically responsible way.

Metropolitan imports water from the State Water Project (SWP) and from the Colorado River via the Colorado River Aqueduct (CRA). Approximately 45 percent of Southern California's water supply comes from these two sources. In addition to imported water, Metropolitan invests in local resource development along with its member agencies and uses groundwater banking and transfer programs. Metropolitan also manages water demands by promoting and investing in conservation and water use efficiency projects. Water supplies are conveyed through Metropolitan's distribution system, which includes the CRA, 16 small hydroelectric facilities, nine reservoirs, 819 miles of large-scale pipes, and five water treatment plants. On average, Metropolitan conveys approximately 1.7 billion gallons of water daily throughout its distribution system.

The Inland Feeder is owned and operated by Metropolitan, and was constructed between 1997 and 2009. The pipeline is 44 miles long and 12 feet in diameter. The primary purpose of the Inland Feeder is to connect SWP supplies to Metropolitan's Eastern Distribution System. The pipeline begins at the Department of Water Resources' (DWR's) Devil Canyon Afterbay in the city of San Bernardino and terminates at Metropolitan's Diamond Valley Lake (DVL) near the city of Hemet.

In the years since the Inland Feeder was constructed, several drought emergencies have been declared in California. Former Governor Edmund G. Brown Jr. had proclaimed a drought state of emergency from April 2014 to April 2017, and Governor Gavin Newsom declared a drought state of emergency from October 2021 to March 2023. While California is not operating under a declared drought emergency at present, the western region of the United States continues to be in a drought. In response to these drought events, Metropolitan has been developing methods to improve distribution system flexibility to operate more efficiently in both wet years and under the more frequently occurring drought conditions.

1.2 Purpose and Need

Metropolitan is proposing to construct an intertie connection between the Inland Feeder and the Foothill Pump Station (proposed Project). The purpose of the proposed Project would be to enhance Metropolitan's water delivery flexibility in response to drought conditions and limited SWP allocations. The proposed Project would allow Metropolitan to pump and deliver water from DVL to the Rialto service area, which is currently only able to receive SWP water. An intertie connection is needed with the San Bernardino Valley Municipal Water District's (SBVMWD) Foothill Pump Station to provide hydraulic lift to allow water delivery from DVL into DWR's Devil's Canyon Afterbay and ultimately Metropolitan's Rialto Pipeline.

1.3 Project Location and Land Use

The proposed Project is located on an approximately 10-acre triangular-shaped parcel, immediately south of the intersection of Cone Camp Road and Greenspot Road in Highland, California (Assessor Parcel Nos. 121038124, 121038125, and 029115102; proposed Project Area). The proposed Project Area spans 6.615 acres of the 10-acre parcel and is bounded by Greenspot Road and residential development to the north, a dirt road and open space to the south, and large-lot single-family residences and open space to the east and west. The site is generally accessible from State Route 210 (Foothill Freeway), located roughly 3.5 miles to the west. Local access to the proposed Project Area is provided by Cone Camp Road, with entrance gates immediately north and south of the Foothill Pump Station. Two of the three parcels within the proposed Project Area are designated as Planned Development on the City of Highland Land Use Map (2022) and are zoned for Planned Development/Single Family Residential (PD/R-1) use. The third and southernmost parcel is designated as Open Space and zoned as Open Space (OS). Figure 1-1 shows the proposed Project Area in a regional context, and Figure 1-2 shows the location of existing and proposed Project facilities.

1.4 Project Description

The proposed Project consists of the installation of two new pipeline connections, referred to as the supply pipeline and discharge pipeline, between the Inland Feeder and the SBVMWD-Inland Feeder Interconnection Line 1 and Foothill Pump Station. Both new pipelines would have their own valves, valve vault structures, and hydropneumatic surge tanks (surge tanks). A total of four surge tanks would be constructed. A large vault structure with a valve would be installed on the Inland Feeder to control direction of water flow along the Inland Feeder. The supply pipeline would send water from the Inland Feeder to the Foothill Pump Station for pumping. The discharge pipeline would send the pumped water back into the Inland Feeder, allowing it to have enough pressure to flow to its final destination of the Rialto Pipeline.

The majority of the proposed Project components would be constructed underground. This includes both the supply and discharge pipelines, the vault structures, and appurtenant components in the vaults. The four surge tanks would be constructed aboveground on concrete pads, as well as the components connecting the surge tanks to the supply and discharge pipelines. Vault structures would have a small aboveground component consisting of access lids to the vaults (Figure 1-2).

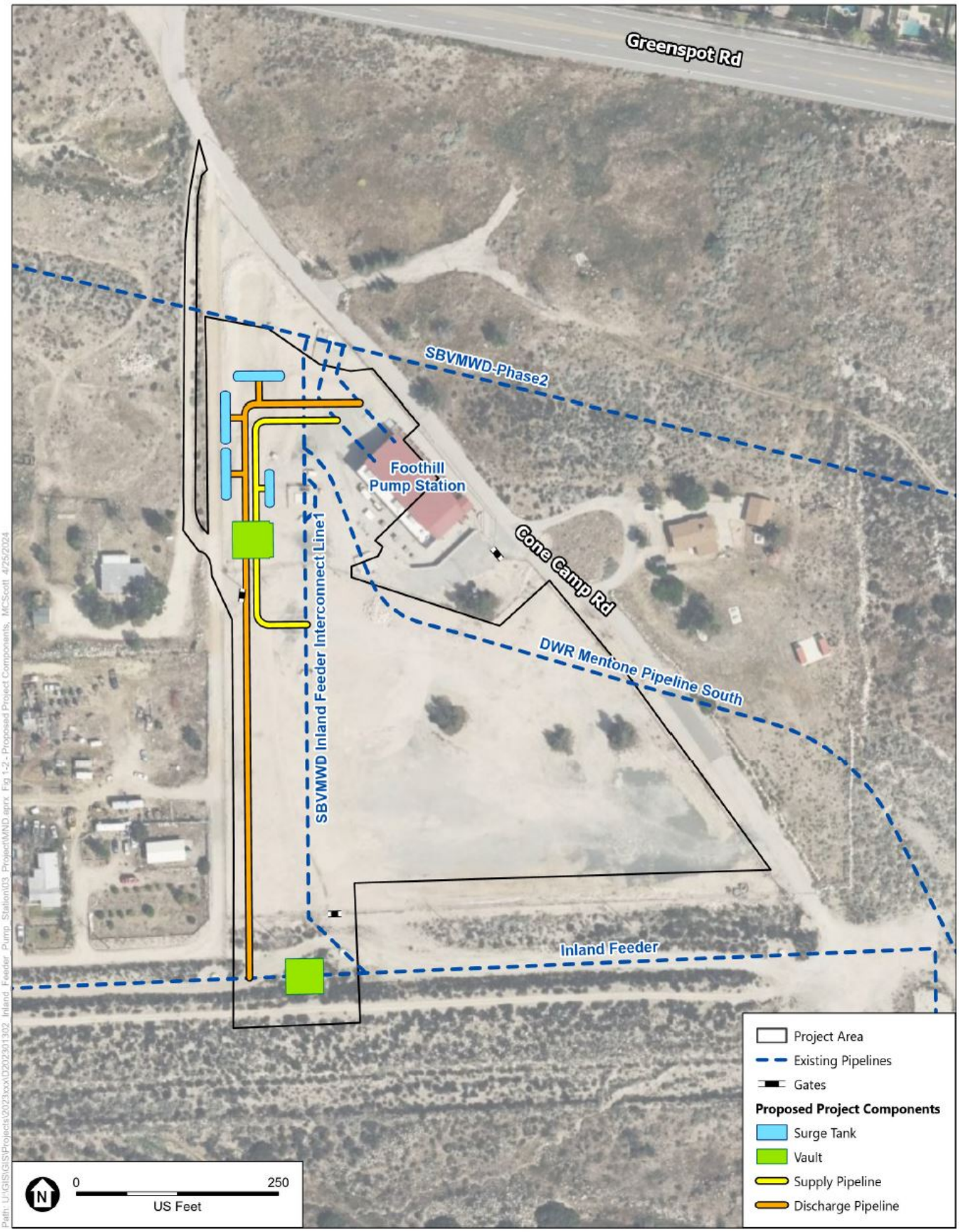
The proposed Project is described in greater detail in the following sections.

SOURCE: ESA, 2024

Inland Feeder - Foothill Pump Station Intertie Project

Figure 1-1
Project Location

ESA



SOURCE: ESA, 2024

Inland Feeder - Foothill Pump Station Intertie Project

Figure 1-2
Proposed Project Components

ESA

1.4.1 Pipelines

The proposed Project would include construction of two pipelines. An approximately 500-foot-long, 54-inch supply pipeline would connect the Inland Feeder with the SBVMWD-Inland Feeder Interconnection Line 1. An approximately 50-foot-wide and 25-foot-deep trench would be required to install the supply connection pipeline. Once constructed, the supply connection pipeline would be entirely underground.

The proposed Project would also construct a 1,000-foot-long, 54-inch discharge pipeline from the Foothill Pump Station, connecting back to the Inland Feeder. A 50-foot-wide by 25-foot-deep trench would be required to install the discharge pipeline. If feasible, a 224-foot portion of the discharge pipeline may be contained within the same trench as the supply pipeline in order to reduce excavation activities. Once constructed, the discharge pipeline would be entirely underground.

1.4.2 Vault structures, valves, and connections

Sectionalizing Valve and Vault

The proposed Project would construct an approximately 45-foot by 40-foot sectionalizing vault structure on the Inland Feeder. The sectionalizing vault structure would be underground, with an estimated excavation depth of 38 feet in order to connect with the buried Inland Feeder. The sectionalizing vault structure would house a 132-inch butterfly valve within the vault structure to connect with the Inland Feeder in order to control flow to the supply and discharge pipelines. Once constructed, the vault structure would be entirely underground.

Combined Valves and Vault

The proposed Project would construct an approximately 50-foot by 40-foot combined valve vault structure for valves needed to control the supply and discharge pipelines. The combined valve vault structure would be underground, with an estimated excavation depth of 29 feet. The combined valve vault structure would require installation of two, 54-inch butterfly valves within the vault. Once constructed, the vault structure would be entirely underground.

Connections

A “T” connection on the existing SBVMWD-Inland Feeder Interconnection Line 1 would be installed to connect the proposed supply pipeline with the existing SBVMWD-Inland Feeder Interconnection Line 1. This connection would occur approximately 50 feet south of the proposed combined valve vault structure and would be underground.

A “Y” connection fitting to the existing Foothill Pump Station piping would be installed to connect the supply pipeline to the Foothill Pump Station. The “Y” connection would be located west of the Foothill Pump Station and would be underground.

1.4.3 Surge Tanks

The proposed Project would include the installation of one, 30,000-gallon surge tank and three 50,000-gallon surge tanks on concrete pads. The concrete pads would be approximately 22 feet by 45 feet and would require excavation to a depth of approximately 10 feet for the tank pad footings. The 30,000-gallon surge tank would be approximately 11 feet wide by 40 feet in length by 16.5 feet in height. The three

50,000-gallon surge tanks would be approximately 14 feet wide by 57 feet in length by 19 feet in height. An air compressor located on the tank pads would be required to stabilize the pressure within the tanks, and an 18-foot-deep trench would be excavated to connect the surge tanks to the supply and discharge pipelines. The four surge tanks would be located aboveground, along with small portions of connection piping to the supply and discharge pipelines.

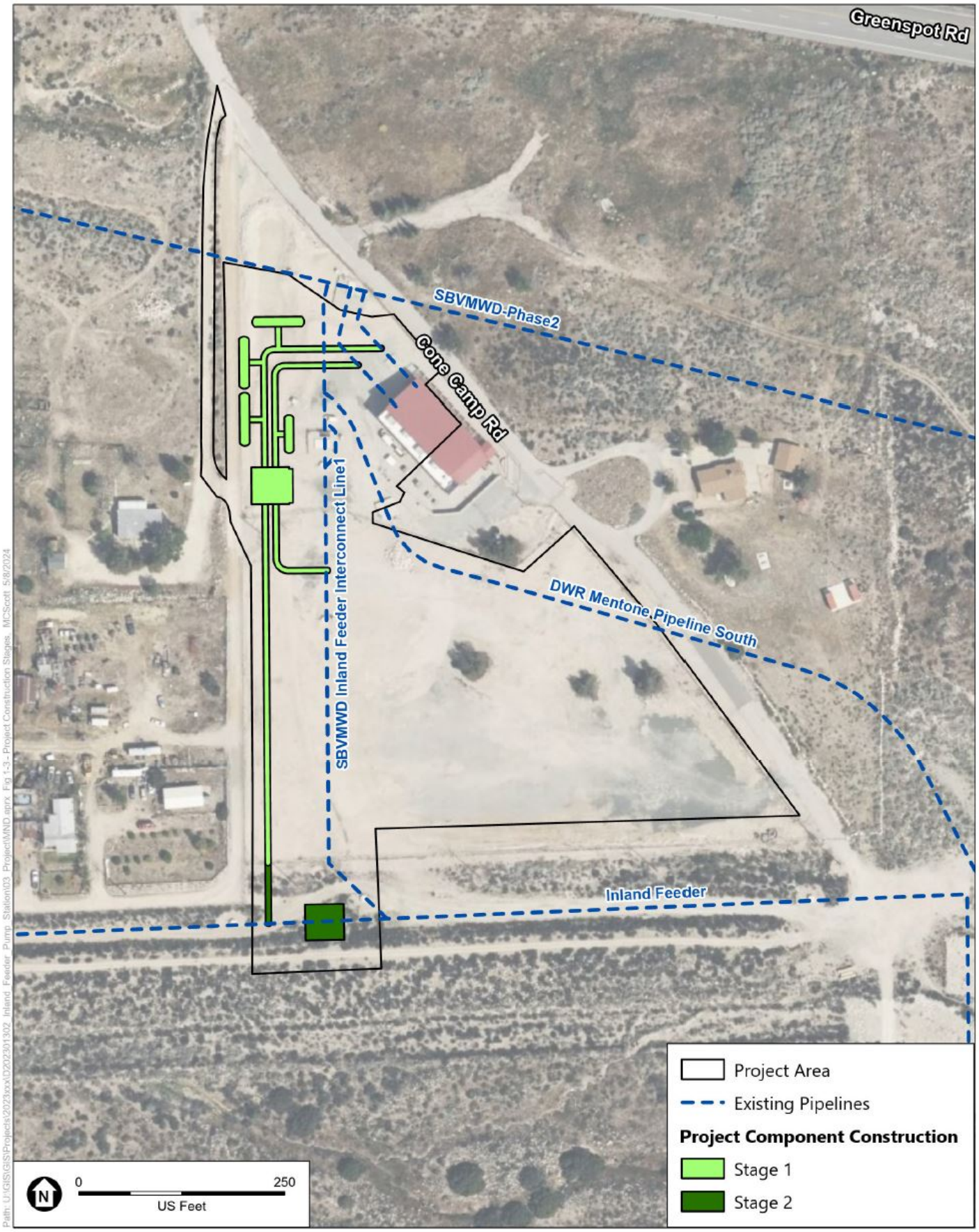
1.5 Project Construction

1.5.1 Schedule

The proposed Project construction would be performed in two construction stages and would take approximately 12 months to complete, occurring over a 31-month period, with a break in between the two stages. Stage 1 would occur from approximately January 2025 through November 2025; Stage 2 would occur between approximately fall 2026 through July 2027 (see Table 1-1). The work would be staged in order to accommodate the timeline for obtaining permits associated with construction of the Stage 2 components outside of the fenced Foothill Pump Station facility (refer to Table 1-3, Figure 1-3, and Section 3.4, *Biological Resources*).

TABLE 1-1
CONSTRUCTION SCHEDULE

Construction Stages	Construction Start Month	Construction Duration (Months)
Stage 1		
Supply Connection Components		
Pipeline Trenching and Installation	January 2025	1
Vault Structure Excavation	February 2025	1
Vault Structure Installation	March 2025	1
Surve Tank Excavation	April 2025	1
Surge Tank Installation	May 2025	2
Discharge Connection Components		
Pipeline Trenching and Installation	July 2025	1
Surge Tank Excavation	October 2025	1
Surge Tank Installation	November 2025	2
Stage 2		
Discharge Connection Components		
Vault Structure Excavation	October 2026	1
Vault Structure Installation	November 2026	1



SOURCE: ESA, 2024

Inland Feeder - Foothill Pump Station Intertie Project

Figure 1-3
Proposed Project Construction Stages

ESA

Stage 1 construction activities would take place within the fenced Foothill Pump Station facility. Stage 1 would involve construction and installation of the supply pipeline, surge tanks, combined valve vault structure, pipeline connections, and approximately 900 feet of the discharge pipeline, from the Foothill Pump Station to the southern fence line of the Foothill Pump Station facility. Stage 2 construction activities would occur at the southern portion of the Foothill Pump Station facility, south of the existing property fence. Stage 2 construction activities would involve installation of the sectionalizing valve vault structure, the excavation and installation of the remaining 100 feet of the discharge pipeline, and construction and installation for the 132-inch butterfly valve on the Inland Feeder. The proposed Project components are shown in Figure 1-2.

Construction activities would typically occur Monday through Friday, although work may be conducted on Saturdays as needed with the approval of Metropolitan staff. While most of the construction would occur during daytime hours (between 7 a.m. and 4 p.m.), occasional nighttime construction activities may be required to shut down the Inland Feeder and install the tie-in connection.

1.5.2 Construction Staging and Access

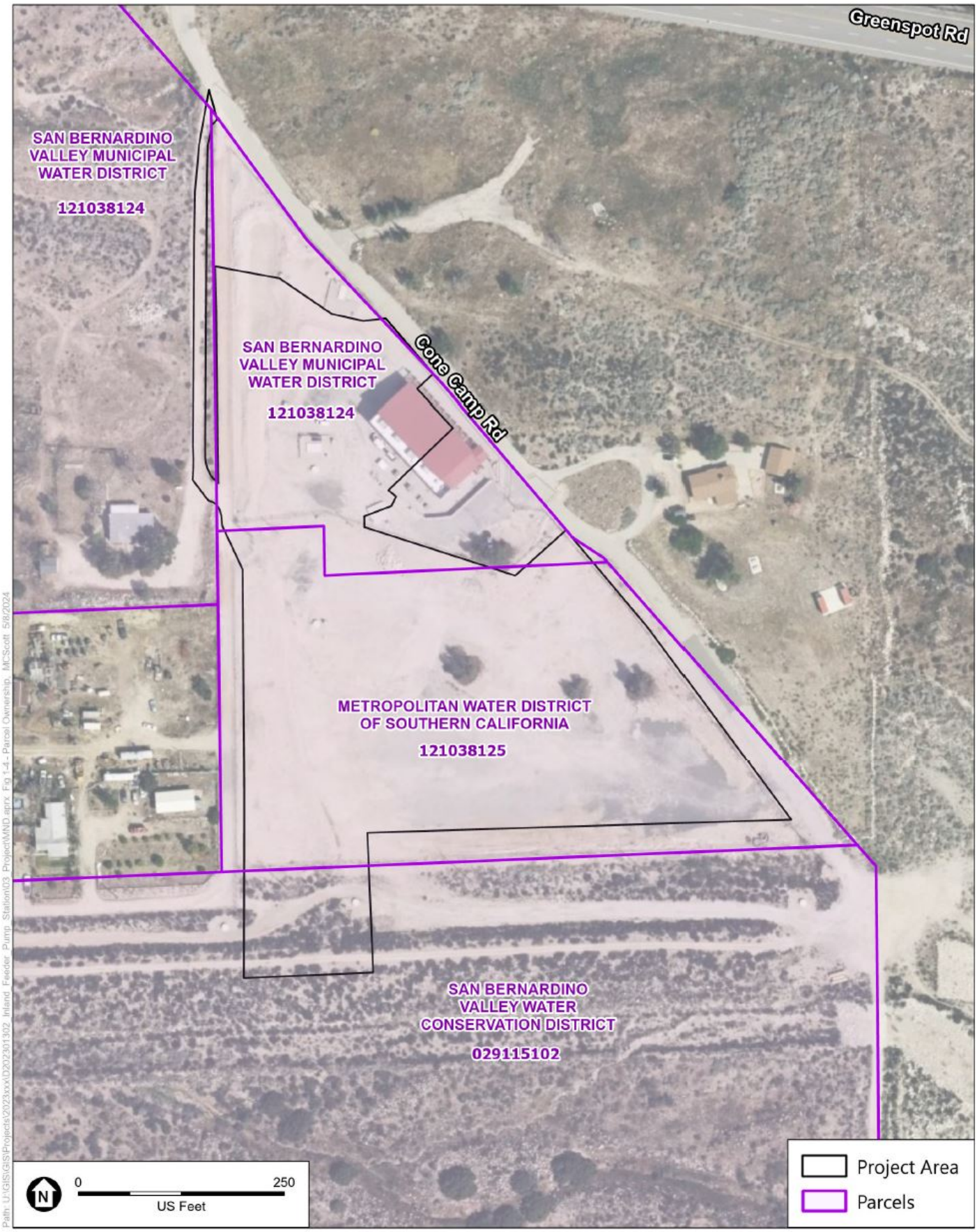
Metropolitan owns 5.47 acres of the proposed Project Area (Figure 1-4) in fee and has easement rights to approximately one acre of the proposed Project Area. The remainder of the proposed Project Area is owned by the SBVMWD and the San Bernardino Valley Water Conservation District (SBVWCD). SBVWCD also owns the parcel located directly south of Metropolitan's triangular-shaped fee property. Metropolitan would obtain additional easement for the SBVWCD property located between Metropolitan's Inland Feeder alignment and its fee property.

Access to the Foothill Pump Station facility site would be from Cone Camp Road through the access gate located north of the pump station, while access to the Inland Feeder would be through Metropolitan's gate and access road located south end of the proposed Project Area. Temporary construction access is required on SBVMWD's and SBVWCD's properties to construct the connection between the Foothill Pump Station and the Inland Feeder.

Construction staging and storage would occur on the open dirt and gravel space within Metropolitan's fee property in the proposed Project Area. Construction worker parking would primarily occur within the Inland Feeder – Foothill Pump Station facility. If there are space limitations at the site, the proposed Project Contractor(s) would carpool workers to and from the proposed Project Area.

1.5.3 Construction Activities

Construction activities would include approximately 1,086 trucks for 2,172 trips (accounting for approximately 8,680 cubic yards [cy] of soil/material export and 6,500 cy of soil/material import), with a maximum of 44 trucks per day for soil/material import/export. The proposed Project would also include concrete import requiring approximately 924 trucks for 1,848 trips, with a maximum of approximately 34 trucks per day. The proposed Project would require a total of 58 workers, with a maximum of approximately 9 workers per day. Proposed Project construction equipment are listed in Table 1-2.



SOURCE: ESA, 2024

Inland Feeder - Foothill Pump Station Intertie Project

Figure 1-4
Parcel Ownership

ESA

TABLE 1-2
CONSTRUCTION EQUIPMENT

Construction Equipment	Total
Air Compressors	4
Tractors/Loaders/Backhoes	12
Cement /Mortar Mixers	2
Compactors	12
Cranes	4
Excavators	6
Forklifts	2
Generator Sets	6
Graders	2
Sweepers/Scrubbers	10
Welders	4
Water/Vendor Truck	22

1.6 Operation and Maintenance

Operations and maintenance activities, including the frequency of staff visits, maintenance, and shutdowns, would be similar to existing conditions once construction activities are completed. The Inland Feeder, Foothill Pump Station, and all pipelines and structures within the proposed Project Area are unmanned. Any operations and maintenance activities to the Inland Feeder and proposed Project infrastructure would be completed by existing Metropolitan employees.

1.7 Project Approvals

Table 1-3 lists the anticipated permits and approvals which may be required for proposed Project-related activities. The table also lists the types of activities that would be subject to these requirements.

TABLE 1-3
DISCRETIONARY PERMITS AND EASEMENTS POTENTIALLY REQUIRED

Agency	Permits and Authorizations Required	Activities Subject to Regulations
San Bernardino Valley Water Conservation District (SBVWCD)*	Easement and Right-of-Entry Permit	Obtain permanent easement for new vault facility. Access through or use of SBVWCD property.
San Bernardino Valley Municipal Water District (SBVMWD)	Right-of-Entry Permit	Access through or use of SBVMWD property.
California Department of Fish and Wildlife	Fish and Game Code Section 2081 Incidental Take Permit	Take of California Endangered Species Act (CESA) listed species [San Bernardino Kangaroo Rat (*Dipodomys merriami parvus*; SBKR)]
U.S. Fish and Wildlife Service	Federal Endangered Species Act (ESA) Section 7 or Section 10 Incidental Take Permit	Take of ESA listed species [SBKR, Coastal California gnatcatcher (*Polioptila californica californica;* CAGN)]

NOTE:
* Portions of the land currently owned by SBVWCD would be subject to a land exchange with the Bureau of Land Management as described in the Final EIR/Environmental Impact Statement (EIS) and Section 10 HCP for the Upper Santa Ana River Wash Plan and as authorized by the Natural Resources Management Act (S. 47), signed into law March 2019, which included specific guidelines directing the land exchange between the BLM and the Conservation District.

2.0 Initial Study and Environmental Checklist Form

This document is a proposed Initial Study (IS)/Mitigated Negative Declaration (MND), which addresses the potential environmental effects resulting from the proposed Project.

2.1 Legal Authority and Findings

This Initial Study was prepared in accordance with the California Environmental Quality Act (CEQA) Guidelines and relevant provisions of CEQA of 1970, as amended.

Initial Study. Section 15063 of the CEQA Guidelines describes an Initial Study as a preliminary method for analyzing the potential environmental consequences of a project. The purposes of an Initial Study include:

1. Providing the Lead Agency with the necessary information to decide whether to prepare an Environmental Impact Report (EIR) or a Negative Declaration;
2. Enabling the Lead Agency to modify a project during the planning stage by mitigating adverse impacts prior to preparation of CEQA documentation, thus avoiding the need to prepare an EIR; and
3. Providing documentation of the factual basis for the finding in a Mitigated Negative Declaration that the significant environmental impacts of a project have been mitigated to a less-than-significant level.

Negative Declaration or Mitigated Negative Declaration. Section 15070 of the CEQA Guidelines states that a public agency shall prepare a Negative Declaration or Mitigated Negative Declaration for a project subject to CEQA when:

a. The Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment; or
b. The Initial Study identifies potentially significant effects but:
    i. Revisions in the project plans or proposals made by, or agreed to by, the applicant before a proposed Mitigated Negative Declaration and Initial Study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and
    ii. There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

An IS/MND may be used to satisfy the requirements of CEQA when a proposed project would have no significant unmitigable effects on the environment. As discussed further in subsequent sections of this document, implementation of the proposed Project would not result in any significant effects on the environment that cannot be reduced to below the level of significance with the mitigation measures included herein.

2.2 Impact Analysis and Significance Classification

The following sections of this IS/MND provide discussions of the possible environmental effects of the proposed Project for specific resource areas as identified on the CEQA Environmental Checklist Form in Appendix G of the CEQA Guidelines (as updated in December 2018). For each resource area, potential effects are discussed and evaluated.

A "significant effect on the environment" is defined by Section 15382 of the CEQA Guidelines as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by a project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment" but "may be considered in determining whether the physical change is significant."

Following the evaluation of each environmental effect determined to be potentially significant is a discussion of mitigation measures and the residual effects or level of significance remaining after the implementation of the measures.

2.3 Initial Study

1.	**Project Title:**	Inland Feeder – Foothill Pump Station Intertie
2.	**Lead Agency Name and Address:**	The Metropolitan Water District of Southern California 700 North Alameda St Los Angeles, CA 90012
3.	**Contact Person and Phone Number:**	Michelle Morrison, Environmental Planning Section The Metropolitan Water District of Southern California (213) 217-7906
4.	**Project Location:**	Highland, CA (see Figure 1-1)
5.	**Project Sponsor's Name and Address:**	The Metropolitan Water District of Southern California 700 North Alameda St Los Angeles, CA 90012
6.	**General Plan Designation(s):**	Planned Development and Open Space
7.	**Zoning:**	Planned Development/Single Family Residential (PD/R-1) and Open Space (OS)
8.	**Description of Project:**	The proposed Project would construct an intertie, including pipes, valves, and other appurtenances, between Metropolitan's Inland Feeder Pipeline and San Bernardino Valley Municipal Water District's Foothill Pump Station. See Section 1.0, *Project Description*, for more information.
9.	**Surrounding Land Uses and Setting:**	The Project Area is bounded by Greenspot Road and residential development to the north, open space to the south, and large-lot single-family residences and open space to the east and west. See Section 1.3, *Project Location and Land Use*.

10. Other public agencies whose approval is required:	San Bernardino Valley Water Conservation District, San Bernardino Valley Municipal Water District, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service. See Table 1-3.
11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?	Yes, Metropolitan has conducted consultation pursuant to PRC Section 21080.3.1 and has made an impact determination. See Section 3.18, *Tribal Cultural Resources*.

2.4 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	☐ Agriculture and Forestry Resources	☐ Air Quality
☒ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology/Soils	☐ Greenhouse Gas Emissions	☐ Hazards & 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

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial study:

☐ 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.

Jennifer Harriger

Jennifer Harriger
Manager, Environmental Planning Section

05-13-2024

Date

3.0 Evaluation of Environmental Impacts

3.1 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?	☐	☐	☒	☐

Significance criteria established by CEQA Guidelines, Appendix G.

ANALYSIS OF IMPACTS

a. Have a substantial adverse effect on a scenic vista?

Less-Than-Significant Impact. No, the proposed Project would not have a substantial adverse effect on a scenic vista. A scenic vista is defined as a viewpoint that provides panoramic or focused views of a highly valued landscape or scenic resource for the benefit of the general public. The city of Highland is situated at the base of the San Bernardino Mountains; however, the City does not regulate private views (City of Highland 2006a). The proposed Project Area is located on an approximately 10-acre triangular-shaped parcel, immediately south of the intersection of Cone Camp Road and Greenspot Road. The proposed Project would construct a supply and discharge pipeline and associated vault structures, which would be located underground. The proposed Project would also construct four surge tanks that would be approximately 16.5 to 19 feet tall and above ground. However, these structures would not block views or substantially affect a scenic vista. During construction, physical signs of the proposed Project would include the presence of construction equipment, materials, and personnel at staging and access areas, including fencing for safety and security purposes. These areas would be visible to local residents and motorists on nearby roads; however, construction activities would be temporary and would be removed following the end of construction activities. The proposed Project would not result in adverse visual changes to the surrounding area because the proposed Project components would be added within the existing Foothill Pump Station facility. In addition, the proposed Project components would be constructed mainly underground or would be consistent with the visual character of the existing facility. Therefore, impacts would be less than significant.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

No Impact. No, the proposed Project would not substantially damage scenic resources within a State scenic highway. There are no designated State scenic highways near the proposed Project. The nearest eligible State scenic highway is State Route 10 Redlands/ State Route 18, located approximately 2.5 miles south of the proposed Project (Caltrans 2018). Thus, the proposed Project would not be located within or adjacent to a State-designated scenic highway and would not result in damage to scenic resources within a state scenic highway. No impact would occur.

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?

No Impact. No, the proposed Project would not substantially degrade the existing visual character or quality of public views of the proposed Project Area or conflict with applicable zoning or other regulations governing scenic quality. The proposed Project would be located in an urbanized area and would include an intertie connection between the Inland Feeder and Foothill Pump Station through construction of pipelines, vaults, and surge tanks. The proposed Project would be located in an area zoned as Planned Development/Single Family Residential (PD/R-1) and Open Space (OS). The portion of the proposed Project within the PD/R-1 zone would be constructed entirely within the Foothill Pump Station facility. The portion of the proposed Project located outside of the Foothill Pump Station facility would be constructed within an area zoned as OS, and would be constructed below ground within an existing right of way. The proposed Project facilities would not conflict with local zoning or other regulations governing scenic quality, nor would it substantially degrade the existing visual character or quality of public views of the Project Area and its surroundings, and no impact would occur.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less-Than-Significant Impact. No, the proposed Project would not create new sources of substantial light or glare which would adversely affect day or nighttime view in the area. The proposed Project does not propose permanent lighting. While most of the construction would occur during daytime hours, occasional nighttime construction activities may be required to shutdown the Inland Feeder and install the tie-in connection. Temporary construction lighting would be placed at various locations along the proposed Project Area, including construction access points and staging areas.

The proposed Project Area is bounded by Greenspot Road and residential development to the north, a dirt road and open space to the south, and large-lot single-family residences and open space to the east and west. Any nighttime lighting would be located directly in the areas where work is being conducted and would be shielded to prevent light from spilling over into adjacent areas. Construction lights would be removed following the completion of construction activities. As outlined in Appendix A (Metropolitan Standard Practices), floodlights would be directed to shine downward and shielded to avoid a nuisance to the surrounding areas, no lighting would be directed toward a residence or natural areas. No new sources of substantial light or glare are proposed; therefore, impacts would be less than significant.

REFERENCES

California Department of Transportation (Caltrans), 2018. California State Scenic Highway System Map. Available: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed December 14, 2023.

City of Highland, 2006a. General Plan Conservation and Open Space Element. Available: https://www.cityofhighland.org/DocumentCenter/View/148/Conservation-and-Open-Space-Element-PDF, accessed December 14, 2023.

3.2 Agriculture and Forestry 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 Department 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?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

ANALYSIS OF IMPACTS

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?

No Impact. No, the proposed Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use; nor conflict with existing zoning for agricultural, Williamson Act, forest land, or Timberland; nor result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment which could result in conversion of Farmland or forest land to non-agricultural or non-forest use. The proposed Project would be located on an approximately 10-acre triangular-shaped parcel, immediately south of the intersection of Cone Camp Road and Greenspot Road, and would not be located on land identified as Prime or Unique Farmland, or Farmland of Statewide Importance (California Department of Conservation 2023). Furthermore, there are no lands enrolled under the Williamson Act and no forest land or timberland within the proposed Project Area. Therefore, the proposed Project would not convert farmland or forest land to other uses and no impact would occur.

REFERENCES

California Department of Conservation, 2023. California Important Farmland Finder, 2023. Available online at https://www.conservation.ca.gov/dlrp/fmmp. Accessed December 7, 2023.

3.3 Air Quality

Where available, the significance criteria established by the applicable air quality management district 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?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

The following discussion is based on air quality emissions calculations and modeling prepared for the proposed Project and included in Appendix B.

REGULATORY FRAMEWORK

The Southern California area is divided into a number of geographical air basins for the purpose of air quality planning and management.

South Coast Air Basin

The proposed Project Area is located in the South Coast Air Basin (SCAB). The SCAB includes all of Orange County and the non-desert portions of Los Angeles, San Bernardino, and Riverside counties. The South Coast Air Quality Management District (SCAQMD) is the air pollution control agency for the SCAB. The SCAQMD has primary responsibility for regulating stationary sources of air pollution within its jurisdictional boundaries, implementing air quality programs required by state and federal mandates, and enforcing rules and regulations based on air pollution laws.

The federal and state Clean Air Acts mandate the control and reduction of certain air pollutants. Under these laws, the United States Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have established the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for "criteria pollutants" and other pollutants, which are summarized in Table 3.3-1. Some pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere, including carbon monoxide (CO), volatile organic compounds (VOC)/reactive organic gases (ROG),[1] nitrogen oxides (NO_x), particulate matter with diameters of 10 microns or less (PM_{10}) and 2.5 microns or less ($PM_{2.5}$), sulfur dioxide, and lead. Other pollutants are created

[1] CARB defines VOC and ROG similarly as "any compound of carbon excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate," with the exception that VOC are compounds that participate in atmospheric photochemical reactions. For the purposes of this analysis, ROG and VOC are considered comparable in terms of mass emissions, and the term VOC is used in this document.

indirectly through chemical reactions in the atmosphere, such as ozone, which is created by atmospheric chemical and photochemical reactions primarily between VOC and NO_x. Secondary pollutants include oxidants, ozone, and sulfate and nitrate particulates (smog). The local air quality management agency, SCAQMD, is required to monitor air pollutant levels to ensure that the NAAQS and CAAQS are met and, if they are not met, to develop strategies to meet the standards. Depending on whether the standards are met or exceeded, the SCAB is classified as being in "attainment" or "nonattainment." The attainment status of the SCAB for each pollutant regulated by the NAAQS and CAAQS is summarized in Table 3.3-1.

TABLE 3.3-1
AIR QUALITY STANDARDS AND AIR BASIN ATTAINMENT STATUS

Pollutant	Federal Standard (NAAQS)	California Standard (CAAQS)	SCAB Attainment Status
Ozone	0.070 ppm (8-hr average)	0.09 ppm (1-hr average) 0.070 ppm (8-hr average)	Nonattainment (federal and state)
Carbon Monoxide	35.0 ppm (1-hr average) 9.0 ppm (8-hr average)	20.0 ppm (1-hr average) 9.0 ppm (8-hr average)	Attainment (federal) Attainment (state)
Nitrogen Dioxide	0.100 ppm (1-hr average) 0.053 ppm (annual average)	0.18 ppm (1-hr average) 0.030 ppm (annual average)	Attainment (federal) Nonattainment (state)[1]
Sulfur Dioxide	0.075 ppm (1-hr average) 0.5 ppm (3-hr average) 0.14 ppm (24-hr average) 0.030 ppm (annual average)	0.25 ppm (1-hr average) 0.04 ppm (24-hr average)	Unclassified (federal) Attainment (state)
Lead	0.15 µg/m^3 (rolling 3-month average) 1.5 µg/m^3 (calendar quarter)	1.5 µg/m^3 (30-day average)	Nonattainment (federal)[2] Attainment (state)
Particulate Matter (PM_{10})	150 µg/m^3 (24-hr average)	50 µg/m^3 (24-hr average) 20 µg/m^3 (annual average)	Nonattainment (federal and state)[3]
Particulate Matter ($PM_{2.5}$)	35 µg/m^3 (24-hr average) 12 µg/m^3 (annual average)	12 µg/m^3 (annual average)	Nonattainment (federal and state)
Sulfates	No Federal Standards	25 µg/m^3 (24-hr average)	Attainment (state)
Hydrogen Sulfide	No Federal Standards	0.03 ppm (1-hr average)	Unclassified (state)
Vinyl Chloride	No Federal Standards	0.01 ppm (24-hr average)	Unclassified (state)

NOTES:

NAAQS = National Ambient Air Quality Standards; CAAQS = California Ambient Air Quality Standards; SCAB = South Coast Air Basin; ppm = parts per million; hr = hour; µg/m3 micrograms per cubic meter.

1. Only the portion of the SCAB along State Route 60 between U.S. Highway 60 and the western limit of Riverside County is designated nonattainment for nitrogen dioxide CAAQS.
2. Only the Los Angeles County portion of the SCAB is designated nonattainment for lead NAAQS.
3. Only the San Bernardino County portion of the SCAB is designated nonattainment for PM10 CAAQS

SOURCE: CARB 2016 and 2019a through 2019j; USEPA 2021a through 2021g

The SCAQMD has developed air quality management plans (AQMPs) to meet the requirements of the federal Clean Air Act. The most recent plan is the SCAQMD Final 2022 Air Quality Management Plan (SCAQMD 2022). The 2022 AQMP presents a combined state and County strategy (including related mandated elements) to attain the 2015 federal 8-hour ozone standard by August 2038, as required by the federal Clean Air Act Amendments of 1990 and applicable USEPA clean air regulations. San Bernardino County is anticipated to attain the 2015 federal 8-hour ozone standard, using local, state, and federal clean air programs (SCAQMD 2022). This plan addresses various federal nonattainment and

attainment/maintenance planning requirements, is incorporated into the State Implementation Plan by the CARB, and is approved or disapproved by the USEPA.

SCAQMD

The SCAQMD has identified significance thresholds for short-term construction emissions and for long-term operational emissions for criteria air pollutants within its jurisdictional boundaries, as shown in Table 3.3-2.

TABLE 3.3-2
SCAQMD SIGNIFICANCE THRESHOLDS

Thresholds	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Construction Thresholds (pounds per day)	75	100	550	150	150	55
Operational Thresholds (pounds per day)	55	55	550	150	150	55

NOTES:

VOC = volatile organic compounds; NOx = nitrogen oxides; CO = carbon monoxide; SOx = sulfur oxides; PM_{10} = particulate matter with diameters of 10 microns or less; $PM_{2.5}$ = particulate matter with diameters of 2.5 microns or less.

SOURCE: SCAQMD 2023

METHODOLOGY

Air pollutant emissions associated with the proposed Project were estimated using California Emissions Estimator Model (CalEEMod) version 2022.1.1. CalEEMod uses project-specific information, including the project's land uses and location, to estimate a project's emissions. For the purposes of the air quality analysis, construction activities were modeled for the earliest potential time frame to provide for a conservative analysis. If construction is delayed and begins after 2025, the emissions presented in this IS/MND would be conservative, as emissions occurring in future years would be lower than those analyzed herein due to the use of a more energy-efficient and cleaner-burning construction vehicle fleet mix, pursuant to State regulations that require vehicle fleet operators to phase-in less polluting heavy-duty equipment. Construction activities associated with the proposed Project would be limited to Mondays through Fridays, 7:00 a.m. to 4:00 p.m., with occasional work on Saturday. Some nighttime construction may also be required. Construction activities are not expected on Sundays or during federal holidays. Assumptions, including detailed phasing, construction employee vehicles, haul trucks, concrete trucks, and vendor trucks and equipment list and modeling output are included in Appendix B. The proposed Project is a water infrastructure project that would not increase water supply, but rather enhance water delivery flexibility in response to drought conditions. Operations and maintenance activities associated with the proposed Project, including the frequency of Metropolitan employee visits, maintenance, and shutdowns, would be similar to existing conditions once construction activities are completed and would only slightly increase the demand for electricity resources (SCAQMD 1993).[2] The only source of emissions would be associated with periodic vehicle trips by Metropolitan employees for maintenance activities. Due to the minimal emissions that would result from these periodic vehicle trips by Metropolitan employees to the proposed Project Area, no

[2] Criteria pollutant emissions are not required to be estimated for electricity as it is not a source of Project criteria air pollutant emissions as defined by SCAQMD.

operational emissions would be generated at the site that would exceed the SCAQMD's regional operational thresholds. As such, the proposed Project's operational emissions are evaluated qualitatively.

ANALYSIS OF IMPACTS

a. Conflict with or obstruct implementation of the applicable air quality plan?

Less-Than-Significant Impact. No, the proposed Project would not conflict with or obstruct implementation of the applicable air quality plan. The proposed Project would be subject to the SCAQMD 2022 AQMP. A significant air quality impact may occur if a project is not consistent with the applicable AQMP adopted by the SCAQMD or if it would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan.

The proposed Project must comply with CARB and/or the USEPA-mandated mobile source emissions regulations outlined in the applicable AQMPs. These regulations are related to on-road vehicle emissions standards, off-road equipment fleet standards, and fuel sulfur standards. The proposed Project would result in temporary construction activities and does not include permanent stationary emissions sources regulated by the SCAQMD. Therefore, regulations pertaining to permanent stationary emission sources do not apply to the proposed Project. Construction industry jobs generally have no regular place of business, as construction employees commute to job sites throughout the region, which may change throughout the year. Moreover, these jobs would be temporary in nature, generally lasting up to the duration of proposed Project construction, which would take approximately 12 months to complete, occurring over a 31-month period, with a break in between two construction stages (see Section 1.5.1*, Schedule*, for additional details).

The AQMP also includes control strategies applicable to short-term emissions from construction activities. The proposed Project would be required to comply with the CARB Airborne Toxic Control Measures that limits heavy-duty diesel motor vehicle idling to no more than 5 minutes at any given location with certain limited exceptions defined in the regulation for equipment in which idling is integral to the function of the equipment or activity (such as concrete trucks and concrete pouring) as seen in Section 2485 in Title 13 of the California Code of Regulations (CCR) (Title 13 CCR, Section 2485). In addition, contractors would be required to comply with required CARB In-Use Off-Road Diesel Vehicle Regulation to use lower-emitting equipment in accordance with the phased-in compliance schedule for equipment fleet operators (Title 13 CCR, Section 2449). In addition, with respect to temporary construction emission sources, such as fugitive dust, the proposed Project would comply with all applicable SCAQMD rules and regulations, such as Rule 403, which ensures that fugitive dust emissions are reduced. Additionally, as discussed in Appendix A (Metropolitan Standard Practices), the Project Contractor(s) would be required to comply with Metropolitan standard practices related to air pollution control and dust control, including the submittal of a Dust Control Plan, the use of water trucks in construction areas, and implementation of the Best Available Control Measures listed in Table 1 of the SCAQMD Rule 403, and that off-road diesel-fueled construction equipment greater than 25 horsepower (hp) shall be compliant with federally mandated clean diesel engines (USEPA Tier 4 Final), as outlined in the construction contractor specifications. Furthermore, as detailed in Section 3.3 (*b)*, below, the projected construction emissions for criteria pollutants would not exceed the SCAQMD's regional significance thresholds for construction activities.

The proposed Project would be located on an approximately 10-acre parcel (see Section 1.0, *Project Description*, for additional details). The proposed Project Area spans 6.615 acres of the 10-acre parcel. The proposed Project is a water infrastructure project that would not increase water supply, but rather would enhance water delivery flexibility in response to drought conditions and limited SWP allocations. Metropolitan is proposing an intertie connection between the Inland Feeder and Foothill Pump Station and would not otherwise directly or indirectly cause growth. As described above, operations and maintenance activities would be similar to existing conditions once construction activities are completed and would only slightly increase the demand for electricity resources.[3] The only source of emissions would be associated with periodic vehicle trips by Metropolitan employees for maintenance activities and the proposed Project would not increase the number of Metropolitan employees required for operations and maintenance activities. Therefore, the proposed Project would not conflict with or obstruct the applicable 2022 AQMP. Impacts would be less than significant.

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?

Less-Than-Significant Impact. No, the proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the proposed Project region is in nonattainment under an applicable federal or State ambient air quality standard. The proposed Project would generate short-term construction-related emissions through the use of construction equipment and vehicles, grading and the disturbance of soil materials, and transport of construction employees and materials to and from the work site. Travel on unpaved surfaces and processing of soil material would produce fugitive dust. As mentioned above, with respect to temporary construction emission sources, such as fugitive dust, the proposed Project would comply with all applicable SCAQMD rules and regulations, such as Rule 403, which ensures that fugitive dust emissions are reduced. Additionally, as discussed in Appendix A (Metropolitan Standard Practices), the Project Contractor(s) would be required to comply with Metropolitan standard practices related to air pollution control and dust control, including the submittal of a Dust Control Plan, the use of water trucks in construction areas and implementation of the Best Available Control Measures listed in Table 1 of the SCAQMD Rule 403, and that off-road diesel-fueled construction equipment greater than 25 hp shall be compliant with federally mandated clean diesel engines (USEPA Tier 4 Final), as outlined in the construction contractor.

The SCAQMD has quantified thresholds of significance for short-term construction emissions for criteria air pollutants within the SCAB, as described above in Table 3.3-2. The SCAQMD recommends that projects with construction-related emissions that exceed any of the identified emission thresholds be considered as potentially significant air quality impacts. The construction emissions associated with the proposed Project and the applicable emissions thresholds are presented in Table 3.3-3.

[3] Criteria pollutant emissions are not required to be estimated for electricity as it is not a source of Project criteria air pollutant emissions as defined by SCAQMD.

TABLE 3.3-3
MAXIMUM REGIONAL CONSTRUCTION EMISSIONS (POUNDS PER DAY)[A]

Source	VOC	NO_X	CO	SO_X	PM_{10}[b]	$PM_{2.5}$[b]
Supply Connection Components						
Pipeline Trenching and Installation	0.48	7.10	11.55	0.03	3.41	0.55
Vault Structure Excavation	0.17	3.42	7.66	0.02	1.92	0.29
Vault Structure Installation	0.45	7.46	12.25	0.04	4.96	0.73
Surge Tank Excavation	0.15	2.56	7.18	0.01	0.99	0.16
Surge Tank Installation	0.53	8.48	16.78	0.04	4.85	0.73
Discharge Connection Components						
Pipeline Trenching and Installation	0.54	9.12	13.17	0.04	5.88	0.88
Vault Structure Excavation	0.16	3.56	7.73	0.02	2.14	0.32
Vault Structure Installation	0.43	7.30	12.15	0.04	4.84	0.72
Surge Tank Excavation	0.23	4.48	8.84	0.02	3.17	0.47
Surge Tank Installation	0.52	8.65	16.62	0.04	4.85	0.73
Maximum Daily Emissions	**0.54**	**9.12**	**16.78**	**0.04**	**5.88**	**0.88**
Significance Thresholds	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No

NOTES:

a. Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B.
b. Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA 2024

As shown in Table 3.3-3 the maximum daily construction emissions generated by the proposed Project's worst-case construction scenario would not exceed SCAQMD's daily significance threshold for any of the criteria pollutants. Therefore, the proposed Project's construction emission impacts would be less than significant, and no mitigation is required.

As discussed above, operational activities associated with the proposed Project would be similar to existing conditions and would only slightly increase the demand for electricity resources.[4] The only source of emissions would be associated with periodic vehicle trips by Metropolitan employees for maintenance activities and the proposed Project would not increase the number of Metropolitan employees required for operations and maintenance activities. Therefore, once construction is complete, the proposed Project would result in minimal operational emissions associated with maintenance, and would not result in a cumulatively considerable net increase of any criteria pollutant. Impacts would be less than significant.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less-Than-Significant Impact. No, the proposed Project would not expose sensitive receptors to substantial pollutant concentrations. Sensitive receptors are land uses that are considered more sensitive to air pollutants than typical receptors. Schools, hospitals, residential uses, and convalescent homes are

[4] Criteria pollutant emissions are not required to be estimated for electricity as it is not a source of Project criteria air pollutant emissions as defined by SCAQMD.

considered sensitive receptors. As stated above, the proposed Project Area spans 6.61 acres of a 10-acre parcel. The nearest sensitive receptors to the proposed Project Area are single-family residences located approximately 30 feet and 275 feet to the west past Weaver Street, a single-family residence approximately 40 feet to the east along Cone Camp Road, and single-family residences located approximately 250 feet to the north across Greenspot Road.

The localized construction air quality analysis was conducted using the methodology prescribed in the SCAQMD Final Localized Significance Threshold (LST) Methodology (SCAQMD 2008). The screening criteria provided in the Final LST Methodology were used to determine localized construction emissions thresholds for the proposed Project. The localized significance thresholds are applicable to NO_X, CO, PM_{10}, and $PM_{2.5}$. For NO_X and CO, the thresholds are based on the ambient air quality standards. For PM_{10} and $PM_{2.5}$, the thresholds are based on requirements in SCAQMD Rule 403 (Fugitive Dust) for construction and Rule 1303 (New Source Review Requirements) for operations. The SCAQMD has established screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards without project-specific dispersion modeling. The screening criteria depend on: (1) the area in which the project is located, (2) the size of the project area, and (3) the distance between the project area and the nearest sensitive receptor.

SCAQMD's Methodology clearly states that "off-site mobile emissions from the proposed Project should not be included in the emissions compared to LSTs." Therefore, for purposes of the LST analysis, only on-site emissions were considered, including emissions from heavy-duty construction equipment and on-site truck travel. The closest existing sensitive receptors to the proposed Project's construction area are located approximately 30 feet to the west of the proposed Project Area. The LST used for the localized significance impact analysis were conservatively based on a 5-acre project construction area in the Central San Bernardino Valley Source-Receptor Area (SRA 34) and based on the SCAQMD screening criteria for sensitive receptors located within 25 meters away (SCAQMD 2008).[5,6]

The maximum daily localized emissions for each of the construction components and the localized significance thresholds are presented in Table 3.3-4. The same phasing and equipment assumptions, including compliance with SCAQMD Rule 403, were used as for the regional emissions calculations discussed above.

[5] Appendix C of the SCAQMD *Final Localized Significance Threshold Methodology* (2008) provides screening levels at distances of 25, 50, 100, 200, and 500 meters. Interpolation between distances is permissible; however, for ease of calculation and to provide a conservative analysis, the 25-meter distance is used, which is equivalent to approximately 82 feet. Because actual sensitive receptors are located approximately 30 feet from the Project's construction area, the 25-meter distance was used since the SCAQMD, Final Localized Significance Threshold Methodology, suggests "Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.", June 2003 and revised July 2008, p. 33.

[6] Using the screening criteria applicable for a 5-acre site is conservative because the localized significance thresholds are project site dependent, and the allowable thresholds increase with increasing project size. Therefore, using a 5-acre site threshold instead of the Project area's full 6.615 acres yields a more stringent analysis.

TABLE 3.3-4
MAXIMUM LOCALIZED CONSTRUCTION EMISSIONS (POUNDS PER DAY)[A]

Source	NO_X	CO	PM_{10}[b]	$PM_{2.5}$[b]
Supply Connection Components				
Pipeline Trenching and Installation	4.89	9.36	2.69	0.34
Vault Structure Excavation	1.99	6.44	1.50	0.17
Vault Structure Installation	4.18	9.92	4.09	0.48
Surge Tank Excavation	1.87	6.34	0.76	0.09
Surge Tank Installation	5.34	14.27	3.99	0.48
Discharge Connection Components				
Pipeline Trenching and Installation	5.19	9.61	4.73	0.55
Vault Structure Excavation	2.02	6.47	1.69	0.18
Vault Structure Installation	4.15	9.90	3.98	0.47
Surge Tank Excavation	2.15	6.57	2.43	0.26
Surge Tank Installation	5.37	14.29	3.99	0.48
Maximum Daily Emissions	**5.37**	**14.29**	**4.73**	**0.55**
Significance Thresholds	270.0	1746.0	14.0	8.0
Significant Impact?	No	No	No	No

NOTES:

a. Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B.
b. Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.
c. The SCAQMD LSTs are based on Source Receptor Area 34 (Central San Bernardino Valley) for a 5-acre site with sensitive receptors conservatively assumed to be located within 25 meters (approximately 82 feet) away from the construction area.

SOURCE: ESA 2024

As shown in Table 3.3-4 above, the proposed Project's maximum localized construction emissions would be below the localized screening thresholds for NO_X, CO, PM_{10}, and $PM_{2.5}$ for the closest air quality sensitive receptors are the single-family residential uses located west of the proposed Project Area approximately 30 feet away. Therefore, the proposed Project would not expose sensitive receptors to substantial pollutant concentrations during construction and impacts would be less than significant.

Operations and maintenance activities for the proposed Project would be similar to existing conditions once construction activities are completed and would only slightly increase the demand for electricity resources.[7] The only source of emissions would be associated with periodic vehicle trips by Metropolitan employees for maintenance activities. The proposed Project would not increase the number of Metropolitan employees required for operations and maintenance activities. Therefore, once construction is complete, the proposed Project would result in minimal operational emissions associated with maintenance, and would not expose sensitive receptors to substantial pollutant concentrations during operations, and impacts would be less than significant.

[7] Criteria pollutant emissions are not required to be estimated for electricity as it is not a source of Project criteria air pollutant emissions as defined by SCAQMD.

CO Hotspots

A CO hotspot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. CO decreased dramatically in the SCAB with the introduction of the automobile catalytic converter in 1975. No exceedances of CO have been recorded at monitoring stations in the SCAB in recent years and the SCAB is currently designated as a CO attainment area for both the CAAQS and NAAQS. As discussed below, it is not expected that CO levels at proposed Project-impacted intersections would rise to such a degree as to cause an exceedance of these standards.

Proposed Project construction would result in temporary additional construction employee vehicles and truck trips to the proposed Project Area but the additional vehicles and trips would cease after construction, which would take approximately 12 months to complete, occurring over a 31-month period, with a break in between two construction stages (see Section 1.5.1, *Schedule*, for additional details). The proposed Project would construct an intertie connection between the Inland Feeder and Foothill Pump Station consisting of pipelines, vaults, and surge tanks. As explained above, the proposed Project would not increase water supply and would not otherwise directly or indirectly cause growth beyond the AQMP growth projections. The proposed-Project Area is not within an area with poor circulation or heavy traffic. Therefore, Project-related construction would not cause or contribute to potential temporary CO hotspots, and construction activities would not expose sensitive receptors to substantial concentrations of carbon monoxide. Impacts would be less than significant.

Operations and maintenance activities associated with the proposed Project would be similar to existing conditions once construction activities are completed and would only slightly increase the demand for electricity resources.[8] The only source of emissions would be associated with periodic vehicle trips by Metropolitan employees for maintenance activities and the proposed Project would not increase the number of Metropolitan employees required for operations and maintenance activities. Therefore, once construction is complete, the proposed Project would result in minimal operational emissions associated with maintenance activities. Therefore, Project-related operations and maintenance activities would not cause or contribute to potential temporary CO hotspots, and would not expose sensitive receptors to substantial concentrations of carbon monoxide. Impacts would be less than significant.

Toxic Air Contaminants (TACs)

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, automotive repair facilities, and dry-cleaning facilities. The proposed Project would not include any of these potential sources. Temporary TAC emissions associated with diesel particulate matter (DPM) emissions from heavy construction equipment would occur during construction activities. According to Office of Environmental Health Hazard Assessment and SCAQMD's Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis (SCAQMD 2003), health effects from TACs are described in terms of individual cancer risk based on a lifetime (i.e., 70-year) resident exposure duration. Given the temporary construction schedule of approximately 12 months to complete, occurring over a 31-month period, with a break in between two

[8] Criteria pollutant emissions are not required to be estimated for electricity as it is not a source of Project criteria air pollutant emissions as defined by SCAQMD.

construction stages (see Section 1.5.1*, Schedule*, for additional details), the proposed Project would not result in a long-term (i.e., lifetime or 70-year) exposure as a result of construction activities.

The emissions modeling analysis presented in Section 3.3 *(b)*, above, provides for a conservative assessment of the proposed Project's construction activities by assuming construction at the earliest time frame, which assumes the use of the most conservative emission factors. Furthermore, the analysis assumes heavy-duty equipment usage for each day of the various construction components. In reality, not all equipment would necessarily be used over the whole of the construction period, they may be used for individual construction components or sub-components with some equipment used only periodically. In addition, the proposed Project would be consistent with the applicable 2022 AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. The proposed Project would comply with the CARB Airborne Toxic Control Measures that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these CARB regulations would minimize emissions of TACs during construction. Based on the short-term duration of proposed Project construction and compliance with regulations that would minimize emissions, construction of the proposed Project would not expose sensitive receptors to substantial TAC concentrations, and impacts would be less than significant.

As noted above, operations and maintenance activities, including the frequency of staff visits, maintenance, and shutdowns, would be similar to existing conditions once construction activities are completed and would only slightly increase the demand for electricity resources.[9] The only source of emissions would be associated with periodic vehicle trips by Metropolitan employees for maintenance activities and the proposed Project would not increase the number of Metropolitan employees required for operations and maintenance activities. In addition, maintenance and employee trucks would be subject to the five-minute regulatory idling limitation and proposed Project trucks would be required to comply with the applicable provisions of the CARB 13 CCR, Section 2025 (Truck and Bus regulation) to minimize and reduce PM and NO_X emissions from existing diesel trucks. Therefore, proposed Project operations would not be considered a substantial source of diesel particulates and proposed Project operations would only result in minimal emissions of TAC from maintenance activities. Based on expected use, potential long-term operational impacts associated with the release of TACs would be minimal, regulated, and controlled. Therefore, operation and maintenance activities associated with the proposed Project would not expose sensitive receptors to substantial TAC concentrations, and impacts would be less than significant.

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

No Impact. No, the proposed Project would not result in other emissions, such as those leading to odors, adversely affecting a substantial number of people. During construction activities, emissions would result from the use of construction equipment and vehicles, grading and the disturbance of soil materials, and architectural coatings, solvents, and transport of employees and materials to and from the work site. While these emissions may generate temporary odors, they would be limited to the construction period and would not be noticeable beyond the proposed Project boundaries. Operations and maintenance activities for the Metropolitan facility would not change from existing conditions, and would include few maintenance trips,

[9] Criteria pollutant emissions are not required to be estimated for electricity as it is not a source of Project criteria air pollutant emissions as defined by SCAQMD.

which would not emit new emissions, such as odors, which would be noticeable at the nearest residence. Therefore, no impact would occur.

REFERENCES

SCAQMD (South Coast Air Management District), November 1993. CEQA Air Quality Handbook. Accessed April 3, 2024. Available: https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993).

SCAQMD (South Coast Air Management District), 2003. Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis. Accessed April 3, 2024. Available: https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.aqmd.gov%2Fdocs%2Fdefault-source%2Fceqa%2Fhandbook%2Fmobile-source-toxics-analysis.doc%3Fsfvrsn%3D2&wdOrigin=BROWSELINK.

SCAQMD(South Coast Air Management District), 2008. Final Localized Significance Threshold Methodology. Accessed April 3, 2024. Available: https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2.

SCAQMD(South Coast Air Management District), 2022. Final 2022 Air Quality Management Plan. Accessed April 3, 2024. Available: https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16.

SCAQMD(South Coast Air Management District), 2023. South Coast AQMD Air Quality Significance Thresholds. Accessed April 3, 2024. Available: south-coast-aqmd-air-quality-significance-thresholds.pdf

3.4 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, regulations or by the California Department of Fish and Game or U.S. 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?	☐	☒	☐	☐

Significance criteria established by CEQA Guidelines, Appendix G.

Regulated or sensitive biological resources studied and analyzed herein include special-status plant and wildlife species, nesting birds and raptors, sensitive plant communities, jurisdictional waters and wetlands, wildlife movement, and locally protected resources, such as protected trees. The following discussion is based on a Biological Resources Assessment prepared for the proposed Project and included in Appendix C. The Biological Resources Assessment documents the existing biological conditions of the proposed Project Area and evaluates the potential for impacts to biological resources during construction of the proposed Project. Operations and maintenance activities at the Foothill Pump Station facility would be similar to existing conditions once construction activities are completed and would not result in impacts to biological resources; therefore, operations will not be discussed further in this section.

REGULATORY FRAMEWORK

The following is a summary of the regulatory context under which biological resources are managed at the federal, state, and local levels. Many federal and state statutes provide a regulatory structure that

guides the protection of biological resources. Agencies with the responsibility for protection of biological resources include:

- Regional Water Quality Control Board (RWQCB) (waters of the State);
- United States Fish and Wildlife Service (USFWS) (federally listed species and migratory birds); and;
- California Department of Fish and Wildlife (CDFW) (fish and wildlife resources of the State, riparian areas and other waters of the State, state-listed species).

Listed species are those taxa that are formally listed as endangered or threatened by the federal government (e.g., USFWS), pursuant to the Federal Endangered Species Act (FESA) or as endangered, threatened, or rare (for plants only) by the State of California, pursuant to the California Endangered Species Act (CESA) or the California Native Plant Protection Act. Species are also considered rare under CEQA if they are not formally listed but exist in such small numbers throughout a significant portion of their range that they may become endangered if their environment worsens or are likely to become endangered throughout all or a significant portion of their range.

California Fish and Game Code Section 2081 allows CDFW the authority to authorize take of species listed as endangered, threatened, candidate, or a rare plant in the State of California, if that take is incidental to otherwise lawful activities and if certain conditions are met.

Migratory birds, including raptors and passerines (perching birds), are protected under the federal Migratory Bird Treaty Act (MBTA). The MBTA makes it illegal to take, possess, buy, sell, purchase, or barter any migratory bird listed in 50 Code of Federal Regulations Part 10, including feathers or other parts, nests, eggs, or products, unless authorized under a permit. California Fish and Game Code Sections 3505, 3503.5, 3511, 3513, and 3800 prohibit the take, possession, or destruction of birds, their nests, or eggs with limited exceptions.

Sensitive habitats are vegetation types, associations, or sub-associations that support concentrations of special-status plant or wildlife species, are of relatively limited distribution, or are of particular value to wildlife.

Chapter 8.36 of the City of Highland Municipal Code prevents the removal, relocation, or destruction of any heritage tree within City of Highland's city limits without proper tree removal permit and associated environmental review (Chapter 8.36, Heritage Trees). Section 8.36.020 of the City of Highland Municipal Code defines heritage trees as any tree that meets the following criteria:

A. All woody plants in excess of 15 feet in height and having a single trunk circumference of 24 inches or more, as measured four and one-half feet above ground level; or
B. Multi-trunk tree(s) having a total circumference of 30 inches or more, measured four and one-half feet from ground level; or
C. A stand of trees, the nature of which makes each dependent upon the others for survival; or
D. Any other tree as may be deemed historically or culturally significant by the community development director or designee because of size, condition, location, or aesthetic qualities.

The definition of historic landmark includes any tree designated as an historic landmark by city council action. Trees which bear fruit or nuts (with the exemption of trees planted in a grove) and trees planted,

grown, and/or held for sale by licensed nurseries and/or tree farms are exempt from the provisions of the City's code.

Tree removal is defined by the City's code as an act which will cause a heritage tree to die, as determined by a tree expert, including, acts that inflict damage upon root systems, bark or other parts of tree by fire, application of toxic substances or operation of equipment or machinery, improper watering, changing the natural grade of the drip line area around the trunk, or attachment of signs or artificial material piercing the bark of the tree by means of nails, spikes, or other piercing objects. A Tree Removal Permit is required for the removal of all heritage trees within the city limits. In addition to a Tree Removal Permit, a Landmark Alteration Permit is required for the removal of all trees designated as historic landmarks. The permit requirement may be waived in the case that the tree is determined to be a public health, safety, and welfare concern. Chapter 16.64.040 (Heritage Tree Preservation Requirements) further outlines the requirements of this provision, including the protection of existing trees. No trees are proposed to be removed or impacted during project activities.

Chapter 16.64.050 (Riparian Plant Conservation) establishes regulations to promote healthy and abundant riparian habitats within the City of Highland and works alongside existing regulations enforced by CDFW. This ordinance generally prohibits the removal of any riparian vegetation within 25 feet of the dripline of riparian vegetation adjacent to a "blueline stream" as indicated by the USGS Quadrangle (topographic map) or identified as a protected riparian area in a community or specific plan. The removal of any vegetation within 25 feet of the drip line of riparian vegetation along a blueline stream requires a tree removal permit and shall be subject to environmental review. The provisions of this section apply to both private and public lands within the City limits, with exceptions for emergency flood control operations and authorized water conservation measures established and authorized by an appropriate independent special district with such responsibility. No riparian vegetation is proposed to be removed during project activities.

METHODOLOGY

Biological conditions were evaluated by confirming applicable regulations, policies, and standards; reviewing biological literature and querying available databases pertinent to the proposed Project Area and vicinity including CDFW's California Natural Diversity Data Base (CNDDB) (CDFW 2023a), CDFW's California Sensitive Natural Communities List (CDFW 2023b), CNPS's Inventory of Rare and Endangered Vascular Plants of California (CNPS 2023), Natural Resource Conservation Service's (NRCS) Web Soil Survey (NRCS 2023), USFWS's Critical Habitat Portal (USFWS 2023a), USFWS's National Wetland Inventory (USFWS 2023b); and conducting a reconnaissance-level biological survey of the proposed Project Area. Refer to the Biological Resources Assessment for a full list of reviewed literature (Appendix C). The reconnaissance-level biological resources survey was conducted within the 59.96-acre Study Area, which includes the approximately 6.61-acre proposed Project Area and a 500-foot buffer area surrounding the proposed Project Area.

On December 22, 2023, a reconnaissance-level biological survey of the proposed Project Area was conducted by ESA. The survey was performed by walking meandering transects throughout the proposed Project Area to document existing site conditions and the potential presence of regulated biological resources, including special-status plant and wildlife species, sensitive plant communities, jurisdictional waters and wetlands, and habitat for nesting birds. Weather conditions were overcast with temperatures at 64 (degrees Fahrenheit) with variable winds ranging from 0 to 7 miles per hour.

Additional surveys have been conducted within the general proposed Project Area since 2022, including a focused San Bernardino kangaroo rat (*Dipodomys merriami parvus*) presence/absence trapping survey conducted by ECORP in 2022 (ECORP 2022), a San Bernardino kangaroo rat burrow survey conducted by ESA in 2023 (ESA 2023a), and small mammal nighttime activity survey conducted by ESA in 2023 (ESA 2023b). The results of these additional surveys were integral to refining the understanding of potential impacts to special-status biological resources.

EXISTING BIOLOGICAL CONDITIONS

The proposed Project Area includes a portion of an existing fenced and graded triangular property that encompasses the Metropolitan and SBVMWD facilities. Existing dirt access roads occur along the western and southern extent of the proposed Project Area, with remnant California buckwheat – brittle bush scrub habitat interspersed between the existing graded roads. The surrounding Study Area, which includes the proposed Project Area and a 500-foot buffer around the proposed Project Area, is bounded by Greenspot Road and residential development to the north, a dirt road and open space to the south, and large-lot single-family residences and open space to the east and west.

Topography and Soils

Topography within the Study Area generally slopes from east to west and soils consist of alluvium derived from granite. The majority of the Study Area is mapped as Soboba stony loamy sand, 2-9% slopes, which consists of stony loamy sand 0–10 inches, very stony loamy sand 10–24 inches, and very stony sand 24–60 inches. Hanford coarse sandy loam, 2-9% slopes was mapped in the northern portion of the Study Area outside of the proposed Project Area and consists of sandy loam 0–12 inches and fine sandy loam 12–60 inches.

Existing Vegetation and Land Cover Types

Natural communities and land cover types mapped within the Study Area include annual grasses and forbs, brittle bush scrub, disturbed brittle brush scrub, California buckwheat – brittle bush scrub, disturbed California buckwheat – brittle bush scrub, chamise chaparral – hairy yerba santa scrub, disturbed chamise chaparral – brittle bush scrub, hairy yerba santa scrub, mustard fields, developed, and disturbed. However, the proposed Project Area is dominated by developed land cover (5.84 acres) within the triangular fenced area, followed by disturbed land cover (0.40 acre) comprised of existing dirt roads, and California buckwheat – brittle bush scrub (0.37 acre) within the southern portion of the Study Area. The Study Area is mapped by CDFW as occurring within the Riversidean alluvial fan sage scrub habitat with a State rank of S1.1. However, the Riversidean alluvial fan sage scrub habitat indicator species, scale broom (*Lepidospartum squamatum*), was not observed as a dominant species within any of the observed natural communities. Only one scale broom individual was observed within the Study Area, but outside of the proposed Project Area. Therefore, none of the natural communities present within the Study Area meet the criteria for Riversidean alluvial fan sage scrub. As a result, and based on review of CDFW's California Sensitive Natural Communities List, no sensitive natural communities were mapped within the Study Area.

Observed Plant and Wildlife Species

Common plant species identified within the Study Area include California buckwheat (*Eriogonum fasciculatum*), deerweed (*Acmispon glaber*), brittlebush (*Encelia farinosa*), California sagebrush (*Artemisia californica*), yerba santa (*Eriodictyon* sp.), black mustard (*Brassica nigra*), cheeseweed mallow (*Malva*

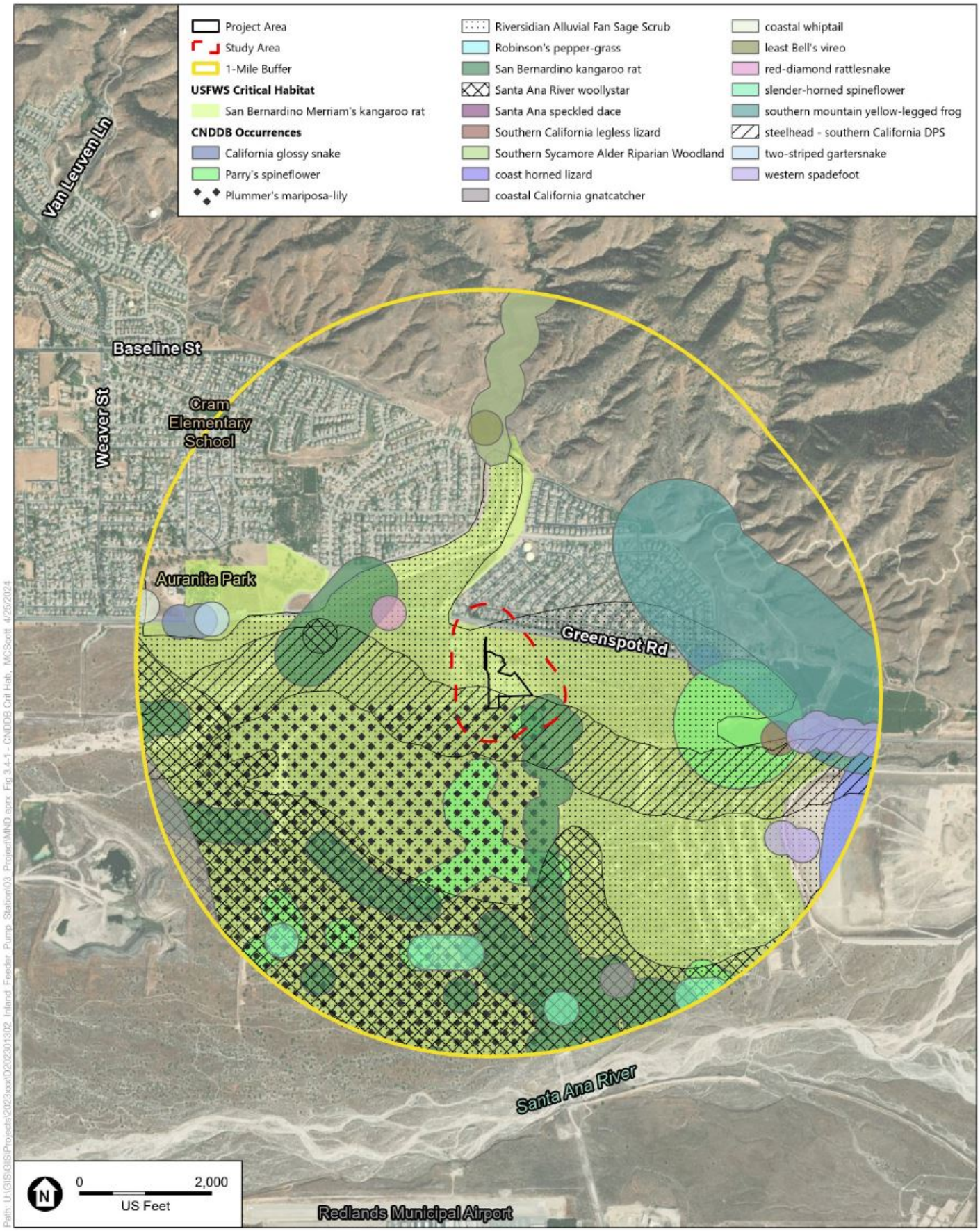
paviflora), filaree (*Erodium* spp.), oat (*Avena* spp.), and bromes (*Bromus* spp.). Common wildlife species detected within the Study Area during the site visit, include Eurasian collared dove (*Streptopelia decaocto*), mourning dove (*Zenaida macroura*), common raven (*Corvus corax*), house finch (*Haemorhous mexicanus*), Bewick's wren (*Thryomanes bewickii*), yellow-rumped warbler (*Setophaga coronata*), black phoebe (*Sayornis nigricans*), California towhee (*Melozone crissalis*), and white-crowed sparrow (*Zonotrichia leucophrys*). Additionally, two listed and two non-listed special-status wildlife species were present during the site assessment or previous studies conducted within the Study Area: coastal California gnatcatcher (*Polioptila californica californica*; federally threatened [FT], CDFW species of special concern [SSC]); San Bernardino kangaroo rat (*dipodomys merriami parvus*; federally endangered [FE], state endangered [SE], SSC); coastal western whiptail (*Aspidoscelis tigris* ssp. *stejnegeri*; SSC); and northwestern San Diego pocket mouse (*Chaetodipus fallax* ssp. *fallax*; CDFW special animal [SA]).

Special-Status Plant and Wildlife Species with Potential to Occur

Special-status species are legally protected under the state and federal ESAs or other regulations or are considered sufficiently rare by the scientific community to qualify for such listing. These species are classified under the following categories:

- Species listed or proposed for listing as threatened or endangered or are candidates for possible future listing as threatened or endangered, under the FESA or the CESA.
- Species that meet the definitions of rare or endangered under State CEQA Guidelines Section 15380.
- Plants considered by the CNPS to be rare, threatened, or endangered (Rank 1A, 1B, 2A, and 2B plants) in California.
- Plants considered by the CNPS to be plants about which more information is needed and plants of limited distribution (Rank 3 and 4 plants) that may be significant locally and are recommended for consideration under CEQA.
- Plants listed as rare under the California Native Plant Protection (Fish and Game Code 1900 et seq.).
- Wildlife designated by CDFW as species of special concern, CDFW Watch List species, or have a state rank of S1-S3 on CDFW's Special Animals List (CNDDB 2024).
- Wildlife "fully protected" in California (Fish and Game Code [FGC] Sections 3511, 4700, and 5050).
- Bird species protected by the MBTA.
- Bat species considered priority by the Western Bat Working Group (WBWG).

A query of the CDFW California Natural Diversity Database (CNDDB), the CNPS Inventory of Rare and Endangered Plants, and the USFWS Information for Planning and Consultation Online System was conducted to identify special-status species that have been previously recorded in the Redlands USGS 7.5-minute quadrangle and eight surrounding quadrangles including San Bernardino North, Harrison Mtn, Keller Peak, Yucaipa, El Casco, Sunnymead, Riverside East, and San Bernardino South. A list of plant and wildlife species detected during biological studies conducted by ESA in 2023 are provided in the respective technical report in Appendix C. A map depicting the results of the CNDDB and USFWS Critical Habitat database queries is provided in Appendix C and shown on Figure 3.4-1 (CDFW 2023a, USFWS 2023a).



SOURCE: ESA, 2024

Inland Feeder - Foothill Pump Station Intertie Project

Figure 3.4-1
CNDDB and Critical Habitat Map

ESA

The potential for special-status wildlife species to occur within the Study Area is based on vegetation and habitat quality, topography, elevation, soils, surrounding land uses, habitat preferences and geographic ranges.

- **Low Potential:** The Study Area supports limited habitat for a particular species. For example, the appropriate vegetation assemblage may be present while the substrate preferred by the species may be absent.
- **Moderate Potential:** Marginal habitat for a particular species may exist. For example, the habitat may be heavily disturbed and/or may not support all stages of a species' life cycle; or may not fit all preferred habitat characteristics; however, still supports important components, such as a particular soil or community type.
- **High Potential:** The Study Area provides suitable habitat conditions for a particular species and/or known populations occur in the immediate vicinity.
- **Present:** The species was observed within the Study Area during the biological resources assessment.

Special-Status Plants

Based on the condition of the vegetation and habitats that were characterized during the site visit, it was determined that five special-status plant species have a moderate or high potential to occur within the California buckwheat – brittle bush scrub habitat within the proposed Project Area, as well as within the natural communities within the surrounding Study Area: Plummer's mariposa lily (*Calochortus plummerae*; California Rare Plant Rank [CRPR] 4.2), Parry's spineflower (*Chorizanthe parryi* var. *parryi*; CRPR 1B.1), slender-horned spineflower (*Dodecahema leptoceras*; FE, SE, CRPR 1B.1), Santa Ana River woollystar (*Eriastrum densifolium* ssp. *sanctorum*; FE, SE, CRPR 1B.1), and Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*; CRPR 4.3) (Appendix C). All of these species have the potential to occur within the coastal sage scrub and chaparral habitats mapped within the Study Area (i.e., brittle bush scrub, disturbed brittle bush scrub, California buckwheat – brittle bush scrub, disturbed California buckwheat – brittle bush scrub, chamise chaparral – hairy yerba santa scrub, disturbed chamise chaparral – brittle bush scrub, and hairy yerba santa scrub). Additionally, Plummer's mariposa lily has the potential to occur within the annual grasses and forbs habitat mapped in the Study Area.

Special-Status Wildlife

In addition to the four special-status wildlife species observed within the Study Area (coastal California gnatcatcher, San Bernardino kangaroo rat, coastal western whiptail, and northwestern San Diego pocket mouse), a total of 16 special-status wildlife species were determined to have a moderate to high potential to occur within the Study Area, including: Crotch bumble bee (*Bombus crotchii*; state candidate as endangered [SCE]), western spadefoot (*Spea hammondii*; federal candidate as threatened [FCT], SSC), Southern California legless lizard (*Anniella stebbinsi*; SSC), California glossy snake (*Arizona elegans occidentalis*; SSC), Belding's orange-throated whiptail (*Aspidoscelis hyperythra beldingi*; CDFW watch list [WL]), red-diamond rattlesnake (*Crotalus ruber*; SSC), coast horned lizard (*Phrynosoma blainvillii*; SSC), Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*; WL), Bell's sparrow (*Artemisiospiza belli belli*; WL), burrowing owl (*Athene cunicularia*; USFWS birds of conservation concern [BCC], SSC), California horned lark (*Eremophila alpestris actia*; WL), loggerhead shrike (*Lanius ludovicianus*; SSC), San Diego black-tailed jackrabbit (*Lepus californicus bennettii*; SA), San Diego desert

woodrat (*Neotoma lepida intermedia*; SSC), southern grasshopper mouse (*Onychomys torridus ramona*; SSC), and Los Angeles pocket mouse (*Perognathus longimembris brevinasus*; SSC) (Appendix C).

Critical Habitat

Pursuant to Section 4(a)(3) and (b)(2) of the FESA, the USFWS is required to designate critical habitat for endangered and threatened species to the extent feasible. Critical habitat includes areas of land, water, and air space containing the physical and biological features essential for the survival and recovery of endangered and threatened species, and is defined as (1) areas within the geographic range of a species that are occupied by individuals of that species and contain the primary constituent elements (PCEs; physical and biological features) essential to the conservation of the species; thus, warranting special management consideration or protection, and (2) areas outside of the geographic range of a species at the time of listing but that are considered essential to the conservation of the species. Designated critical habitat includes sites for breeding and rearing, movement or migration, feeding, roosting, cover, and shelter that are essential to the survival and recovery of the species, whether the habitat is currently occupied by the species or not. Designated critical habitats require special management and protection of existing resources, including water quality and quantity, host animals and plants, food availability, pollinators, sunlight, and specific soil types.

The entire proposed Project Area and the majority of the Study Area, aside from the residential development to the north, is located within designated Critical Habitat Unit 1 (Santa Ana River Wash) for San Bernardino kangaroo rat (USFWS 2023a, 2008). The California buckwheat – brittle bush scrub habitat within the proposed Project Area, as well as the brittle bush scrub, disturbed brittle bush scrub, California buckwheat – brittle bush scrub, disturbed California buckwheat – brittle bush scrub, chamise chaparral-hairy yerba santa scrub, and disturbed chamise chaparral – hairy yerba santa scrub habitats within the surrounding Study Area provide suitable habitat for San Bernardino kangaroo rat.

Wildlife Movement

Migration corridors are navigable pockets or strips of land that connect larger tracts of open space together, allowing them to function as a greater habitat complex. These "passages" can exist on a small scale, allowing wildlife to pass through or under an otherwise uninhabitable area including a roadway, housing development, or city through drainage culverts, green belts and waterways; or on a larger scale, providing an opportunity for wildlife to skirt large topographical features (e.g., mountains, lakes, streams) by utilizing adjacent canyons, valleys and upland swaths when migrating.

The majority of the developed portion of the proposed Project Area is bordered by chain-link fencing. Rural residential development surrounds the proposed Project Area to the north, east, and west, likely deterring wildlife movement through the proposed Project Area. The land surrounding the proposed Project Area to the south is undeveloped land in which wildlife likely utilizes to forage and breed, and to some extent, travel locally and regionally. Numerous species of birds, reptiles, invertebrates, and small mammals would be expected in the Study Area, as well as larger mammals such as the coyote (*Canis latrans*), striped skunk (*Mephitis mephitis*), raccoon (*Procyon lotor*), and grey fox (*Urocyon cinereoargenteus*), who likely utilize the area for hunting and movement. While the proposed Project Area provides some refuge for wildlife, it does not provide linkages to other habitats and is not expected to function as an important migration corridor.

Aquatic Features

Although a formal aquatic resources delineation was not conducted as part of the biological field reconnaissance, five aquatic resource features (Features 1 through 5) were identified within the Study Area (Figure 3.4-2) (Appendix C). Only one feature, Feature 1, occurs within the proposed Project Area, the remaining four aquatic resource features identified during the site visit occur within the surrounding Study Area, outside of the proposed Project Area. None of these features support wetland and/or riparian habitat.

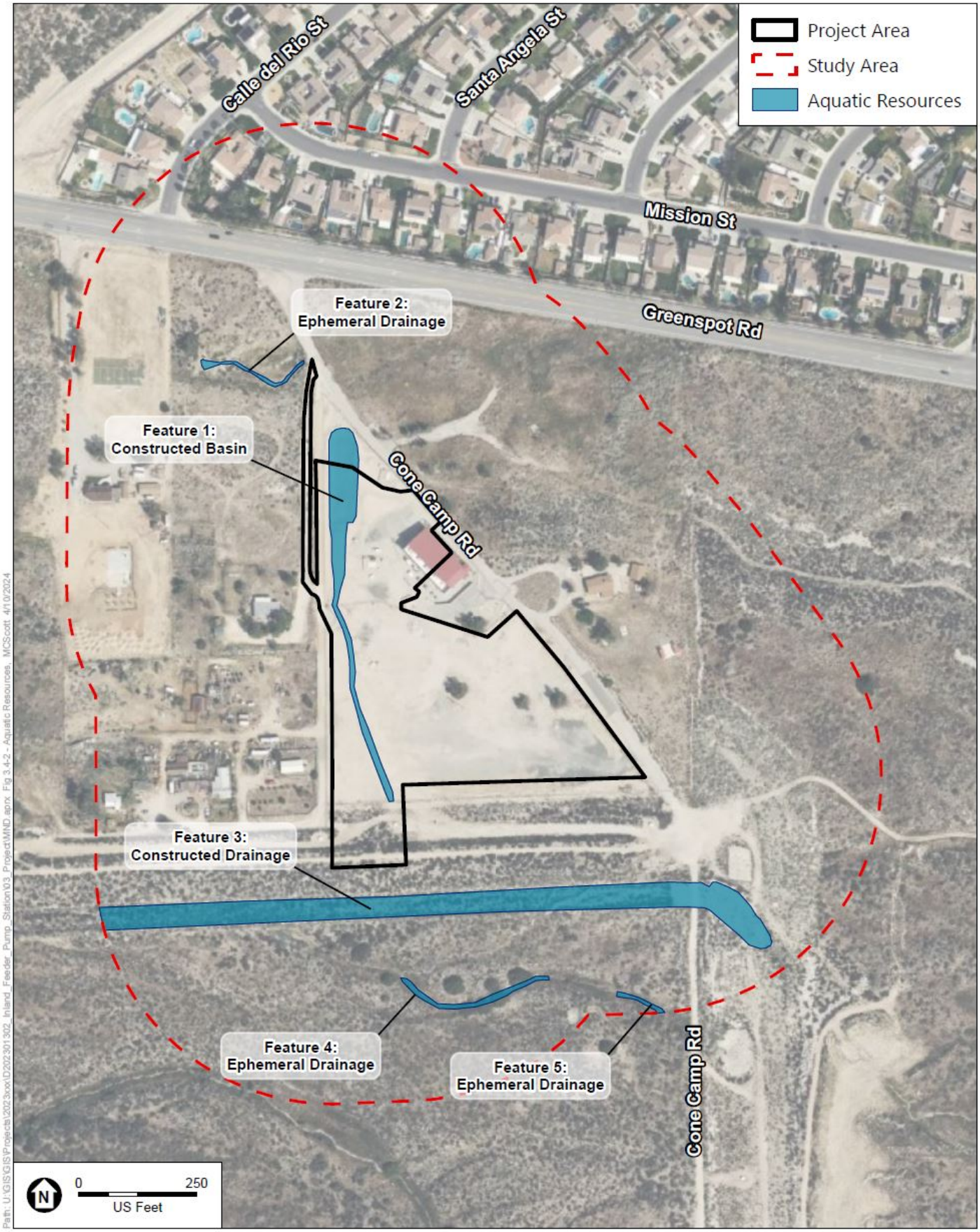
Feature 1: Constructed Basin. Feature 1 consists of a constructed basin and ephemeral drainage located within the western portion of the proposed Project Area. This feature is unvegetated and situated in an upland area. The drainage appears to capture surface water runoff flowing from the existing road that runs from south to north across Metropolitan's fee parcel. This road appears to capture surface water runoff flowing from the existing access road and functions as an unintended stormwater pathway due to its regular use. As a result, concentrated stormwater flows along the road, ultimately draining northward into the constructed basin located on the northwestern extent of the proposed Project Area.

Feature 2: Ephemeral Drainage. Feature 2 is an ephemeral drainage located within the northern portion of the Study Area just west of the northernmost corner of the proposed Project Area and is dominated by upland vegetation (California buckwheat – brittle bush scrub). This drainage receives and captures surface water runoff from the surrounding landscape and flows westward for approximately 245 feet before dissipating into the ground. Surface flows are confined to the Study Area due to higher elevations on the neighboring property, which acts as a natural barrier preventing the flow from continuing or connecting with any other aquatic features downstream.

Feature 3: Constructed Drainage. Feature 3 is a constructed drainage within the southern portion of the Study Area (south of the proposed Project Area and north of Features 4 and 5). It is dominated by upland vegetation including California buckwheat – brittle bush scrub, with an individual sandbar willow (*Salix exigua*) and a couple of mulefat (*Baccharis salicifolia*) individuals identified within the eastern portion of the drainage. The constructed drainage is located in an upland area and receives flows through a culvert located at the easternmost extent of the feature where it is connected to a large, constructed basin located outside of the Study Area. The water travels east to west through the constructed drainage during high flows, and converges with Plunge Creek approximately 0.67 mile west of the Study Area, and ultimately connecting to the Santa Ana River west of I-210.

Feature 4: Ephemeral Drainage. Feature 4 is an ephemeral drainage located within the southern portion of the Study Area and outside of the proposed Project Area. This ephemeral drainage is comprised of upland vegetation, specifically chamise chaparral-hairy yerba santa scrub. Feature 4 dissipates into the ground at its western extent and does not appear to connect with any other aquatic features at its downstream extent.

Feature 5: Ephemeral Drainage. Feature 5 is an ephemeral drainage located within the southern portion of the Study Area and outside of the proposed Project Area. It contains upland vegetation, specifically hairy yerba santa scrub. Based on aerial review, Features 4 and 5 appear to have once formed a single, ephemeral aquatic feature. However, recent disturbances in the area have caused a separation, severing the connection between them. Consequently, due to the surrounding higher elevation, drainage from this feature dissipates into the ground at its western extent.



SOURCE: ESA, 2024

Inland Feeder - Foothill Pump Station Intertie Project

Figure 3.4-2
Aquatic Resources

ESA

ANALYSIS OF IMPACTS

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?

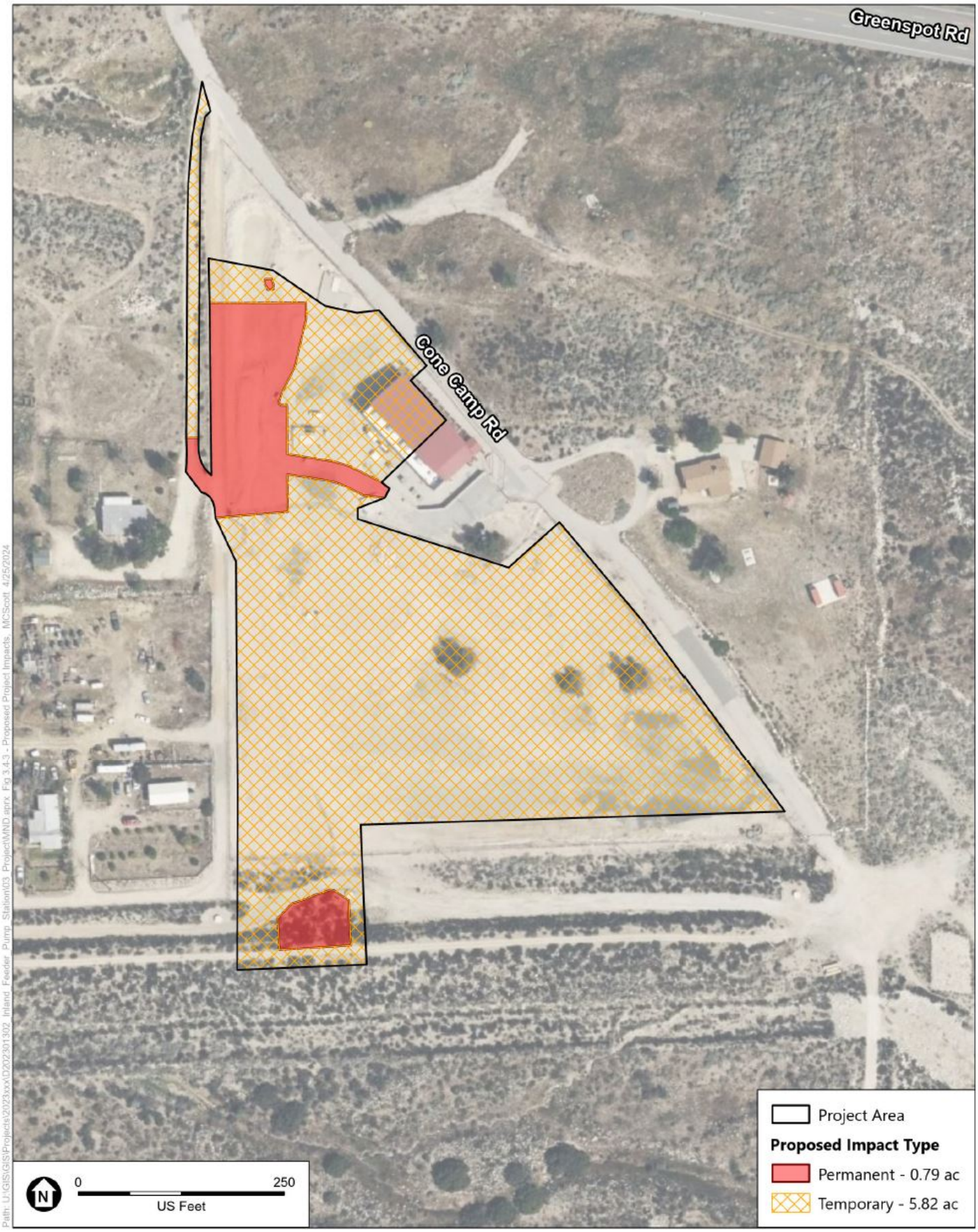
Less-Than-Significant Impact with Mitigation Incorporated. No, the proposed Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

Special-Status Plants

The proposed Project would result in 5.82 acres of total temporary and 0.79 acre of total permanent impacts within the Project Area (Figure 3.4-3). The Study Area provides suitable habitat for five special-status plant species, including Parry's spineflower (CRPR 1B.1), Plummer's mariposa lily (CRPR 4.2), Robinson's pepper-grass (CRPR 4.3), Santa Ana River woollystar (FE, SE, CRPR 1B.1), and slender-horned spineflower (FE, SE, CRPR 1B.1) (Appendix C). While these five special-status plants have the potential to occur within the coastal sage scrub and chaparral habitats mapped in the Study Area (i.e., brittle bush scrub, disturbed brittle bush scrub, California buckwheat – brittle bush scrub, disturbed California buckwheat – brittle bush scrub, chamise chaparral – hairy yerba santa scrub, disturbed chamise chaparral – brittle bush scrub, and hairy yerba santa scrub), Plummer's mariposa lily also has the potential to occur within the annual grasses and forbs habitat mapped in the Study Area.

The proposed Project would result in the permanent removal of 0.12 acre and temporary removal of 0.25 acre of California buckwheat – brittle bush scrub habitat within the Project Area. In areas where excavation and soil disturbance would occur within the proposed Project Area, direct or indirect impacts to special-status plants or their seed banks could occur. Direct impacts could result from vegetation removal and soil disturbance, while indirect impacts could result from increased fugitive dust, erosion, increased run-off, trampling of vegetation outside of construction areas, and/or introduction of invasive plants.

Metropolitan would implement Standard Practices, as outlined in Appendix A, which requires that environmental permits be attained prior to construction, construction activities remain within designated construction limits, construction staff are trained of potential special-status biological resources prior to construction, hazardous materials are contained, implementation of best management practices, and compliance with requirements of the General Construction Activity Stormwater Permit issued by the State Water Resources Control Board (which outlines measures to control stormwater runoff and erosion, thereby minimizing potential indirect impacts on nearby vegetation from increased runoff or erosion). Implementation of **Mitigation Measure BIO-2,** requiring focused plant surveys and the preparation and implementation of a dedicated salvage, seed collection, and replanting plan if special-status plants are observed on-site would avoid and/or minimize impacts to special-status plants. Implementation of **Mitigation Measure BIO-3,** outlining mitigation replacement requirements, would further reduce potential impacts to special-status plants to less than significant. Therefore, impacts to special-status plants would be less than significant with mitigation incorporated.



SOURCE: ESA, 2024

Inland Feeder - Foothill Pump Station Intertie Project

Figure 3.4-3
Proposed Project Impacts

Special-Status Wildlife

While the proposed Project Area is compacted and surrounded by graded roads, providing limited suitable habitat to support special-status wildlife species, the surrounding Study Area supports and provides potentially suitable habitat for special-status wildlife species (Appendix C). Two listed and two non-listed special-status wildlife species were present during the site assessment conducted in 2023 or previous studies conducted within the Study Area: coastal California gnatcatcher (FT, SSC); San Bernardino kangaroo rat (FE, SE, SSC); coastal western whiptail (SSC); and northwestern San Diego pocket mouse (SA). Although not observed on-site during the site assessment or during previous studies, the Study Area also provides suitable habitat to support an additional 16 special-status wildlife species including: Crotch bumble bee (SCE); western spadefoot (FCT, SSC); Belding's orange-throated whiptail (WL); California glossy snake (SSC); coast horned lizard (SSC); red-diamond rattlesnake (SSC); Southern California legless lizard (SSC); Bell's sparrow (WL); burrowing owl (BCC, SSC); California horned lark (WL); loggerhead shrike (SSC); Southern California rufous-crowed sparrow (WL); Los Angeles pocket mouse (SSC); San Diego black-tailed jackrabbit (SA); San Diego desert woodrat (SSC); and southern grasshopper mouse (SSC). Special-status wildlife species and/or their habitat within proposed construction areas (i.e., excavation, trenching, material installation, and grading) would be subject to direct impacts such as vegetation removal, soil disturbance, and potential injury to individuals. Additionally, special-status wildlife species located near direct impact areas could potentially be subject to indirect impacts including increased noise, vibration, human activity, erosion, and fugitive dust. These factors could temporarily disrupt wildlife behavior and/or damage suitable habitat for these species. Impacts and mitigation for special-status wildlife species are discussed in greater detail below.

Nesting and Foraging Birds/Raptors and Special-Status Birds

Six special-status avian species (Bell's sparrow, burrowing owl, California horned lark, coastal California gnatcatcher, loggerhead shrike, and Southern California rufous-crowned sparrow) were present or have a moderate or high potential to nest and/or forage within the Study Area. Suitable habitat for these species occurs within the annual grasses and forbs, brittle bush scrub, disturbed brittle bush scrub, California buckwheat – brittle bush scrub, disturbed California buckwheat – brittle bush scrub, chamise chaparral-hairy yerba santa scrub, disturbed chamise chaparral – hairy yerba santa scrub, and hairy yerba santa scrub habitats, as well as the disturbed land cover type, within the Study Area. The proposed Project Area is heavily compacted and provides very limited suitable foraging habitat along its southern boundary. Additionally, there is ample, suitable foraging habitat present in the surrounding area, which would not be impacted by the proposed Project activities. Thus, the temporary loss of up to 0.25 acre and permanent loss of up to 0.12 acre of potentially suitable foraging habitat due to the proposed Project activities is not considered a likely adverse impact to Bell's sparrow, California horned lark, loggerhead shrike, and Southern California rufous-crowned sparrow if present during construction. Coastal California gnatcatcher and burrowing owl have additional requirements and are discussed in detail below. In addition, Metropolitan would implement Standard Practices (Appendix A), such as limiting the area of disturbance. Impacts to foraging habitat for Bell's sparrow, California horned lark, loggerhead shrike, and Southern California rufous-crowned sparrow would be less than significant.

The Study Area provides suitable nesting habitat for a variety of native resident and migratory bird and raptor species protected under the federal Migratory Bird Treaty Act of 1918 (MBTA) and Sections 3503.5, 3505, and 3511 of the California Fish and Game Code, including the special-status avian species mentioned

above (Appendix C). The proposed Project (i.e., vegetation removal and construction activities) may result in direct and/or indirect impacts to these migratory bird and raptor species through the removal of active nests or disruption of breeding/nesting behavior, such as copulation, nest building, or incubation if present during construction activities. Implementation of Metropolitan's Standard Practices outlined in Appendix A requires a Worker Environmental Awareness Program (WEAP) training and clear demarcation of proposed Project limits, and implementation of best management practices during proposed Project construction. In addition, implementation of **Mitigation Measure BIO-1**, requiring prevention of inadvertent entrapment, and **Mitigation Measure BIO-4**, requiring the implementation of a preconstruction nesting bird survey and establishment of an avoidance buffer around active nests, would ensure that impacts to nesting birds would be avoided and/or minimized. Therefore, impacts to nesting birds and raptors would be less than significant.

Coastal California Gnatcatcher

As determined in the Biological Resources Report (Appendix C), the Study Area supports suitable coastal sage scrub habitat for coastal California gnatcatcher. A coastal California gnatcatcher individual was visually and audibly identified approximately 250 feet south of the proposed Project Area within the California buckwheat – brittle bush scrub habitat in the southern portion of the Study Area during the site visit and has the potential to nest and/or forage within suitable coastal sage scrub habitat (i.e., brittle bush scrub, disturbed brittle bush scrub, California buckwheat – brittle bush scrub, disturbed California buckwheat – brittle bush scrub, chamise chaparral-hairy yerba santa scrub, disturbed chamise chaparral – hairy yerba santa scrub, and hairy yerba santa scrub habitats) within the Study Area. While the proposed Project Area contains limited coastal sage scrub habitat (e.g., California buckwheat – brittle bush scrub habitat) suitable for coastal California gnatcatcher, impacts to this habitat could be significant if occupied. Ground disturbance and vegetation removal activities may result in "take" of this species through the disruption of breeding/nesting behavior (such as copulation, nest building, or incubation) and through the removal of occupied habitat for this species. Metropolitan would implement its Standard Practices as outlined in Appendix A, which requires obtaining required permits prior to construction, delineation of construction boundaries, implementation of best management practices, and WEAP training during proposed Project construction. Implementation of **Mitigation Measure BIO-1**, requiring prevention of inadvertent entrapment, and **Mitigation Measure BIO-4**, requiring a preconstruction nesting bird survey, would avoid and /or minimize impacts. In addition, implementation of **Mitigation Measure BIO-3**, outlining mitigation replacement requirements, would further reduce potential direct and indirect impacts to coastal California gnatcatcher to a less than significant level. Therefore, impacts to coastal California gnatcatcher would be less than significant with mitigation incorporated.

Crotch Bumble Bee

Crotch bumble bee has the potential to forage and/or nest within the California buckwheat – brittle bush scrub habitat in the southern portion of the proposed Project Area and may use all the natural communities, aside from the disturbed and developed land cover types, for nesting and foraging within the remainder of the Study Area. Ground disturbance and vegetation clearing activities may result in direct and indirect impacts to this species through the removal of the species' preferred plants for nectaring and removal of nest burrows. Metropolitan would implement Standard Practices as outlined in Appendix A, which provides general avoidance and minimization measures, including the development and implementation of a WEAP, demarcation of proposed Project limits, and best management practices. Implementation of **Mitigation**

Measure BIO-5, which requires conducting preconstruction surveys and includes restoration requirements, would avoid and/or minimize impact. In addition, implementation of **Mitigation Measure BIO-3,** which outlines mitigation replacement requirements, would reduce potential impacts to Crotch bumble bee to less than significant. Therefore, impacts to Crotch bumble bee would be less than significant with mitigation incorporated.

Western Spadefoot

Western spadefoot may use small mammal burrows within the California buckwheat – brittle bush scrub habitat in the southern portion of the proposed Project Area and all the natural communities, aside from the disturbed and developed land cover types, for aestivating and foraging within the remainder of the Study Area. This species is not expected to use the proposed Project Area for breeding since it is disturbed and there are limited suitable breeding pools present. If present, ground disturbance and vegetation clearing activities may result in direct impacts to aestivating toads. Potential indirect impacts from human presence, noise, and/or ground vibration generated by heavy equipment or adjacent construction activities may affect western spadefoot toads. Metropolitan would implement their Standard Practices as outlined in Appendix A, which provides general avoidance and minimization measures, demarcation of proposed Project limits, hazardous waste containment, and hydrologic requirements, along with the implementation of preconstruction clearance surveys. In addition, implementation of **Mitigation Measure BIO-1**, requiring prevention of inadvertent entrapment, and **Mitigation Measure BIO-6**, requiring avoidance/exclusion measures, monitoring, and relocation, would avoid and/or minimize impacts. Therefore, impacts to western spadefoot would be less than significant.

San Bernardino Kangaroo Rat

The Study Area supports potentially occupied San Bernardino kangaroo habitat and occurs within designated critical habitat (Critical Habitat Unit 1: Santa Ana River Wash) for San Bernardino kangaroo rat (Appendix C). San Bernardino kangaroo rat was identified within the southern portion of the proposed Project Area during a protocol-level presence/absence trapping survey conducted for this species within the Study Area in 2022 (ECORP 2022). Additionally, suitable kangaroo rat burrows were mapped in the proposed Project Area in 2023 and kangaroo rat species were identified in the southern portion of the proposed Project Area during a nighttime small mammal activity survey conducted in 2023 (ESA 2023a, 2023b). Thus, San Bernardino kangaroo rat may burrow, forage, and breed within the brittle bush scrub, disturbed brittle bush scrub, California buckwheat – brittle bush scrub, disturbed California buckwheat – brittle bush scrub, chamise chaparral – hairy yerba santa scrub, and disturbed chase chaparral – hairy yerba santa scrub habitats within the Study Area, including the California buckwheat – brittle bush scrub habitat within the southern portion of the proposed Project Area. Ground disturbance and vegetation removal activities may result in "take" of this species through the removal of a nest or burrows, injury, or mortality. Indirect impacts may result from human presence, ground vibration and noise generated by heavy equipment, increased predation, and artificial lighting.

Metropolitan would implement their Standard Practices outlined in Appendix A, including obtaining all required permits prior to construction, the development and implementation of a WEAP, demarcation of proposed Project limits, best management practice, and lighting restrictions, which would reduce impacts to San Bernardino kangaroo rat. Additionally, the implementation of **Mitigation Measure BIO-1**, requiring prevention of inadvertent entrapment, **Mitigation Measure BIO-3**, establishing mitigation requirements for impacts to listed species, **Mitigation Measure BIO-7**, requiring pre-construction presence/absence

trapping surveys, **Mitigation Measure BIO-8**, requiring implementation of exclusionary fencing, and **Mitigation Measure BIO-9**, requiring San Bernardino kangaroo rat monitoring, would reduce potential impacts to San Bernardino kangaroo rat to less than significant. Therefore, impacts to San Bernardino kangaroo rat would be less than significant with mitigation incorporated.

Special-Status Ground Dwelling Wildlife

Belding's orange-throated whiptail, California glossy snake, coast horned lizard, coastal western whiptail, Los Angeles pocket mouse, northwestern San Diego pocket mouse, red-diamond rattlesnake, San Diego black-tailed jackrabbit, San Diego desert woodrat, Southern California legless lizard, and southern grasshopper mouse may occupy annual grasses and forbs, California buckwheat – brittle bush scrub, chamise chaparral – hairy yerba santa scrub, and/or hairy yerba santa scrub habitat, including disturbed areas, of the proposed Project Area and surrounding Study Area. Although the proposed Project Area is heavily compacted and provides very limited suitable habitat for these species along its southern boundary, the proposed Project may result in direct impact to these species through injury or mortality or the removal of a nest burrow/den. Indirect impacts may result from human presence, ground vibration and noise generated by heavy equipment, and increased predation. Metropolitan would implement their Standard Practices outlined in Appendix A, including the development and implementation of a WEAP, demarcation of proposed Project limits, containment of hazardous materials, best management practices, and lighting restrictions, which would reduce impacts to special-status ground dwelling wildlife. In addition, **Mitigation Measure BIO-1**, requiring prevention of inadvertent entrapment, and **Mitigation Measure BIO-10**, requiring preconstruction survey and trapping/relocation methods, would avoid and/or minimize potential impacts to special-status ground dwelling wildlife species. Therefore, impacts to special-status ground dwelling wildlife species would be less than significant.

Burrowing Owl

No burrowing owls were observed within the Study Area during the site assessment conducted in 2023 or previous studies conducted within the Study Area. However, focused burrowing owl surveys were not conducted, and suitable foraging and nesting habitat is present throughout the annual grasses and forbs and disturbed scrub habitats within the Study Area. Suitable ground squirrel burrows were observed but lacked burrowing owl sign (i.e., freshly excavated dirt, prey remains, whitewash, or nest material). This species has been previously observed in the San Bernardino International Airport approximately 4.1 miles west of the proposed Project Area (CNDDB 2023a). If present, breeding or wintering burrowing owls may be impacted by direct injury or mortality or indirectly affected from human presence or ground vibration and noise generated by heavy equipment. The implementation of Metropolitan's Standard Practices outlined in Appendix A, including the development and implementation of a WEAP, demarcation of proposed Project limits, construction monitoring, and implementation of best management practices, on-site overnight storage requirements, trash/debris removal, and maintaining required speed limits, would reduce potential impacts to burrowing owl. Additionally, implementation of **Mitigation Measure BIO-1**, requiring prevention of inadvertent entrapment and **Mitigation Measure BIO-11**, requiring preconstruction surveys and monitoring, would avoid and/or minimize potential impacts to burrowing owl. Therefore, impacts to burrowing owl would be less than significant.

Additionally, as discussed in Appendix A, the Project Contractor(s) would be required to comply with Metropolitan Standard Practices for related biological resources, including standard practices for applicable avoidance and minimization requirements (i.e., WEAP trainings, hazardous material containment, and

lighting restrictions). In addition, implementation of **Mitigation Measures BIO-1** through **BIO-11** would reduce potential impacts to special-status species to less than significant. Therefore, impacts would be less than significant with mitigation incorporated.

Mitigation Measures

BIO-1: Prevention of Inadvertent Entrapment. To prevent inadvertent entrapment of common and special-status wildlife during construction, all excavated, steep-walled holes or trenches more than 2 feet deep shall be covered with tarp, plywood or similar materials at the close of each working day and shall be inspected visually to confirm animals would be excluded, to prevent animals from being trapped. Ramps may be constructed of earth fill or wooden planks within deep walled trenches to allow animals to escape, if necessary. Before such holes or trenches are backfilled, they should be thoroughly inspected for trapped animals. If trapped wildlife is observed, escape ramps or structures will be installed immediately to allow escape.

BIO-2: Special-Status Plants. Prior to construction activities that could potentially remove special-status plants, a qualified botanist shall conduct a pre-construction floristic inventory and focused rare plant survey to determine and map the location and extent of special-status plant species populations within disturbance areas within suitable habitat. This survey shall occur during the typical blooming periods of special-status plants with the potential to occur: Parry's spineflower (*Chorizanthe parryi* var. *parryi*; CRPR 1B.1; blooming period April – June), Plummer's mariposa lily (*Calochortus plummerae*; CRPR 4.2; blooming period May – July), Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*; CRPR 4.3; blooming period January – July), Santa Ana River woollystar (*Eriastrum densifolium* ssp. *sanctorum*; FE, SE, CRPR 1B.1; blooming period April – September), and slender-horned spineflower (*Dodecahema leptoceras*; FE, SE, CRPR 1B.1; blooming period April–June). The plant survey shall follow the CDFW Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW 2018).

If special-status plants are not identified within the proposed Project Area, then ground-disturbing activities may commence. If special-status plants are detected and Project-related impacts are unavoidable, then the preparation and implementation of a special-status species salvage, seed collection, and replanting plan would be required, and consultation with the regulatory agencies would be required to address potential take of listed plant species. The salvage, seed collection, and replanting plan shall include measures to salvage, collect seed, replant, and monitor the disturbance area until native vegetation is re-established.

Pre-construction special-status plant surveys are scheduled to be conducted in 2024. If construction does not begin by 2027, a qualified botanist shall conduct an additional pre-construction floristic inventory and focused rare plant survey in accordance with the guidance above during the appropriate blooming period the year prior to the commencement of proposed Project activities.

BIO-3: Compensation for Impacts to Federally and State-Listed Plant and Wildlife Species Habitat. Direct temporary and permanent impacts to suitable habitat for federally or state-listed species shall be mitigated through purchase of credits from an approved mitigation bank, payment to an in-lieu fee program, or in another form of mitigation approved by the regulatory agencies.

Temporary Impacts. Mitigation for direct temporary impacts to suitable habitat for federally or state-listed species shall be provided through on-site restoration. Areas temporarily impacted shall be returned to similar conditions to those that existed prior to grading and/or ground-disturbing activities.

Permanent Impacts. Metropolitan shall purchase credits from an approved mitigation bank, payment to an in-lieu fee program, or in another form of mitigation approved by the regulatory agencies to compensate for all permanent loss of suitable habitat for federally or state-listed species (including critical habitat), if available, at a 1:1 ratio.[10]

BIO-4: Nesting Birds/Raptors and Special-Status Birds. Proposed Project activities could negatively impact nesting birds that are protected in accordance with the MBTA and FGC, as well as other special-status avian species, such as the Bell's sparrow, burrowing owl, California horned lark, coastal California gnatcatcher, loggerhead shrike, and Southern California rufous-crowned sparrow. No physical disturbance of vegetation, operational structures, buildings, or other potential habitat (e.g., open ground, gravel, construction equipment or vehicles, etc.) that may support nesting birds protected by the MBTA and FGC shall occur in the breeding season, except as necessary to respond to public health and safety concerns, or otherwise authorized by the Engineer. The breeding season extends from February 15 through August 31 for passerines and general nesting and from January 1 through August 31 for raptors.

- If nesting habitat (including annual grasses and forbs, brittle bush scrub, California buckwheat – brittle bush scrub, chamise chaparral – hairy yerba santa scrub, and hairy yerba santa scrub habitats, as well as the disturbed land cover types within the Study Area) must be cleared or proposed Project activities must occur within 500 feet of nesting habitat within the breeding season as defined above, a qualified biologist shall perform a nesting bird survey no more than three days prior to clearing or removal of nesting habitat or start of proposed Project activities. Surveys will be performed in all Metropolitan accessible areas (fee property and easements) and inaccessible areas will be visually surveyed to their full extent without trespassing.
- If active nests for sensitive species, raptors and/or migratory birds are observed, an adequate buffer zone or other avoidance and minimization measures, as appropriate, shall be established, as identified by a qualified biologist and approved by the Engineer. Construction avoidance buffers are generally 300 feet for non-listed passerines and 500 feet for listed avian species (i.e., coastal California gnatcatcher) and raptors; however, avoidance buffers may be modified at the discretion of the biologist, depending on the species, location of the nest and species tolerance to human presence and construction-related noises and vibrations. The buffer shall be clearly marked in the field by the Contractor, as directed by the Engineer, and construction or clearing shall not be conducted within this zone until the young have fledged and are no longer reliant on the nest.
- Additional measures may include (but are not limited to): construction avoidance until the nest is no longer active, noise attenuation measures to reduce construction noise levels to below 60 dBA Leq (an hourly measurement of A-weighted decibels) or ambient (if existing ambient levels are above 60 dBA), and biological monitoring during construction activities to ensure the species is not harmed during proposed Project implementation.
- A qualified biologist shall monitor active nests or nesting bird habitat within or immediately adjacent to the proposed Project construction areas, and the Engineer shall provide necessary recommendations to the Contractor to minimize or avoid impacts to protected nesting birds.

[10] Any 'take' of federally listed species' occupied habitat shall be addressed through either the Section 7 or Section 10(a)(1)(B) process under the federal Endangered Species Act (ESA) of 1973, as amended. Additionally, direct impacts to federally designated critical habitat that cannot be avoided shall be addressed through either the ESA Section 7 or Section 10(a)(1)(B) process. Any 'take' of state-listed species shall be addressed through the California Fish and Game Code Section 2081(b) incidental take permit process. The two permits and authorization by the agencies with jurisdiction over these resources may require additional measures (e.g., avoidance, conservation, etc.) beyond what is being proposed under this CEQA analysis.

BIO-5: Crotch Bumble Bee. If removal of suitable Crotch bumble bee foraging and/or nesting habitat within the California buckwheat – brittle bush scrub is required, the following measures shall be implemented:

- A qualified entomologist familiar with the species' behavior and life history shall conduct surveys to determine presence/absence of the Crotch bumble bee within the year prior to vegetation removal and/or grading in areas that provide suitable habitat for this species. A minimum of three surveys, ideally 2-4 weeks apart, should also be conducted during peak flying season when the species is most likely to be detected above ground, between March 1 to September 1 and during peak bloom of nectaring resources (Thorp et al. 1983; CDFW 2023c). At minimum, a survey report should provide the following:
    - A description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch bumble bee.
    - Field survey conditions that should include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched.
    - Map(s) showing the location of nests/colonies.
    - A description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, should include native plant composition (e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species).
- If Crotch bumble bee is detected, the qualified entomologist should identify the location of all nests within and adjacent to the proposed Project Area. A 15-meter (50-foot) no disturbance buffer zone should be established around any identified nest(s) to reduce the risk of disturbance or accidental take. A qualified entomologist should expand the buffer zone as necessary to prevent disturbance or take.
- If Crotch bumble bee impacts cannot be feasibly avoided, Metropolitan would obtain appropriate take authorization from CDFW (pursuant to FGC, § 2080 et seq), and replace habitat at a 1:1 ratio, or as determined in consultation with CDFW.

BIO-6: Western Spadefoot. Although limited suitable breeding habitat is present within the constructed basin and associated drainage located in the proposed Project Area, proposed Project activities could negatively impact suitable western spadefoot upland habitat, including all of the natural communities and excluding the disturbed and developed land cover, within the small mammal burrows located in the proposed Project Area. Therefore, the following measures are required to avoid impacts to this species.

- A qualified biologist shall survey areas of suitable habitat for western spadefoot in the proposed Project Area, including ruts, small pools, and the constructed basin and associated drainage. The survey shall be conducted during the active season of western spadefoot (which corresponds with the rainy season).
- If surveys result in the observation of western spadefoot within proposed Project Area, observed individuals and/or eggs shall be removed from proposed Project Area and be relocated to pre-determined suitable habitat in an appropriate area that will not be impacted.
- For work during the western spadefoot toad migration and breeding season (November 1 to May 31), a qualified biologist will survey the active work areas (including access roads) in the

mornings following measurable precipitation events. Construction may commence upon confirmation from the biologist that no western spadefoot toads are in the work area.

- When feasible, a 50-foot avoidance buffer will be maintained around burrows that provide suitable upland habitat for western spadefoot toad, as identified by a qualified biologist. The biologist will delineate and mark the no-disturbance buffer.
- If western spadefoot toad is found within the construction footprint, it will be allowed to move out of harm's way on its own accord or a qualified biologist will relocate it to the nearest suitable burrow outside of the construction impact area.
- Prior to beginning work, a qualified biologist will inspect underneath equipment and stored pipes greater than 1.2 inches (3 cm) in diameter for western spadefoot toad. If found, they will be allowed to move out of the construction area on their own accord.

BIO-7: San Bernardino Kangaroo Rat Pre-Construction Presence/Absence Trapping Surveys. Prior to ground disturbing activities within areas with potential habitat for SBKR or other sensitive small mammals, a qualified SBKR biologist with a required Section 10(a) permit will conduct pre-construction presence/absence trapping surveys. These surveys will follow protocols and trapping methods approved by the regulatory agencies to determine the presence/absence of SBKR and other sensitive small mammals on-site.

- If pre-construction presence/absence trapping surveys within the Stage 1 area are negative, then exclusionary fencing (Mitigation Measure BIO-8) will be installed.
- If results from the trapping surveys demonstrate that SBKR are present within the Stage 1 proposed Project Area, an ITP will need to be obtained. Construction within occupied habitat areas will not proceed until appropriate authorization (i.e., FESA and/or CESA Incidental Take Permit (ITP) is obtained.
- Stage 2 construction will not commence until appropriate authorization (i.e., FESA and/or CESA ITP) is obtained. Implementation of protection measures and compensatory mitigation for SBKR, in addition to those identified in this document, will be required as conditions of federal and state take permits.

BIO-8: San Bernardino Kangaroo Rat Exclusionary Fencing. Exclusionary fencing will be erected in construction areas with potential to be occupied by SBKR or containing kangaroo rat sign (e.g., burrows, scat, tail drag, or dust baths) as determined by a preconstruction survey conducted by a qualified biologist.

- A qualified biologist or approved biological monitor will be present on-site when the fence is installed to minimize disturbance of SBKR burrows from fence installation.
- The integrity of the fencing will be checked by a qualified biologist at the end of each workday. Any gaps will be repaired immediately.
- Construction access openings will be closed and secured at the end of each workday using the at-grade fencing method.
- The fence will remain in place for the duration of construction activities and removed at the completion of the relevant proposed Project activity.
- Stage 1 exclusionary fencing will be installed at grade to minimize the risk of unauthorized take.

BIO-9: San Bernardino Kangaroo Rat and General Construction Monitoring.

SBKR Biologist. A qualified biologist or approved biological monitor shall visually inspect trenches and steep-walled holes before the onset of daily construction for presence of SBKR. If SBKR are discovered, the biologist shall supervise the movement or relocation of the equipment until the animal has left the area on its own.

- To the extent feasible, soil stockpiles in SBKR habitat will be located within the construction area inside the exclusionary fence or within the existing facility in areas devoid of vegetation.
- Nighttime work shall be avoided as much as possible. If nighttime work is necessary, all lighting shall be directed exclusively at the work area to avoid areas that support local wildlife movement, such as ephemeral drainages, to the greatest extent practical. Any nighttime lighting shall be shielded downward to avoid light spillage into the surrounding areas.

Limits of Disturbance. Prior to construction in or adjacent to habitats for special-status species, and under the direction of a qualified biologist, Metropolitan shall clearly delineate the construction right-of-way (stake, flag, fence, etc.) that restricts the limits of construction to the minimum necessary to implement the proposed Project.

Biological Monitoring. Prior to the start of construction, Metropolitan shall retain a qualified biological monitor(s) to be on-site during the initial ground disturbance and during construction activities to monitor habitat conditions and impacts. The biological monitor will ensure compliance with mitigation measures and will have the authority to halt or suspend all activities until appropriate corrective measures have been taken. The biological monitor shall be a qualified biologist with species expertise appropriate for the proposed Project.

On-Site Overnight Storage. All construction pipes, culverts, or similar structures that are stored at a construction site for one or more overnight periods should be thoroughly inspected for birds and other wildlife before the pipe is subsequently buried, capped, or otherwise used or moved.

BIO-10: Special-Status Ground-Dwelling Wildlife. A qualified biologist shall conduct a preconstruction clearance survey throughout the proposed Project Area. If any special-status ground-dwelling wildlife, protected in accordance with CESA and FGC, such as the Belding's orange-throated whiptail, California glossy snake, coast horned lizard, coastal western whiptail, Los Angeles pocket mouse, northwestern San Diego pocket mouse, red-diamond rattlesnake, San Diego black-tailed jackrabbit, San Diego desert woodrat, Southern California legless lizard, and southern grasshopper mouse are observed during the survey, a qualified biologist should relocate the individual to suitable habitat adjacent to the proposed Project Area.

BIO-11: Burrowing Owl. Prior to the initiation of any ground disturbing activities within 500 feet of suitable burrowing owl habitat, including all of the natural communities and land cover types within the Study Area, focused surveys for burrowing owl shall be conducted by a qualified biologist throughout the Study Area following the most current CDFW required protocol for the species. If the qualified biologist finds evidence of burrowing owls during the burrowing owl breeding season (February 1 through August 31), all Project-related activities shall avoid nest sites during the remainder of the breeding season or while the nest remains occupied by adults or young (nest occupation includes individuals or family groups foraging on or near the site following fledging). Avoidance includes establishment of a minimum 300-foot buffer zone around nests. Construction and other proposed Project-related activities may occur outside of the 300-foot buffer zone. Construction and other proposed Project-related activities may be allowed inside of the

300-foot avoidance buffer during the breeding season if the nest is not disturbed, and the proposed Project activities are monitored by a qualified biologist.

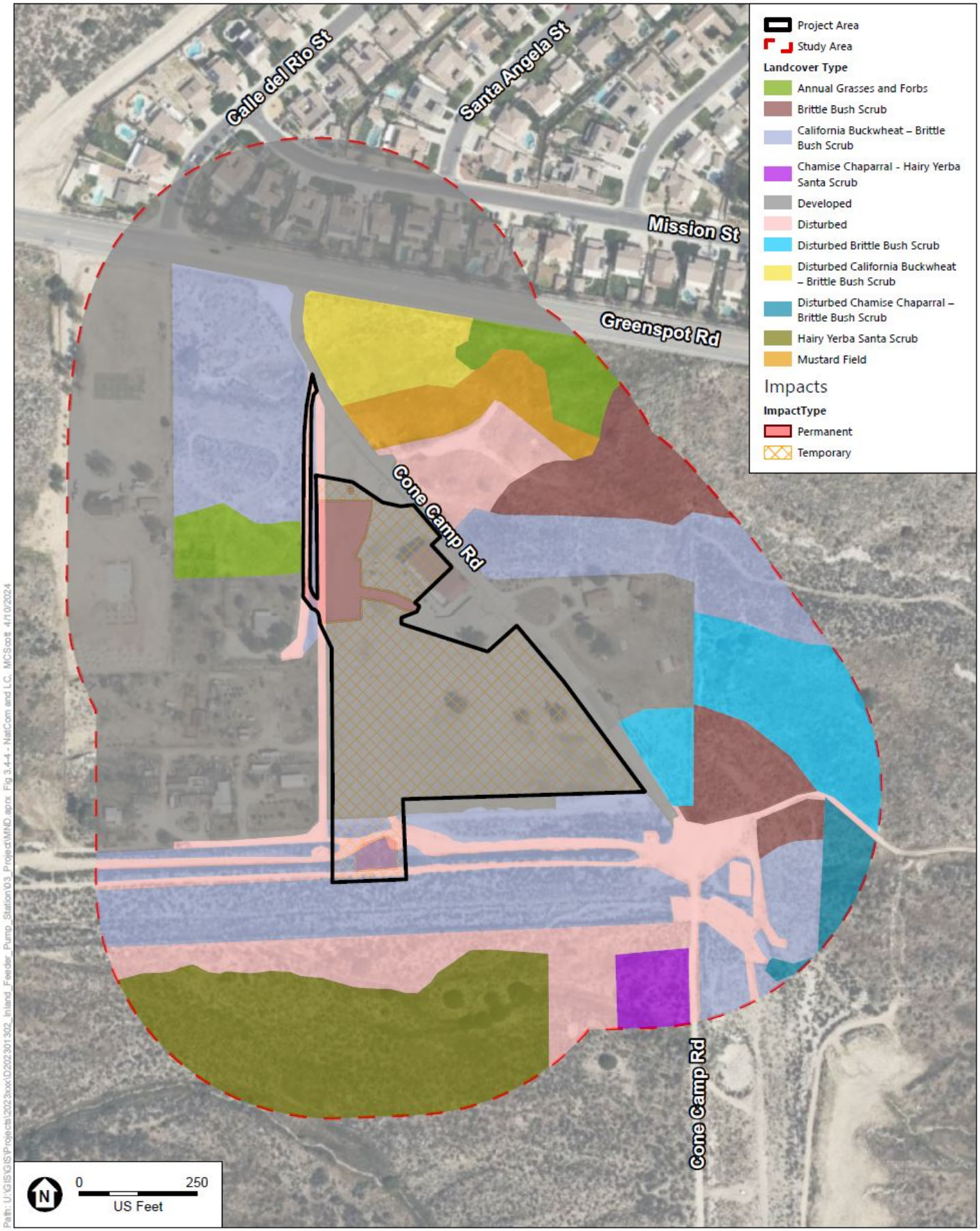
b. *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

No Impact. No, the proposed Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. No riparian habitat or other sensitive natural communities have been identified within the Study Area (Figure 3.4-2). Feature 1, comprised of an unvegetated constructed basin and ephemeral drainage/roadway, occurs along the western extent of the proposed Project Area, and four additional Features (2 through 5) comprised of three ephemeral drainages, and a constructed drainage occur within the Study Area (outside of the proposed Project Area). However, these aquatic features do not support riparian vegetation. While the Study Area is mapped by CNDDB as occurring within Riversidean alluvial fan sage scrub habitat with a State rank of S1.1, the Riversidean alluvial fan sage scrub habitat indicator species, scale broom (*Lepidospartum squamatum*), was not observed as a dominant species within any of the observed natural communities (Figure 3.4-4). Only one scale broom individual was observed within the Study Area. As a result, no natural communities present within the Study Area or proposed Project Area meet the criteria for Riversidean alluvial fan sage scrub and there are no other sensitive natural communities within the Study Area based on a review of CDFW's California Sensitive Natural Communities List. Therefore, no impact to riparian habitat or other sensitive natural community would occur.

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?*

No Impact. No, the proposed Project would not have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. Five features (Features 1, 2, 3, 4, and 5) were identified in the Study Area. No state or federally protected wetlands were identified within the Study Area.

Features 2, 3, 4, and 5 are located outside of the proposed Project Area; however, Features 2 and 3 are potentially jurisdictional under CDFW and RWQCB. The proposed Project would be required to comply with the implementation of Metropolitan's Standard Practices outlined in Appendix A which requires a WEAP training, clear demarcation or proposed Project limits, proper containment of hazardous materials, adherence to hydrology and water quality requirements, and Stormwater Pollution Prevention Plan (SWPPP) requirements; therefore, no indirect impacts would occur to these features.



SOURCE: ESA, 2024

Inland Feeder - Foothill Pump Station Intertie Project

Figure 3.4-4
Natural Communities and Land Cover Types

ESA

Feature 1 is the only aquatic resource identified within the proposed Project Area and consists of a constructed basin and an associated drainage feature/road which captures stormwater runoff along an existing access road. The basin was constructed in an upland area within the northwestern portion of the proposed Project Area to capture surface water runoff and allow it to infiltrate into the ground within the basin. Feature 1 is less than one acre in size and is used and maintained for the detention, retention, and infiltration of stormwater runoff. This feature does not meet the definition of a water of the state and does not contain or support wetland or riparian habitat, and therefore, is not likely to be considered jurisdictional by the USACE, CDFW and RWQCB. Therefore, no impacts would occur.

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?

Less-Than-Significant Impact with Mitigation Incorporated. No, the proposed Project would not 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 The proposed Project Area and Study Area do not overlap with designated or recognized wildlife corridors (Spencer et al. 2010). The proposed Project would occur along an existing pipeline infrastructure alignment and would not introduce new barriers to wildlife movement. While wildlife likely use the Study Area to forage, breed, and to some extent, for local and regional movement, the proposed Project Area does not link large areas of contiguous, intact habitat together, and is not expected to function as an important migration corridor. Existing chain-link fencing is present along the perimeter of the majority of the developed and compacted portion of the proposed Project Area and rural residential development surrounds the proposed Project Area to the north, east, and west likely deterring wildlife movement. The land surrounding the proposed Project Area to the south is comprised of undeveloped land that wildlife likely utilizes to forage and breed, and to some extent, travel locally and regionally. The proposed Project components to be constructed outside of the fenced Foothill Pump Station facility would be mainly underground with an aboveground hatch to allow for access to the vault.

The proposed Project may result in both direct and indirect impacts to nesting migratory and special-status birds, herps, and small mammals (e.g., dispersal and/or breeding habitat for Crotch bumble bee, coastal California gnatcatcher, western spadefoot, or San Bernardino kangaroo rat within this region) that may utilize the Study Area for foraging, denning, and/or nesting. While the proposed Project would permanently impact 0.12 acre and temporarily impact 0.25 acre of California buckwheat – brittle bush scrub habitat, the proposed Project would avoid 28.41 acres of natural communities suitable to support wildlife in the surrounding Study Area, outside of the proposed Project Area (Figure 3.4-4). In addition, areas temporarily impacted by the proposed Project would be restored to their original condition following proposed Project completion. Nevertheless, ground disturbance and vegetation clearing activities may disrupt foraging and breeding/nesting behavior, such as copulation, nest building or incubation, or result in the removal of an active nest or burrow.

Implementation of Metropolitan's Standard Practices outlined in Appendix A requires a WEAP training, clear demarcation of proposed Project limits, proper containment of hazardous materials, trash/debris removal, maintaining required speed limits, and lighting restrictions to prevent unintended impacts during proposed Project construction. In addition, implementation of **Mitigation Measure BIO-1, and Mitigation**

Measures BIO-3 through BIO-11 would reduce potential impacts to less than significant. Therefore, impacts to the movement of wildlife would be less than significant with mitigation incorporated.

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

No Impact. No, the proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. The City of Highland Municipal Code, Chapter 8.36 (Heritage Trees) and Chapter 16.64.040 (Heritage Tree Preservation Requirements) provides regulations and guidelines for the removal, relocation, or destruction of any heritage tree or historic landmark tree within the City of Highland's city limits, requiring proper tree removal permit and associated environmental review prior to impacting protected trees. Additionally, Chapter 16.64.050 (Riparian Plant Conservation) establishes regulations to promote healthy and abundant riparian habitats within the City of Highland, working alongside existing regulations enforced by CDFW, prohibiting the removal of any riparian vegetation within 5 feet of the dripline of riparian vegetation adjacent to a "blueline stream" as indicated by the USGS Quadrangle (topographic map) or identified as a protected riparian area in a community or specific plan. The proposed Project would not impact regulated trees or riparian vegetation identified in the City of Highland Municipal Code. No other applicable local policies or ordinances would be applicable to the proposed Project. Therefore, no impact to local policies or ordinances protecting biological resources would occur.

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?

Less-Than-Significant Impact with Mitigation Incorporated. No, the proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. The southwestern portion of the proposed Project Area, and the southern and southeastern portions of the surrounding Study Area, are situated within the boundaries defined by the adopted Upper Santa Ana River Wash Habitat Conservation Plan (Wash Plan HCP).

The Wash Plan HCP was prepared by SBVWCD and officially adopted in 2022. Its primary objective is to effectively manage ground-disturbing activities related to water conservation, aggregate mining, recreational activities, and other public services within the Plan Area while concurrently conserving natural ecosystems and populations of special-status species. A total of five special-status species are covered by the Wash Plan HCP including: slender-horned spineflower, Santa Ana River woolly-star, cactus wren, coastal California gnatcatcher, and San Bernardino kangaroo rat. Metropolitan is not a signatory to the Wash Plan HCP. Consequently, the proposed Project is not a Covered Activity within the Wash Plan HCP.

The southwestern portion of the proposed Project Area overlaps with the District Conserved Lands. District Conserved Lands include lands owned by the Conservation District and Redlands and lands included in land exchange between BLM and the Conservation District, which will be permanently conserved for the five species covered by the HCP. The HCP (and HCP Preserve) will be implemented in two phases linked to the BLM land exchange. Phase 1 will occur pre-BLM land exchange (within 10 years after the issuance of the ITP) and Phase 2 will occur post-BLM land exchange (no later than 28 years after the issuance of the ITP). The District Conserved Lands that overlap with the proposed Project Area are projected to be adopted

for conservation during Phase 2. Minor temporary impact to 0.25 acre and permanent impact to 0.12 acre of California buckwheat – brittle bush scrub habitat within the District Conserved Lands (Phase 2) area is proposed to occur from the proposed Project activities. However, implementation of **Mitigation Measure BIO-3** would ensure that the habitat would be fully restored before conservation efforts begin under the HCP Preserve implementation timeline.

While the proposed Project boundary overlaps with the adopted Wash Plan HCP and shares the potential to support some of the same special-status species, the implementation of **Mitigation Measures BIO-1** through **BIO-11** would ensure that impacts to Covered Species addressed in the Wash Plan HCP remain less than significant and do not conflict with its provisions. Therefore, impacts would be less than significant with mitigation incorporated.

REFERENCES

CDFW (California Department of Fish and Wildlife). 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. March 20, 2018.

CDFW (California Department of Fish and Wildlife). 2023a. California Natural Diversity Data Base (CNDDB). Database. Accessed December 21, 2023.

CDFW (California Department of Fish and Wildlife). 2023b. California Sensitive Natural Communities List. Sacramento, CA: CDFW, Natural Heritage Division, June 1, 2023. Accessed December 21, 2023. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153609&inline.

CDFW (California Department of Fish and Wildlife). 2023c. Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species. June 6, 2023.

CNDDB (California Natural Diversity Database). 2024. Special Animals List. California Department of Fish and Wildlife. Sacramento, CA. January 2024.

CNPS (California Native Plant Society). 2023. Inventory of Rare and Endangered Vascular Plants of California. Database. Accessed December 21, 2023.

ECORP. 2022. Results of a Focused San Bernardino Kangaroo Rat Trapping Survey Conducted for the Metropolitan Water District of Southern California's Foothill Pump Station Project, Highland, San Bernardino, California. November 18, 2022.

ESA (Environmental Science Associates). 2023a. Results of a San Bernardino Kangaroo Rat Burrow Survey for Metropolitan's Inland Feeder Foothill Pump Station Intertie Phase 1 Project, City of Highland, San Bernardino County, California. April 13, 2023.

ESA (Environmental Science Associates). 2023b. Results of Nighttime Small Mammal Activity Surveys for Metropolitan's Inland Feeder Foothill Pump Station Intertie Phase 1 Project, City of Highland, San Bernardino County, California. November 16, 2023.

NRCS (Natural Resource Conservation Service). 2023. Web Soil Survey. Accessed December 21, 2023. https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm.

Spencer, W. D., P. Beier, K. Penrod, K. Winters, C. Paulman, H. Rustigian-Romsos, J. Strittholt, M. Parisi, and A. Pettler. 2010. California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California. Prepared for California Department of Transportation, California Department of Fish and Game, and Federal Highways Administration.

Thorp, R. W., Horning, D. S., and Dunning, L. L. 1983. Bumble bees and cuckoo bumble bees of California (Hymenoptera, Apidae) Vol. 23). Univ of California Press.

USFWS (U.S. Fish and Wildlife Service). 2008. Endangered and Threatened Wildlife and Plants; Revised Designation of Critical Habitat for the San Bernardino Kangaroo Rat (*Dipodomys merriami parvus*). 50 CFR Part 17. [FWS-R8-ES-2007-0008]; [92210-1117-0000 B4]. RIN 1018-AV07. Vol. 73, No. 74. April 16, 2008.

USFWS (U.S. Fish and Wildlife Service). 2023a. Critical Habitat Portal. Accessed December 21, 2023. https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265 ad4fe09893cf75b8dbfb77.

USFWS (U.S. Fish and Wildlife Service). 2023b. National Wetland Inventory. Accessed December 21, 2023. https://www.fws.gov/wetlands/data/Mapper.html.

3.5 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 §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 dedicated cemeteries?	☐	☐	☒	☐

Significance criteria established by CEQA Guidelines, Appendix G.

Cultural resources include buildings, sites, districts, structures, or objects having historical, architectural, archaeological, or cultural importance. Cultural resources can include structures in the built environment (such as buildings or infrastructure) or buried resources, including archaeological sites and human remains. This section provides an analysis of proposed Project impacts on cultural resources, including historical and archaeological resources as well as human remains, and is based on the Cultural Resource Assessment attached as Appendix D.

REGULATORY FRAMEWORK

CEQA requires a Lead Agency to determine whether a project may have a significant effect on historical resources (Public Resources Code (PRC) Section 21084.1) and archaeological resources (PRC Section 21083.2). A historical resource is a resource listed in, or determined to be eligible for listing, in the California Register of Historical Resources (CRHR); a resource included in a local register of historical resources; or any object, building, structure, site, area, place, record, or manuscript that a Lead Agency determines to be historically significant (CEQA Guidelines Section 15064.5[a][1-3]). Resources listed on the National Register of Historic Places are automatically listed on the CRHR, along with State Landmarks and Points of Interest. The CRHR can also include properties designated under local ordinances or identified through local historical resource surveys. In addition, a resource shall be considered historically significant if it:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

PRC Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;

2. Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

METHODOLOGY

A search of the California Historical Resources Information System (CHRIS) was conducted to identify any previously recorded cultural resources within a 0.5-mile radius of the proposed Project Area. The CHRIS records are maintained by nine Information Centers located across California and organized by county. Cultural resource records for San Bernardino County are maintained at the South Central Coastal Information Center (SCCIC), housed at California State University, Fullerton. The records search was conducted on December 15, 2023, and included a review of all recorded archaeological resources and previous studies within the proposed Project Area.

The SCCIC records search indicated that 13 cultural resources studies have been previously conducted within a 0.50-mile radius of the proposed Project Area. Of these 13 studies, two overlap nearly 90 percent of the proposed Project Area. Additionally, eighteen cultural resources were previously recorded within a 0.50-mile radius of the proposed Project Area. Of the 18 resources, eight are historic-period archaeological sites, two are historic isolates, and eight are historic built environment structures. One built environment resource (P-36-010681) was previously recorded within the proposed Project Area. P-36-010681 was a historic ranch complex and chicken farm. It was destroyed in 2002 during the construction for the Inland Feeder. No previously recorded prehistoric archaeological resources were identified during the records search.

A Sacred Lands File (SLF) search was completed by the Native American Heritage Commission (NAHC) with positive results for the proposed Project Area (Appendix D). The SLF results do not provide specific details on the nature or precise location of the Sacred Lands or whether they are related to any cultural resource recorded by the CHRIS at the SCCIC; thus, additional details cannot be provided. The NAHC provided a list of tribal contacts and recommended that they be contacted to obtain additional information.

A pedestrian field survey for cultural resources was conducted on December 20, 2023. The previously recorded site within the proposed Project Area (P-36-010681) was not relocated during the survey given that it was removed before 2005. No new cultural resources were observed during the survey.

ANALYSIS OF IMPACTS

a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

No Impact. No, the proposed Project would not cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5. The previously recorded resource within the proposed Project Area, P-36-010681, was determined ineligible for listing in the California Register of Historical Resources or the National Register of Historic Places (Horne and Inoway 2002). No other potential historical resource were identified within the proposed Project Area from the record search and no additional resources were identified during the pedestrian survey of the proposed Project Area. Therefore, the proposed Project would not cause a substantial adverse change in the significance of a historical resource, and no impact would occur.

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

No Impact. No, the proposed Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5. The cultural resources record search and pedestrian field survey did not identify any prehistoric archaeological resources within the proposed Project Area. One historic-period archaeological site, P-36-010681, was previously recorded within the proposed Project Area, but evaluated and destroyed during the construction of the Inland Feeder. The proposed Project Area is highly disturbed from the previous construction of the Inland Feeder and other subsurface water infrastructure located within the proposed Project Area. The possibility that previously undiscovered buried archeological resources could be encountered during ground-disturbing activities is low. Furthermore, Metropolitan Standard Practices (Appendix A) require that in the event unanticipated archaeological resources are discovered during proposed Project construction, all work would cease within 50 feet of the discovery to protect the area until a qualified archaeologist can evaluate the discovery and recommend additional measures for proper handling and treatment. In addition, Metropolitan Standard Practices also require that a WEAP training would be conducted for all construction personnel. There would be no additional ground-disturbance during proposed Project operation. Therefore, there would be no impact to archaeological resources.

c. Disturb any human remains, including those interred outside of formal cemeteries?

Less-Than-Significant Impact. No, the proposed Project would not disturb any human remains, including those interred outside of formal cemeteries. The proposed Project Area has been previously disturbed by the construction and installation of pipeline infrastructure associated with the Inland Feeder, and no human remains had been identified during previous excavations in or within the vicinity of the proposed Project Area during Inland Feeder ground-disturbing activities. Should previously undiscovered human remains be encountered, Metropolitan would comply with the State of California's Health and Safety Code Section 7050.5, which states that no further disturbance shall occur until the county coroner has made a determination of origin and disposition of the remains pursuant to PRC Section 5097.98. Adherence to State of California's Health and Safety Code Section 7050.5 would result in the proper handling and treatment of unexpected human remains. Therefore, impacts would be less than significant.

REFERENCES

Horne, M., and C. Inoway, 2002. Archaeological Site Record Update for P-36-010681. On file at the South-Central Coastal Information Center.

3.6 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?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

ANALYSIS OF IMPACTS

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?

Less-Than-Significant Impact. No, the proposed Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during proposed Project construction or operation. Energy use during the proposed Project construction would include fuel consumption (e.g., gasoline and diesel fuel) to operate heavy equipment, light-duty vehicles, haul trucks, and generators for lighting. Electrical power used during proposed Project construction would be supplied from existing electrical infrastructure at the Foothill Pump Station facility. Use of natural gas would not be needed during proposed Project construction or operation. Energy use during construction would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. In addition, the Project Contractor(s) would be required to restrict the idling of heavy-duty diesel motor vehicles in accordance with Title 13 California Code of Regulations Section 2449(d)(3) and Section 2485 and utilize fleets that comply with CARB's Regulation of In-Use (On-Road) Heavy-Duty Diesel-Fueled Vehicles, which governs the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Construction activities would utilize fuel-efficient equipment consistent with state and federal regulations and comply with state measures to reduce the inefficient, wasteful, or unnecessary consumption of energy. Project Contractor(s) would be required to comply with applicable regulatory construction waste management practices to divert construction and demolition debris. Overall, these practices would result in efficient use of energy, and proposed Project construction activities would require the minimum necessary electricity and transportation fuel consumption and would not have an adverse impact on available electricity or transportation fuel supplies or infrastructure.

The proposed Project is a water infrastructure project that would not increase water supply. The proposed Project would allow Metropolitan to pump and deliver water from DVL to the Rialto service area, which is currently only able to receive SWP water. This allows for greater water infrastructure reliability to the Rialto service area by improving the water distribution system flexibility to operate more efficiently in both wet years and under the more frequently occurring drought conditions. Operations and maintenance activities associated with the proposed Project would be similar to existing conditions once construction activities are completed and would only slightly increase the demand for electricity resources. Therefore, the only source of emissions would be associated with periodic vehicle trips by Metropolitan employees

for maintenance activities and the proposed Project would not increase the number of Metropolitan employees required for operations and maintenance activities. Operational energy consumption as a result of the use of transportation fuels (e.g., diesel and gasoline) associated with occasional maintenance vehicles traveling to and from the proposed Project Area would be minimal due to the infrequent recurrence of operational maintenance events. Additionally, proposed Project operational equipment installed would be new and designed to meet applicable current energy standards for such equipment and would only slightly increase the demand for electricity resources. Accordingly, proposed Project construction and operation would not result in the wasteful, inefficient, or unnecessary consumption of energy resources and impacts would be less than significant.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. No, the proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Metropolitan has a Climate Action Plan, which was adopted in May 2022, but none of the energy efficiency and conservation measures outlined in Metropolitan's CAP are applicable to the proposed Project (Metropolitan 2022a). In addition, Metropolitan is not subject to the County of San Bernardino *Greenhouse Gas Emissions Reduction Plan Update*, because this plan does not address greenhouse gas emissions and associated energy usage related to Metropolitan's activities (County of San Bernardino 2021). Indirectly, on-road vehicles used during operational maintenance activities would be required to meet the ongoing state fuel efficiency requirements. Therefore, the proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and no impact would occur.

REFERENCES

County of San Bernardino, June 2021. County of San Bernardino *Greenhouse Gas Emissions Reduction Plan Update*. Accessed April 3, 2024. Available: GHG Reduction Plan Update-Greenhouse Gas Reduction Plan Update - Adopted 9-21-2021.pdf (sbcounty.gov)

Metropolitan (The Metropolitan Water District of Southern California), May 2022a. Climate Action Plan (CAP). Accessed April 3, 2024. Available: mwdh2o.com/media/12469/final-cap.pdf.

3.7 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 and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic groundshaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
c) Be located on geologic units 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 Section 1803.5.3 of the California Building Code (2010), 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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Significance criteria established by CEQA Guidelines, Appendix G.

ANALYSIS OF IMPACTS

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

No Impact. No, the proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving rupture of a known earthquake fault. Based on review of available literature and online maps, no active faults are known to traverse the proposed Project Area, and the site is not located within a designated Alquist-Priolo Earthquake Fault Zone (HDR Engineering 2022; U.S. Geological Survey 2022). The nearest Alquist-Priolo Earthquake Fault Zone is located approximately 0.5 miles northeast of the proposed Project Area (California Geological Survey 2021). Therefore, the potential for surface fault rupture is considered low (HDR Engineering 2022). The proposed Project would include construction of an intertie connection between the Inland Feeder and Foothill Pump Station through construction of pipelines, vaults, and surge tanks. Additionally, the proposed Project Area is not occupied by people, and no permanent or temporary structures that would be occupied by people would be constructed and/or operated as part of the proposed Project. Therefore, the proposed Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death associated with rupture of a known earthquake fault and no impact would occur.

ii) Strong seismic ground shaking?

No Impact. No, the proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving strong seismic ground shaking. Several active faults are located in the proximity of the proposed Project Area including the San Andreas Fault, Crafton Hills Fault, and San Jacinto Fault. The nearest active fault is the San Bernardino Mountains section of the San Andreas Fault, located approximately 1.1 miles from the proposed Project Area (HDR Engineering 2022) .). The proposed Project includes implementation of an intertie connection between the Inland Feeder and Foothill Pump Station through construction of pipelines, vaults, and surge tanks. The proposed Project does not contain habitable structures, and the proposed Project does not propose the construction of new habitable structures. Therefore, the proposed Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving seismic ground shaking. All work conducted for the proposed Project would conform to the current seismic design provisions of the California Building Code (California Code of Regulations Title 24). Therefore, the proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving strong seismic ground shaking and no impact would occur.

iii) Seismic-related ground failure, including liquefaction?

No Impact. No, the proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving seismic-related ground failure, including liquefaction. Soil liquefaction is the process in which saturated soil experiences a temporary loss of strength due to the buildup of excess pore water pressure resulting from earthquake ground motions. Liquefaction

may damage structures on saturated, granular soils such as silt or sand, during an earthquake. The proposed Project Area has not been evaluated for liquefaction potential per the California Earthquake Hazards Zone Application (California Geological Survey 2021) or the San Bernardino County Land Use, Geologic Hazards Map (County of San Bernardino 2010). Groundwater is estimated to be deeper than 50 feet below ground surface (bgs) and the subsurface soils are anticipated to mainly consist of dense to very dense granular material. Based on the geotechnical report prepared for the proposed Project, the liquefaction potential for the proposed Project Area is considered low (HDR Engineering 2022). The proposed Project would include construction of an intertie connection between the Inland Feeder and Foothill Pump Station through construction of pipelines, vaults, and surge tanks. There would be no construction of habitable or occupied structures. Therefore, the proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving seismic-related ground failure, including liquefaction and no impact would occur.

iv) Landslides?

No Impact. No, the proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving landslides. Landslides and other forms of mass wasting, including mud flows, debris flows, and soil slips, occur as soil moves downslope under the influence of gravity. Landslides are frequently triggered by intense rainfall and/or seismic shaking. Because the proposed Project Area is located in a relatively flat area without any major slopes, the potential for landslides and slope instability is considered to be low at the proposed Project Area (HDR Engineering 2022). None of the proposed Project components would increase or alter landslide potential. The proposed Project would include construction of an intertie connection between the Inland Feeder and Foothill Pump Station through construction of pipelines, vaults, and surge tanks. There would be no construction of habitable or occupied structures. Therefore, the proposed Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death, as a result of landslides and no impact would occur.

b. Result in substantial soil erosion or the loss of topsoil?

No Impact. No, the proposed Project would not result in substantial soil erosion or the loss of topsoil. Earthmoving and grading activities during construction of the proposed Project have the potential to cause erosion. The Construction General Permit requires the implementation of a SWPPP for impacts to more than one acre to reduce erosion and topsoil loss from stormwater runoff during construction activities. Compliance with the requirements set forth in this permit would require the Project Contractor(s) to implement best management practices (BMPs) during construction to prevent substantial soil erosion or the loss of topsoil. Furthermore, operations and maintenance activities would be similar to existing conditions once construction activities are completed. Therefore, the proposed Project would not have the potential to result in substantial soil erosion or loss of topsoil and no impact would occur.

c. Be located on geologic units 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?

No Impact. No, the proposed Project would not be located on unstable geologic units or unstable soil, or that would become unstable as a result of the proposed Project, and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. The proposed Project would include

construction of an intertie connection between the Inland Feeder and Foothill Pump Station through construction of pipelines, vaults, and surge tanks. The proposed Project does not include changes that would result in new instability in the geologic units. As described in responses 3.7(a)(iii) and (a)(iv) above, the proposed Project would not cause or be located in geologic units or soil that is or would become unstable or susceptible to liquefaction or landslides. As described in impact iii, the liquefaction potential for the proposed Project Area is considered low and the site does not contain major slopes, therefore, the potential for lateral spreading at the proposed Project Area is considered low (HDR Engineering 2022). Therefore, the proposed Project would not be located on unstable geologic units or unstable soil, or that would become unstable as a result of the proposed Project, and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse and no impact would occur.

d. Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2010), creating substantial direct or indirect risks to life or property?

No Impact. No, the proposed Project would not be located on expansive soils as defined in Section 1803.5.3 of the California Building Code (2010). The proposed Project would include construction of an intertie connection between the Inland Feeder and Foothill Pump Station through construction of pipelines, vaults, and surge tanks. There would be no construction of habitable or occupied structures. Based on geotechnical report prepared for the proposed Project, the on-site soils primarily consist of dense sands, sandy gravels, cobbles, and boulders which are not considered to be expansive (HRD Engineering 2022). Additionally, expansion test result from near-surface soils indicate that the on-site soils are non-expansive and the potential for expansive soils at the proposed Project Area is considered low (HRD Engineering 2022). Therefore, no impact would occur.

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?

No Impact. No, the proposed Project does not require the installation or use of septic tanks or other alternative wastewater disposal systems. The proposed Project would include construction of an intertie connection between the Inland Feeder and Foothill Pump Station through construction of pipelines, vaults, and surge tanks. There would be no construction of habitable or occupied structures. Portable toilet systems for Metropolitan and construction employees would be provided during proposed Project construction activities, and no permanent septic or wastewater disposal systems would be installed. Therefore, the proposed Project would have no impact related to septic tanks and alternative wastewater systems.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less-Than-Significant Impact. No, the proposed Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. This analysis of proposed Project impacts on paleontological resources is based on the *Paleontological Resources Assessment Report* attached as Appendix E. Per review of the geotechnical report prepared for the proposed Project, a total of three test pits were excavated in the proposed Project Area down to a depth of 49.6 feet bgs. The first 5 to 11 feet of the test pit units yielded artificial fill. Quaternary-age alluvial soils were found beneath the artificial fill and consist of poorly graded sand mixed with gravel, cobbles, and boulders (HDR Engineering 2022). A paleontological resources database search was conducted by the Natural History Museum of Los Angeles County (LACM) on January 7, 2024. Results of the paleontological resources records search conducted by

the LACM indicated that no fossil localities lie directly within the proposed Project Area; however, four fossil localities (LACM VP 1782, 4540, 4619, and 7811) were identified nearby from sedimentary deposits that may be found in the subsurface in the proposed Project Area. LACM VP 1782 produced fossil specimens of the camel family (*Camelidae*) at an unknown depth. LACM VP 4540 yielded specimens of the horse family (*Equidae*) at an unknown depth. LACM VP 4619 produced a fossil specimen of mammoth (*Mammuthus*) at 9 and 11 feet bgs., and LACM VP 7811 produced a fossil specimen of whip snake (*Masticophis*) at 100 feet bgs.

The Quaternary-age alluvial soils in the proposed Project Area are likely less than 5,000 years old and unlikely to contain fossils based on the age of the soils. Therefore, the Quaternary alluvium underlying the proposed Project Area is of low paleontological sensitivity, increasing to higher sensitivity with depth. While the exact depths of the alluvial soils is not known, it is likely deeper than the planned excavation.

Per Metropolitan's Standard Practice (Appendix A), a Project-specific WEAP training would be prepared and given to all construction personnel. The training would include all potential concerns and considerations related to paleontological resources, including types of paleontological resources that may be encountered and the proper procedures to be enacted in the event of an inadvertent discovery of paleontological resources. As outlined in Appendix A, if unanticipated paleontological resources are discovered during construction activities, all work would cease within 50 feet of the discovery to protect the area until a qualified paleontologist can evaluate the discovery and recommend additional measures for the proper handling and treatment. Due to the lack of unique paleontological resources previously recorded within the proposed Project Area, age of soils, and relatively shallow construction excavation depths, impacts would be less than significant.

REFERENCES

California Geological Survey (CGS), 2021. The California Earthquake Hazards Zone Application (EQ Zapp) September 23, 2021. Available online at: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Assessed: December 8, 2023.

County of San Bernardino, 2010. San Bernardino County Land Use, Geologic Hazard Maps. Available online at: https://lus.sbcounty.gov/planning-home/zoning-and-overlay-maps/geologic-hazard-maps/. Accessed: December 12, 2023.

HDR Engineering, 2022. Geotechnical Report Inland Feeder-Foothill Pump Station Project. Accessed: December 12, 2023.

U.S. Geological Survey, 2022. U.S. Quaternary Faults Map. Available online at: https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf. Accessed: December 12, 2023.

3.8 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 a 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?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. Climate change is the result of numerous, cumulative sources of GHG emissions contributing to the "greenhouse effect," a natural occurrence that takes place in Earth's atmosphere and helps regulate the temperature of the planet. GHG emissions occur both naturally and as a result of human activities, such as fossil fuel burning, decomposition of landfill wastes, raising livestock, deforestation, and some agricultural practices. GHGs produced by human activities include carbon dioxide (CO2), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. The global warming potential of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO2) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as "carbon dioxide equivalent" (CO2e), which is the amount of GHG emitted multiplied by its global warming potential.

REGULATORY FRAMEWORK

In response to climate change, California implemented Assembly Bill (AB) 32, the "California Global Warming Solutions Act of 2006." AB 32 required the reduction of statewide GHG emissions to 1990 emissions levels (essentially a 15 percent reduction below 2005 emission levels) by 2020 and the adoption of rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions. On September 8, 2016, the Governor signed Senate Bill (SB) 32 into law, extending AB 32 by requiring the State to further reduce GHG emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged).

In 2022, AB 1279 was passed which requires the State to both achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter, and to ensure that by 2045, statewide anthropogenic GHG emissions are reduced to at least 85 percent below the 1990 levels. In December 2022, CARB adopted the *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) (CARB 2022). The 2022 Scoping Plan relies on the continuation and expansion of existing policies and regulations, but also responds to AB 1279, outlining a technologically feasible, cost-effective, and equity-focused path to achieve the state's climate target of reducing anthropogenic emissions

to 85 percent below 1990 levels by 2045 and achieving carbon neutrality[11] by 2045 or earlier (CARB 2022). The 2022 Scoping Plan outlines the strategies the state will implement to achieve carbon neutrality by reducing GHG emissions to meet the anthropogenic target, and by expanding actions to capture and store carbon through the state's natural and working lands and using a variety of mechanical approaches. The major element of the 2022 Scoping Plan is the decarbonization of every sector of the economy. This effort requires the following key actions: (1) rapidly move to zero-emissions transportation for cars, buses, trains, and trucks; (2) phase out the use of fossil-fuel gas for heating; (3) clamp down on chemicals and refrigerants; (4) provide communities with sustainable options such as walking, biking, and public transit to reduce reliance on cars; (5) continue to build out solar arrays, wind turbine capacity, and other resources to provide clean, renewable energy to displace fossil-fuel–fired electrical generation; and (6) scale up new options such as renewable hydrogen for hard-to-electrify end uses and biomethane where needed.

Despite these efforts, some residual emissions will remain from hard-to-abate industries such as cement, internal combustion vehicles still on the road, and other GHG emissions sources, including high-GWP chemicals used as refrigerants (CARB 2022). The 2022 Scoping Plan addresses the remaining emissions by re-envisioning natural and working lands (such as forests, shrublands/chaparral, croplands, and wetlands) to ensure that they incorporate and store as much carbon as possible. However, the modeling for the 2022 Scoping Plan indicates that natural and working lands, on their own, will not provide enough sequestration and storage to address all residual emissions. Therefore, it will be necessary to research, develop, and deploy additional methods of capturing CO2 that include pulling it from smokestacks of facilities, or drawing it out of the atmosphere itself and then safely and permanently utilizing and storing it (CARB 2022).

The SCAQMD has not formally adopted a significance threshold for GHG emissions generated by a proposed project for which the SCAQMD is not the lead agency, nor has it adopted a uniform methodology for analyzing impacts related to GHG emissions on global climate change. In the absence of any industry-wide accepted standards, the SCAQMD's significance threshold of 10,000 metric tons per year (MT/year) CO_2e for projects in which it is the lead agency is the most relevant air district-adopted GHG significance threshold and is used as a benchmark for the proposed project. It should be noted that the SCAQMD's significance threshold of 10,000 MT/year CO_2e for industrial projects is intended for long-term operational GHG emissions. The SCAQMD has developed guidance for the determination of the significance of GHG construction emissions that recommends that total emissions from construction be amortized over 30 years and added to operational emissions and then compared to the threshold (SCAQMD 2008). The GHG impacts of the proposed project would be evaluated based on the recommended methodologies from the SCAQMD in this EIR

In May 2022, Metropolitan adopted a Climate Action Plan (CAP) and certified the associated Program EIR (Metropolitan 2022a; 2022b). Metropolitan's CAP complies with the requirements of CEQA Guidelines Section 15183.5(b)(1) for a qualified greenhouse gas (GHG) reduction plan, and as such, can be used to streamline and tier CEQA GHG analysis and mitigate for GHG impacts associated with construction and operational activities (Metropolitan 2022a). The CAP includes a baseline GHG emissions inventory of

[11] *Carbon neutrality* means "net zero" emissions of GHGs. In other words, it means that GHG emissions generated by sources such as transportation, power plants, and industrial processes must be less than or equal to the amount of CO_2 that is stored, both in natural sinks and through mechanical sequestration. AB 1279 uses the terminology "net zero" and the 2022 Scoping Plan uses the terminology "carbon neutrality" or "carbon neutral." For purposes of this MND, these terms mean the same thing and are used interchangeably.

Metropolitan's operations from 1990 through 2020 and a GHG emissions forecast through 2045. The CAP established Metropolitan's GHG emissions reduction targets to be consistent with SB 32 (40 percent reduction below 1990 levels by 2030) and AB 1279, which codifies the State's goal of achieving carbon neutrality by 2045. The CAP also establishes actions and policies that Metropolitan could implement to achieve its GHG reduction targets. The CAP includes a suite of GHG emissions reduction measures to be implemented that would reduce Metropolitan's GHG emissions to achieve the adopted emissions reduction targets established in the CAP. By following these emissions reduction measures, Metropolitan would exceed the State's target of 40 percent below 1990 levels by 2030 and make significant progress toward ultimately achieving carbon neutrality by 2045 (Metropolitan 2022a).

METHODOLOGY

Similar to the air pollutant emissions modeling, GHG emissions associated with the proposed Project were estimated using CalEEMod (Version 2022.1.1). CalEEMod uses Project-specific information, including the Project's land uses and location, to estimate a Project's emissions (Refer to Appendix B for the air quality and greenhouse gas emissions modeling). Operations and maintenance activities, including the frequency of staff visits, maintenance, shutdowns, would be similar to existing conditions once construction activities are completed and would only slightly increase the demand for electricity resources. The only source of emissions would be associated with periodic vehicle trips by Metropolitan employees for maintenance activities. Due to the minimal emissions that would result from these periodic vehicle trips by Metropolitan employees to the proposed Project Areas, the proposed Project's operational emissions are evaluated qualitatively in this MND.

ANALYSIS OF IMPACTS

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less-Than-Significant Impact. No, the proposed Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. As outlined in Section 1.1 of Metropolitan's CAP, the CAP meets the requirements of CEQA Guidelines Section 15183.5(b)(1) for a qualified GHG emissions reduction plan (Metropolitan 2022a). As a result, pursuant to CEQA Guidelines Section 15183.5(a) and 15183.5(b), Metropolitan can streamline the CEQA review of its projects using the GHG emissions analysis completed for the CAP if the proposed program is consistent with the adopted CAP. Therefore, this analysis relies upon the streamlining provisions of CEQA Guidelines Section 15183.5 to determine whether the proposed Program would generate GHG emissions that may have a significant impact on the environment by evaluating whether the proposed Program would be consistent with the CAP.

Proposed Project construction activities would generate temporary GHG emissions through the use of construction vehicles and equipment, haul trips, and transport of employees and materials to and from the work site, electricity from construction trailers and water usage for fugitive dust control. Proposed Project construction emissions were modeled consistent with construction modeling in Section 3.3, *Air Quality*. Table 3.8-1 represents the greenhouse gas emissions for construction of the proposed Project.

TABLE 3.8-1
PROPOSED PROJECT CONSTRUCTION GHG EMISSIONS

Source	Maximum GHG Emissions (MTCO2e/year)
Construction Equipment and On-Site Trucks	192
On-Road Mobile Sources	175
Water + Construction Office	16
Total Construction CO_2e	**383**
Amortized Construction Emissions	13

SOURCE: ESA 2024

Industry standards recommend that construction project GHG emissions should be amortized over a 30-year project lifetime, so that construction GHG emissions are included as part of the operational GHG life cycle. Per the recommendation, GHG emissions from construction were amortized over the 30-year lifetime of the proposed Project (SCAQMD 2008). Total estimated construction related GHG emissions for the proposed Project are estimated at approximately 379 $MTCO_2e$. This would equal to approximately 13 $MTCO_2e$ per year after amortization over 30 years.

As explained above, the proposed Project is a water infrastructure project that would not increase water supply, but rather enhance water delivery flexibility in response to drought conditions and limited SWP allocations. Metropolitan is proposing an intertie connection between the Inland Feeder and Foothill Pump Station and would not directly or indirectly cause growth (see Section 1.0, *Project Description*, for additional details). Operations and maintenance activities at the Foothill Pump Station facility, including the frequency of staff visits, maintenance, shutdowns, would be similar to existing conditions once construction activities are completed and would only slightly increase the demand for electricity resources. The main source of emissions would be associated with periodic vehicle trips by Metropolitan employees for maintenance activities and the proposed Project would not increase the number of Metropolitan employees required for operations and maintenance activities.

Emissions reduction measures listed in the CAP would be incorporated into the proposed Project, if applicable and proposed Project GHG emissions would be quantified as part of the CAP annual reporting. As noted previously, Metropolitan adopted a CAP to address and mitigate organization-wide GHG emissions associated with construction and operational activities. Metropolitan's annual 2022 CAP Progress Report states approximately 9,678,470 MT of CO2e remains in the carbon budget for years 2022 through 2045 years (Metropolitan 2023). Pursuant to the annual CAP GHG emissions inventory and reporting procedures, GHG emissions generated by proposed Project activities would be tracked as part of Metropolitan's overall carbon budget through data collected from construction contractors, utility and service providers (electricity, natural gas, water, wastewater, and solid waste), and the employee commute survey. In addition, organization-wide CAP measures would be implemented to reduce Metropolitan's GHG emissions over time such that GHG emissions remain within the carbon budget. As shown in Table 3.8-1, the construction of the Project would generate approximately 13 metric tons of CO_2e per year, which would be less than the SCAQMD 10,000 metric tons of CO_2e per year quantitative significance threshold for industrial projects. In addition, as discussed above, Project operational GHG emissions were

discussed qualitatively because the main source of Project operations emissions would be associated with periodic vehicle trips by Metropolitan employees for maintenance activities and the proposed Project would not increase the number of Metropolitan employees required for operations and maintenance activities. Therefore, once constructed, the proposed Project would result in minimal operational emissions associated with operations and maintenance, and no long-term GHG impact would occur. As such, due to the Project's minimal construction and operational GHG emissions, the Proposed Project would result in a less than significant impact related to GHG emissions.

b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

No Impact. No, the proposed Project would not conflict with an applicable plan, policy or regulation of an agency adopted for the purposes of reducing GHG emissions. Applicable plans, policies, and regulations consist of Metropolitan's CAP, SB 32, EO B-55-18, the 2022 Scoping Plan, and AB 1279. As discussed under Threshold GHG-A, the proposed Project would be consistent with Metropolitan's CAP because 1) GHG emissions generated by proposed Project activities would be tracked as part of Metropolitan's overall carbon budget implementing its organization-wide CAP measures to reduce Metropolitan's GHG emissions over time such that GHG emissions remain within the carbon budget; and 2) the proposed Project would incorporate applicable CAP measures. Also, by being consistent with the CAP, the proposed Project would also be consistent with state GHG emission reduction plans, policies, and regulations, such as the 2022 Scoping Plan, SB 32, EO B-55-18, and AB 1279, because the GHG emission reduction targets established by these plans, laws, and policies are incorporated into and consistent with Metropolitan's GHG emissions reduction targets. Therefore, the proposed Project would not conflict with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions, and no impact would occur.

REFERENCES

CARB (California Air Resource Board), November 16, 2022. 2022 Scoping Plan for Achieving Carbon Neutrality. Accessed April 3, 2022. Accessed: https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp_1.pdf.

Metropolitan (The Metropolitan Water District of Southern California), May 2022a. Climate Action Plan (CAP). Accessed April 3, 2024. Available: mwdh2o.com/media/12469/final-cap.pdf.

Metropolitan (The Metropolitan Water District of Southern California), May 2022b. Final Program Environmental Impact Report. Accessed April 3, 2024. Available: mwdh2o.com/media/12469/final-cap.pdf.

Metropolitan (The Metropolitan Water District of Southern California), April 2024. Final Program Environmental Impact Report. Accessed May 6, 2024. Available: https://www.mwdh2o.com/media/xo5ilx4l/metropolitan_climate_action_plan_2023_annual_progress_report.pdf.

SCAQMD (South Coast Air Quality Management District), December 5, 2008. Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, page 5. Accessed 3 April, 2024. Available: https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2.

3.9 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?	☐	☐	☒	☐

Significance criteria established by CEQA Guidelines, Appendix G.

ANALYSIS OF IMPACTS

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less-Than-Significant Impact. No, the proposed Project would not a create significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The proposed Project does not involve routine or permanent transport, use, storage, or disposal of hazardous materials. Construction of the proposed Project would require the temporary transport of hazardous materials to and from the proposed Project Area and the use and storage of these materials. Construction activities would occur in two stages as described in Section 1.0, *Project Description*. The proposed Project's construction equipment and materials would include fuels, oils and lubricants, cement, and concrete, which are all commonly used in construction. Proposed Project construction activities would be required to comply with numerous regulations to ensure that construction-related fuels and other hazardous materials

are transported, used, stored, and disposed of safely to protect employee safety, and to reduce the potential for such fuels or other hazardous materials to be released into the environment, including stormwater and downstream receiving water bodies. In addition, construction contractors would be required to acquire coverage under the National Pollutant Discharge Elimination System (NPDES) General Stormwater Permit, which requires the preparation and implementation of a SWPPP for construction activities. The SWPPP would list the hazardous materials (including petroleum products) proposed for use during construction; describe spill prevention measures, equipment inspections, and equipment and fuel storage; describe protocols for responding immediately to spills; and describe BMPs for controlling site run-on and runoff. Details regarding BMPs designed to minimize erosion are discussed in Appendix A.

Proposed Project operations would not change from existing conditions. In addition, as outlined in Appendix A (Metropolitan Standard Practices), the Project Contractor(s) would be required to follow regulations related to the proper handling, storage, application, disposal, and clean-up of hazardous materials, install drip pans on stationary equipment, and dispose of contaminated materials consistent with all applicable federal, state, and local laws and regulations.

The temporary nature of any hazardous material transport, compliance with federal, state, and local laws and regulations, and implementation of Metropolitan Standard Practices, would ensure that the proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, storage, or disposal of hazardous materials. Impacts would be less than significant.

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?

Less-Than-Significant Impact. No, the proposed Project would not create a significant hazard to the public through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. As discussed in Section 3.9 *(a)* above, the proposed Project would require the temporary use and storage of hazardous materials at the proposed Project Area during construction activities for use in equipment operation, cleaning, and maintenance. The transport, use, storage, and disposal of hazardous materials during proposed Project construction would be conducted in accordance with applicable state and federal laws, as discussed above. As outlined in Appendix A, the Project Contractor(s) would be required to clean up all spills in accordance with all applicable environmental laws and regulations and notify the Engineer immediately in the event of a spill.

The proposed Project does not involve changes to roadways, traffic conditions, permanent ingress or egress, or routine transport of hazardous materials that would create a foreseeable upset or accident conditions. Metropolitan would also comply with their Standard Practices as outlined in Appendix A for requirements related to hazardous materials storage. Compliance with federal, state, and local laws and regulations, Metropolitan Standard Practices, and temporary nature of hazardous materials handling would ensure that the proposed Project would not create a significant hazard to the public or the environment through upset and accident conditions involving the release of hazardous materials. Impacts would be less than significant.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. No, the proposed Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The nearest school to the proposed Project Area would be approximately one mile to the northwest. No schools are located within one-quarter mile of the proposed Project Area. The proposed Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No impact would occur.

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?

No Impact. No, the proposed Project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. No known hazardous material sites are located within or adjacent to the proposed Project Area, including sites that are on a list of hazardous materials sites complied pursuant to Government Code Section 65962.5 (Department of Toxic Substances Control 2023; State Water Resources Control Board 2023). Therefore, no impact would occur.

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?

Less-Than-Significant Impact. No, the proposed Project would not result in a safety hazard or excessive noise for people residing or working in the proposed Project Area due to an airport land use plan or location within two miles of a public airport of public use airport. The nearest airport is Redlands Municipal Airport, located approximately 1.5 miles south of the proposed Project. The proposed Project Area would not be located within the Redlands Municipal Airport Influence Area or Area of Special Compatibility Concern (City of Highland 2006b). The proposed Project would include temporary construction within the existing Foothill Pump Station facility. The proposed Project would not include habitable structures and construction employees would not experience impacts associated with airport safety and excessive noise from aircraft. Therefore, impacts would be less than significant.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less-Than-Significant Impact. No, the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The City of Highland General Plan Public Health, Safety, and Environmental Justice Element includes an Emergency Preparation and Response section, which includes information on emergency response facilities and evacuation routes. In the event of an extreme fire, flood, or other circumstances, evacuation may be necessary. To preserve the lives of Highland residents, it is important to ensure that the routes used for evacuation are unobstructed and in good condition. Depending on the hazard, evacuation routes in Highland may involve a variety of highways and arterials. Interstates and highways that could be used by residents to evacuate the area include Interstates 10, 15, and 215, as well as State Routes 30, 31, 38, 60, 66, and 210. Major east/west roads within Highland that could be used for evacuation include Greenspot Road, Base

Line Street, East Highland Avenue, and Pacific Street (City of Highland 2006b). The proposed Project Area would be located south of Greenspot Road which is identified as a possible evacuation route. Proposed Project construction would occur mainly within a Metropolitan right-of-way and would not permanently alter public roadways or change the existing access points at the proposed Project Area. Construction vehicles carrying construction equipment and materials would utilize local roadways and freeways to bring equipment and materials to the site. These activities would be temporary, during construction, and provide direct access to the proposed Project Area. The proposed Project would not require lane or road closures. Based on the temporary nature of the construction activities, the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less-Than-Significant Impact. No, the proposed Project would not expose people or structures to a significant risk of loss, injury or death involving wildfires. The proposed Project would not be located in or near a State Responsibility Area or lands classified as a Very High Fire Hazard Severity Zone (CAL FIRE 2023). The proposed Project would be located at the existing Foothill Pump Station facility and immediately south of the facility. As outlined in Appendix A the Project Contractor(s) would be required to comply with Metropolitan standard practices related to fire protection including requirements for standard exhaust control and muffling devices that would act as spark arrestors on gasoline- or diesel-powered construction machinery, and the presence of fire containment and extinguishing equipment on-site during construction activities. All vehicles would contain fire extinguishers, and staff are trained in fire suppression in accordance with Metropolitan's standard protocols. The proposed Project does not propose the construction of habitable structures. Following construction activities, maintenance of the Foothill Pump Station facility would be the same as current maintenance activities and would not result in the exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, impacts would be less than significant.

REFERENCES

California Department of Forestry and Fire Protection (CAL FIRE), 2023. Fire Hazard Severity Zones in State Responsibility Area. Available online at https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008. Accessed December 11, 2023.

California Department of Toxic Substances Control (DTSC). 2023. DTSC's Hazardous Waste and Substances Site List—Site Cleanup (Cortese List). Available: https://calepa.ca.gov/sitecleanup/corteselist/. Accessed December 12, 2023.

City of Highland, 2006b. General Plan *Public Health, Safety, and Environmental Justice Element*. March 2006. Available online at: https://www.cityofhighland.org/DocumentCenter/View/4193/Public-Health-Safety-and-Environmental-Justice-Element-PDF

State Water Resources Control Board (SWRCB), 2023. GeoTracker database. Available: https://geotracker.waterboards.ca.gov/. Accessed December 12, 2023.

3.10 Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Violate Regional Water Quality Control Board 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?	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Significance criteria established by CEQA Guidelines, Appendix G.

REGULATORY FRAMEWORK

The Clean Water Act (CWA) is the primary federal legislation governing water quality. Sections 303 and 304 of the CWA provide water quality standards, criteria, and guidelines. Section 402 of the CWA establishes the National Pollution Elimination Discharge System (NPDES), a permitting system for the discharge of pollutants (except for dredged or fill material) into Waters of the United States. The California State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCBs) administer the NPDES Project in California. Each RWQCB has Projects for implementing individual and general permits related to construction activities, municipal stormwater discharge, and various kinds of non-stormwater discharges.

The NPDES Project controls water pollution by regulating point sources that discharge pollutants into Waters of the United States. The NPDES Project is a federal project that has been delegated to the SWRCB

and the nine RWQCBs to implement and regulate. The majority of NPDES permits are issued by the RWQCBs, which ensure compliance with their permits through compliance inspections, monitoring report reviews, and enforcement actions, if necessary. In California, NPDES permits are also referred to as waste discharge requirements (WDR) that regulate discharges to waters of the United States.

The Porter-Cologne Water Quality Control Act is the primary water quality control act for the State of California. The Porter-Cologne Act is implemented by the SWRCB and the nine RWQCBs and applies to Waters of the State, which includes any surface water or groundwater, including saline waters, within the boundaries of the state (Water Code Section 13050(e). The Porter-Cologne Act requires a report of Water Discharge for any discharge of waste (liquid, solid, or otherwise) to land or surface waters that may impair beneficial use of surface or groundwater of the State. For discharges directly to surface water, an NPDES permit is required. For waste discharges to land (such as spoils disposal and storage), erosion from soil disturbance, or discharges to Waters of the State, Waste Discharge Requirements (WDRs) are required.

ANALYSIS OF IMPACTS

a. Violate Regional Water Quality Control Board water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less-Than-Significant Impact. No, the proposed Project would not violate RWQCB water quality standards or waste discharge requirements, or otherwise substantially degrade surface or ground water quality. The proposed Project would not involve work within surface waterbodies, as no surface waterbodies are present, or to groundwater, nor would it create waste that would be subject to regulation under a WDR. If groundwater is encountered and extraction is required, these construction activities would be temporary and short-term in nature. Earthmoving activities associated with the proposed Project would include excavation, trenching, grading, and construction over an area that would be more than one acre. These activities could expose soils to erosion processes; the extent of erosion, if any, would vary depending on slope steepness/stability, vegetation/cover, concentration of runoff, and weather conditions.

Projects that disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one acre or more, are required to obtain coverage under the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order 2022-0057-DWQ, NPDES No. CAS000002 (Construction General Permit). Construction activity subject to this permit includes clearing, grading, excavation, and stockpiling of excavated soil. The proposed Project would be required to prepare and implement a SWPPP. Limited quantities of common materials such as vehicle/equipment fuels/lubricants and sealants would be used during construction. This use would include standard measures to ensure appropriate handling (e.g., temporary containment to avoid spills), proper disposal of associated wastes, and describe BMPs to control run-on and runoff from the construction site. Following completion of construction, the proposed Project Area would be returned to pre-Project conditions in areas where underground facilities are constructed. Operations of the facility would be similar to existing conditions and would be implemented by existing Metropolitan staff. Compliance with the NPDES Construction General Permit, required SWPPP, and identified BMPs would ensure that construction and operation of the proposed Project would not violate water quality standards or waste discharge requirements.

As shown in Appendix A, per Metropolitan's Standard Practices, any Project Contractor(s) shall not create a nuisance or pollution as defined in the California Water Code, or cause a violation of any applicable water quality standards for receiving waters, as required by the CWA. Therefore, the potential for proposed Project activities to violate RWCQB water quality standards, waste discharge requirements or cause erosion or the downstream transport of sediment (sedimentation) that could adversely affect water quality would be less than significant.

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?

No Impact. No, the proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the proposed Project may impede sustainable groundwater management of the basin. The proposed Project includes implementation of an intertie connection between the Inland Feeder and Foothill Pump Station through construction of pipelines, vaults, and surge tanks. The proposed Project would not affect or propose the use of groundwater. The proposed Project would not result in any increased use or extraction of local groundwater. In addition, no sole source aquifers would be located within the proposed Project Area (US EPA 2023). Therefore, there would be no impact.

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?

iv) Impede or redirect flood flows?

Less-Than-Significant Impact. No, the proposed Project would not substantially alter the existing drainage pattern of the site or area in a manner that would result in substantial erosion on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff water; or impede or redirect flood flows. The proposed Project is an intertie connection between the Inland Feeder and Foothill Pump Station through construction of pipelines, vaults, and surge tanks. Construction of the proposed Project would temporarily alter the localized drainage pattern in the proposed Project Area due to ground-disturbing activities, such as grading, trenching, and excavation. Such alternations in the drainage pattern may temporarily result in erosion or siltation and/or increase the rate or amount of surface runoff if substantial drainage is rerouted. As discussed in *Geology and Soils*, potential construction-related erosion and sedimentation impacts would be avoided or reduced below a level of significance through conformance with the existing NPDES Construction General Permit and related requirements). Specifically, the proposed Project would implement a SWPPP and Project-specific BMPs would be identified to control erosion and

sedimentation impacts. BMPs would be implemented, as required, during the construction of the proposed Project to ensure that erosion and sedimentation impacts would be less than significant.

As discussed above, construction of the proposed Project could temporarily alter seasonal flow within the proposed Project Area due to ground disturbing activities. However, with implementation of the required Project-specific SWPPP and associated BMPs, construction of the proposed Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide additional sources of polluted runoff. Metropolitan would also comply with their Standard Practices, (Appendix A) requiring that the Contractor not allow any equipment or vehicle storage within any drainage course or channels and any material placed in areas where it could be washed into a drainage course or channel would be removed prior to the rainy season. Once construction is completed, the components of the proposed Project located within a flood zone would be located underground and the proposed Project Area would be returned to similar existing conditions. Therefore, the proposed Project would not impede or redirect flood flows and impacts would be less than significant.

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

Less-Than-Significant Impact. No, the proposed Project would not risk release of pollutants due to inundation in a flood hazard, tsunami, or seiche zone. The southern portion of the proposed Project Area, generally outside of the existing facility, would be located within an area determined by FEMA to be Zone X, an area protected from flooding from the 100-year storm event (FEMA 2016). Components of the proposed Project that would be located within the flood zone include a portion of the discharge pipeline and one vault structure. Once constructed, the proposed Project components within the flood zone would be located mainly belowground. Due to the components being located underground, impacts would be less than significant relative to being located in a flood zone.

The proposed Project Area would be located approximately 75 miles away from the Pacific Ocean and would not be subject to tsunamis. Seiches are defined as wave-like oscillatory movements in enclosed or semi-enclosed bodies of water such as lakes or reservoirs and are most typically associated with seismic activity. The nearest lake to the proposed Project Area would be the Seven Oaks Reservoir located approximately 2.5 miles to the northeast. According to the United States Geological Survey (USGS) Flood Inundation Mapper, the proposed Project Area would be located outside of the inundation zone (USGS 2024). During proposed Project construction activities, minor pollutants would be present at the proposed Project Area. The proposed Project would not result in impacts associated with flood, tsunami, or seiche hazards during long-term operation of the proposed Project, as operations of the Foothill Pump Station facility would be a continuation of existing activities at the facility and the proposed Project would not result in operational changes at the facility. Therefore, impacts due to potential release of pollutants due to proposed Project inundation in a flood hazard, tsunami, or seiche zones would be less than significant.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less-Than-Significant Impact. No, the proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The Project consists of temporary construction activities to implement an intertie connection between the Inland Feeder and Foothill Pump Station through construction of pipelines, vaults, and surge tanks, and would not require

the use of groundwater and therefore would not conflict with a sustainable groundwater management plan. The proposed Project would require preparation of a SWPPP, including implementation of BMPs to minimize soil erosion and water quality impacts. The proposed Project would not result in impacts associated with groundwater recharge or a groundwater management plan. With conformance to applicable regulatory requirements, including the NPDES Project, preparation of a SWPPP, and implementation of BMPs, impacts would be less than significant.

REFERENCES

Federal Emergency Management Agency (FEMA), 2016. FEMA Flood Map Service Center, Available online at: https://msc.fema.gov/portal/home, Accessed on February 23, 2024.

U.S. Environmental Protection Agency (US EPA), 2023. Map of Sole Source Aquifer Locations, Available online at: https://www.epa.gov/dwssa/map-sole-source-aquifer-locations, Accessed on February 23, 2024.

United States Geological Survey (USGS), 2024. USGS Flood Inundation Mapper, Available online at: https://fim.wim.usgs.gov/fim/, Accessed on March 12, 2024.

3.11 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?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

ANALYSIS OF IMPACTS

a. Physically divide an established community?

No Impact. No, the proposed Project would not physically divide an established community. The proposed Project would be located mainly within the existing Foothill Pump Station facility, with a small portion of the construction of the discharge pipeline and one vault being constructed belowground just to the south of the facility. The Project consists of improvements to an existing Metropolitan facility and does not include new components that would physically divide a community. Temporary work staging areas and construction areas would occur along or within the proposed Project Area. The proposed Project would not result in changes to the existing land use or any surrounding land use. Therefore, no impact would occur.

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?

No Impact. No, the proposed Project would not 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. The proposed Project would be located under the jurisdiction of the City of Highland. There are no land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect at or within the vicinity of the proposed Project Area. Therefore, the proposed Project would not cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect and no impact would occur.

3.12 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?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

ANALYSIS OF IMPACTS

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?

No Impact. No, the proposed Project would not 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. The proposed Project would be located within the existing Foothill Pump Station facility and contains existing Metropolitan infrastructure. The City of Highland, due to its large washes and stream channels, contains regionally significant construction aggregate and mineral resources. The primary minerals found in the area are iron, decorative rocks, clay, limestone, sand and gravel (City of Highland 2006a). The proposed Project Area would be located mainly on developed land within the existing Foothill Pump Station facility, with a small portion of the footprint extending to the south. The proposed Project Area would not be utilized for mineral extraction activities, nor is it planned for mineral extraction activities, and would not result in the loss of availability of known mineral resources. Therefore, no impact would occur.

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?

No Impact. No, the proposed Project would not 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. The proposed Project would be located within the existing Foothill Pump Station facility which contains existing Metropolitan infrastructure. The proposed Project Area would not be used or zoned for mineral resource recovery (USGS 2023). The proposed Project would not result in loss of known mineral resources of local importance. Therefore, no impact would occur.

REFERENCES

City of Highland, 2006a. General Plan Conservation and Open Space Element. Available: https://www.cityofhighland.org/DocumentCenter/View/148/Conservation-and-Open-Space-Element-PDF, accessed December 14, 2023.

United States Geological Survey (USGS), 2023. Mineral Resources On-Line Spatial Data Interactive Map. Available online at http://mrdata.usgs.gov/general/map.html. Accessed on December 8, 2023.

3.13 Noise

Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne 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?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

This section provides an analysis of proposed Project impacts associated with noise and is based on Noise emissions calculations and modeling, attached as Appendix F.

OVERVIEW OF NOISE AND VIBRATION

Sound is a vibratory disturbance created by a moving or vibrating source that is capable of being detected by the hearing organs. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (Caltrans 2013).

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response. Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dB; dividing the energy in half would result in a 3 dB decrease (Crocker 2007).

Vibration is a unique form of noise because its energy is carried through buildings, structures, and the ground, whereas sound is simply carried through the air. Thus, vibration is generally felt rather than heard. Some vibration effects can be caused by noise (e.g., the rattling of windows from passing trucks). Typically, groundborne vibration generated by manmade activities attenuates rapidly as distance from the source of the vibration increases. Groundborne vibration is a concern almost exclusively inside buildings and is based on a number of factors, including foundation type, building construction characteristics, and acoustical adsorption of building materials (Federal Transit Administration [FTA] 2018).

Vibration amplitudes are usually expressed in peak particle velocity (PPV) for buildings and Root Mean Square (RMS) vibration velocity for people and are normally described in inches per second (in/sec). PPV

is defined as the maximum instantaneous positive or negative peak of a vibration signal (Caltrans 2020). RMS is generally the equivalent to 71 percent of the PPV. Thus, evaluating human annoyance to vibration usually results in a more restrictive vibration limit than structural damage limits. Table 3.13-1 summarizes the vibration limits recommended by the American Association of State Highway and Transportation Officials to avoid structural damage to buildings.

TABLE 3.13-1
MAXIMUM VIBRATION LEVELS FOR PREVENTING BUILDING DAMAGE

Type of Situation	Vibration Level (in/sec PPV)
Historic sites or other critical locations	0.1
Residential buildings, plastered walls	0.2–0.3
Residential buildings in good repair with gypsum board walls	0.4–0.5
Engineered structures, without plaster	1.0–1.5

NOTES: in/sec (inches per second), PPV (peak particle velocity)
SOURCE: ESA 2024

The vibration annoyance potential criteria recommended for use by Caltrans, which are based on the general human response to different levels of groundborne vibration velocity levels, are described in Table 3.13-2.

TABLE 3.13-2
VIBRATION ANNOYANCE POTENTIAL CRITERIA FOR HUMANS (IN/SEC PPV)

Human Response	Transient Sources	Continuous/Frequent Intermittent Sources
Severe	2.0	0.4
Strongly Perceptible	0.9	0.10
Distinctly Perceptible	0.25	0.04
Barely Perceptible	0.04	0.01

NOTES: in/sec (inches per second), PPV (peak particle velocity)
SOURCE: Caltrans 2020

REGULATORY FRAMEWORK

National Institute for Occupational Safety and Health

The National Institute for Occupational Safety and Health (NIOSH) establishes Recommended Exposure Limits (REL) for noise based on the best available science and practice. The NIOSH REL for noise is 85 decibels, using the A-weighted frequency response (dBA) over an 8-hour average, usually referred to as Time-Weighted Average (TWA). Exposures at or above this level are considered hazardous.

California Government Code

California Government Code Section 53091(d) states that building ordinances of a county or city shall not apply to the location or construction of facilities for the production, generation, storage, treatment, or transmission of water, wastewater, or electrical energy by a local agency.

California Government Code Section 53091(e) states that zoning ordinances of a county or city shall not apply to the location or construction of facilities for the production, generation, storage, treatment, or transmission of water, or for the production or generation of electrical energy, facilities that are subject to Section 12808.5 of the Public Utilities Code, or electrical substations in an electrical transmission system that receives electricity at less than 100,000 volts.

City of Highland Municipal Code

The municipal code sets forth the standards, guidelines and procedures concerning the regulation of noise use in the City of Highland. Specifically, the code includes Title 8, Health and Safety, which includes Chapter 8.50, Noise Control, and Title 16, Land Use and Development. Title 8 directly regulates noise while Title 16 lays out land use standards that indirectly regulate noise-generating and sensitive land uses. These regulations are intended to implement the goals, objectives and policies of the General Plan; protect property values and the health and general well-being of the public; and ensure that any negative effects of noise are minimized or completely avoided. The City of Highland categorizes land uses into designated noise zones to assign appropriate interior and exterior noise standards. The appropriate interior and exterior noise standards are identified in Tables 3.13-3 and 3.13-4, respectively.

TABLE 3.13-3
CITY OF HIGHLAND INTERIOR NOISE STANDARDS

Type of Land Use	CNEL (dBA)
Residential	45
Educational/churches, other institutional uses	45
General offices	50
Retail stores, restaurants	55
Manufacturing, warehousing	65
Agricultural	55
Sand and Gravel Operations	75

NOTES: CNEL – community noise equivalent level, dBA – A-weighted scale
SOURCE: Chapter 8.50.Noise Control, City of Highland Municipal Code

TABLE 3.13-4
CITY OF HIGHLAND EXTERIOR NOISE STANDARDS

Type of Land Use	Time Interval	CNEL (dBA)
Residential	10:00 p.m. – 7:00 a.m.	55
	7:00 a.m. – 10:00 p.m.	60
Agricultural/Equestrian	10:00 p.m. – 7:00 a.m.	60
	7:00 a.m. – 10:00 p.m.	65
Commercial	10:00 p.m. – 7:00 a.m.	65
	7:00 a.m. – 10:00 p.m.	70
Manufacturing or Industrial	Any Time	75
Open Space	Any Time	75

NOTES: CNEL – community noise equivalent level, dBA – A-weighted decibel scale
SOURCE: Chapter 8.50, Noise Control, City of Highland Municipal Code

City of Highland Municipal Code Chapter 8.50.060 Exemptions, lists the activities and noise sources that shall not be subject to the provisions of Title 8.50, Noise Control. Chapter 8.50.060(K) states construction, operation, maintenance and repair of equipment, apparatus or facilities of the park and recreation department, public work projects or essential public services and facilities, including trash collection and those of public utilities subject to the regulatory jurisdiction of the Public Utilities Commission are exempt from Chapter 8.50, Noise Control.

City of Highland Municipal Code Chapter 15.48.020 establishes the allowable hours of operation of construction activities where it states construction activities shall not commence prior to 7:00 a.m. and construction activity shall terminate no later than 7:00 p.m. Monday through Saturday with no construction activities performed during city or federal observed holidays. City of Highland Municipal Code 15.48.020(B)(4) exempts construction activities not regulated by the City of Highland from the established construction hours.

METHODOLOGY

The proposed Project construction would take approximately 12 months to complete, occurring over a 31-month period, with a break in between two construction stages. Stage 1 would occur from approximately January 2025 through November 2025, Stage 2 would occur between approximately fall 2026 through July 2027 (see Section 1.5.1, *Schedule*, for additional details). Construction activities would include pipeline trenching and installation vault and surge tank excavation, and vault and surge tank installation for both the supply and discharge pipelines. Project construction would require soil import and export during the pipeline trenching and vault and surge tank excavation components and concrete import during the vault and surge tank installation components. Construction equipment would include air compressors, cement and mortar mixers, cranes, excavators, forklifts, graders, generator sets, plate compactors, sweeper/scrubbers, tractor/loader/backhoes, and welders. Assumptions, including detailed phasing, construction employee vehicle, haul truck, concrete truck and vendor trucks and equipment list and modeling output are included in Appendix F. Noise from on-site construction activities would be generated by the use of equipment involved during various stages of the construction activities. The noise levels generated by construction equipment would vary depending on factors such as the type and number of equipment, the specific model (horsepower rating), the construction activities being performed, and the maintenance condition of the equipment. Individual pieces of construction equipment anticipated to be used during the proposed Project construction could produce maximum noise levels of 73 dBA to 85 dBA Lmax[12] at a reference distance of 50 feet from the noise source, as shown in Table 3.13-5. These maximum noise levels would occur when equipment is operating under full power conditions. The estimated usage factor for the equipment is also shown in Table 3.13-5. The usage factors are based on the Federal Highway Administration (FHWA) Roadway Construction Noise Model User's Guide (FHWA 2006). Table 3.13-5 below provides a list of the anticipated construction equipment for the Project and typical noise emission levels at a distance of 50 feet.

[12] Lmax: The maximum, instantaneous noise level.

TABLE 3.13-5
CONSTRUCTION EQUIPMENT AND ESTIMATED NOISE LEVELS

Source	Reference Noise Level at 50 feet (dBA Lmax)	Estimated Usage Factor (%)
Air Compressor	80	40%
Cement and Mortar Mixer	80	50%
Cranes	85	16%
Excavator	85	40%
Forklifts	75	10%
Graders	85	40%
Generator Sets	82	50%
Plate Compactors	80	20%
Sweeper/Scrubbers	80	10%
Tractors/Loaders/Backhoes	80	40%
Welders	73	40%

NOTES: dBA – A-weighted decibel scale, Lmax – maximum, instantaneous noise level
SOURCE: FHWA 2006

To characterize construction-period noise levels, the hourly Leq noise level associated with each construction component is estimated based on the quantity, type, and usage factors for each type of equipment used during each construction component and are typically attributable to multiple pieces of equipment operating simultaneously.[13] Over the course of a construction day, the highest noise levels would be generated when multiple pieces of construction equipment are operated concurrently. The estimated noise levels at noise sensitive receptors were calculated using the FHWA's RCNM and were based on a maximum concurrent operation of construction equipment, which is considered a worst-case evaluation.[14] This is considered a worst-case scenario because the Project would typically use less equipment simultaneously, and as such would generate lower noise levels during construction.

ANALYSIS OF IMPACTS

a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less-Than-Significant Impact with Mitigation Incorporated. No, the proposed Project would not generate 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. Metropolitan, as a regional public water purveyor and utility, is exempt from local zoning and building ordinances. Despite this exemption from local land use planning jurisdiction, for purposes of full disclosure of potential impacts on the environment from the Project, the Project's compatibility with relevant general plans and local policies was analyzed.

[13] Leq = (Equivalent Energy Level). The sound level corresponding to a steady-state sound level containing the same total energy as a time-varying signal over a given sample period, typically one, eight or 24 hours.

[14] FHWA, Roadway Construction Noise Model, 2006.

Metropolitan is exempt from compliance with City of Highland Municipal Code Chapter 8.50, Noise Control under City of Highland Municipal code 8.50.060(K) that exempts construction, operation, maintenance and repair of equipment, apparatus or facilities of the park and recreation department, public work projects or essential public services and facilities, including trash collection and those of public utilities subject to the regulatory jurisdiction of the Public Utilities Commission. Metropolitan is also exempt from City of Highland Municipal Code 15.48.020, where it states construction activities shall not commence prior to 7:00 a.m. and construction activity shall terminate no later than 7:00 p.m. Monday through Saturday with no construction activities performed during city or federal observed holidays, under City of Highland Municipal Code 15.48.020(B)(4) that exempts construction activities not regulated by the City of Highland from the established construction hours. Nevertheless, noise impacts are further analyzed herein. Construction activities associated with the proposed Project would be limited to Mondays through Fridays, 7:00 a.m. to 4:00 p.m., with occasional work on Saturday and nighttime activities that may be required, which would be consistent with the City's codes. Construction activities would not occur on Sundays or federal holidays. The nearest noise sensitive receptors to the proposed Project Area are R1: single-family residences located approximately 30 feet to the west past Weaver Street, R2: a single-family residence approximately 40 feet to the east along Cone Camp Road, R3: single-family residences located approximately 250 feet to the north across Greenspot Road, and R4: a single-family residence approximately 275 feet to the west of the proposed Project Area south of Greenspot Road.[15]

Project construction would be located approximately 30 feet from the nearest noise sensitive receptors. Noise levels attenuate (reduce) from a source at a rate between 6 dBA for acoustically "hard" sites and 7.5 dBA for "soft" sites for each doubling of distance from the reference measurement, as their energy is continuously spread out over a spherical surface (e.g., for hard surfaces, 80 dBA at 50 feet attenuates to 74 dBA at 100 feet, 68 dBA at 200 feet, etc.). Noise modeling was conducted based on the types of equipment that would be used for construction of the Project. To characterize construction-period noise levels more accurately, the average (Leq) noise levels associated with each construction stage at the listed sensitive receptors above is provided in Table 3.13-6. These average noise levels are based on the quantity, type, and usage factors for each type of equipment that would likely be used during each construction stage and are typically attributable to multiple pieces of equipment operating simultaneously.

As shown in Table 3.13-6, the Project construction noise levels would range from approximately 68 to 89 dBA at the sensitive receptor locations. As described in detail above, Metropolitan is exempt from the City's noise regulations for construction. However, exposure of sensitive receptors would potentially exceed the NIOSH's 85 dBA REL over an 8-hour period. Exposures at or above this level are considered hazardous resulting in a potentially significant impact. As the proposed Project construction would result in temporary increases in ambient noise that would meet or exceed the thresholds of significance at nearby noise sensitive receptors, construction noise impacts would be potentially significant, and mitigation measures would be required.

[15] The distance to vibration sensitive receptors is based on the distance to the receptor building footprint from the Project area to the receptor building footprint, whereas the distance to distance to noise sensitive receptors is based on the distance to the receptor property line to the Project area. Thus, for the same sensitive receptor, the distance to determine vibration impacts is generally greater than the distance to determine noise impacts.

TABLE 3.13-6
CONSTRUCTION AVERAGE LEQ NOISE LEVELS BY DISTANCE AND CONSTRUCTION COMPONENT

	Sound Level in dBA (Leq) at Sensitive Receptor			
Construction Component	**R1**	**R2**	**R3**	**R4**
Supply Connection / Discharge Connection Components				
Pipeline Trenching and Installation	89	86	71	70
Vault Structure Excavation	87	84	69	68
Vault Structure Installation	87	84	69	68
Vault Structure Installation – Concrete	87	84	69	68
Surge Tank Excavation	89	86	71	70

NOTE:
Assumes a hard surface propagation path drop-off rate of 6 dB per doubling of distance (sound level at distance X = sound level at 50 feet - 20LOG [x/50'), which is appropriate for use in characterizing point-source (such as construction equipment) sound attenuation.
SOURCE: ESA 2024

Implementation of **Mitigation Measure NOI-1**, as described below, would reduce the Project's on-site construction noise impacts at noise sensitive receptors. Table 3.13-7 presents the estimated, conservative construction noise levels at the off-site receptor locations with implementation of mitigation measures. As indicated in Table 3.13-7, the construction noise levels at all receptor locations would be reduced below the significance threshold. Therefore**,** with implementation of **Mitigation Measure NOI-1**, impacts from construction noise would be less than significant.

TABLE 3.13-7
CONSTRUCTION AVERAGE LEQ NOISE LEVELS BY DISTANCE AND CONSTRUCTION COMPONENT WITH MITIGATION

	Sound Level in dBA (Leq) at Sensitive Receptor			
Construction Component	**R1**	**R2**	**R3**	**R4**
Supply Connection Components				
Pipeline Trenching and Installation	84	81	71	70
Vault Structure Excavation	82	79	69	68
Vault Structure Installation	82	79	69	68
Vault Structure Installation – Concrete	82	79	69	68
Surge Tank Excavation	84	81	71	70
Discharge Connection Components				
Pipeline Trenching and Installation	84	81	71	70
Vault Structure Excavation	82	79	69	68
Vault Structure Installation	82	79	69	68
Vault Structure Installation – Concrete	82	79	69	68
Surge Tank Excavation	84	81	71	70

NOTE:
Assumes a hard surface propagation path drop-off rate of 6 dB per doubling of distance (sound level at distance X = sound level at 50 feet - 20LOG [x/50]), which is appropriate for use in characterizing point-source (such as construction equipment) sound attenuation.
SOURCE: ESA 2024

Regarding construction truck and vehicle trips, construction employee commutes and trucks hauling materials and debris to and from the proposed Project Area would be the primary generator of off-site mobile sources. A maximum of approximately 18 employee trips per day, and up to 44 haul truck trips, resulting in approximately 6 haul truck trips per hour, and 6 material truck trips per day during construction (based on the air quality modeling included in Appendix B). Therefore, only a minimal increase in traffic would be entering and leaving the site would occur at any given time of construction activities. Construction of the proposed Project would temporarily generate additional truck and vehicle trips within San Bernardino and the regional circulation system. Due to the proposed Project's location, construction traffic would primarily utilize Greenspot Road to Cone Camp Road. However, as noted above, traffic levels would not substantially increase and would be temporary in nature and traffic levels would return to pre-construction conditions once construction is complete. Thus, the proposed Project's construction traffic noise impact would be less than significant.

Operational and maintenance noise would be approximately the same as that already occurring at the proposed Project Area which includes the SBVMWD Foothill Pump Station. In addition, operation and maintenance activities would generally occur between 7 am to 4 pm. Metropolitan is exempt from compliance with the local San Bernardino County noise abatement and control regulations under San Bernardino County Code Section 24.0707(e) that states that noise sources associated with maintenance and repair operations conducted by utility companies or their contractors which are deemed necessary to serve the best interest of the public and to protect the public health, welfare, and safety are exempt, including both stationary and mobile sources. Furthermore, Metropolitan is exempt from compliance with City of Highland Municipal Code Chapter 8.50, Noise Control under City of Highland Municipal code 8.50.060(K) that exempts construction, operation, maintenance and repair of equipment, apparatus or facilities of the park and recreation department, public work projects or essential public services and facilities, including trash collection and those of public utilities subject to the regulatory jurisdiction of the Public Utilities Commission from Chapter 8.50, Noise Control of the City of Highland Municipal Code. Thus, while the proposed Project and associated operational activities are exempt from applicable County and City codes, the proposed Project would not be expected to generate significant operational noise. The stationary equipment associated with the proposed Project would mainly be located below ground. Surge tanks would be located aboveground and would not be a source of noise. Thus, on-site noise sources from proposed Project operations would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the proposed Project in excess of established standards.

As described above, operations and maintenance activities at the Foothill Pump Station facility, including the frequency of staff visits, maintenance, shutdowns, would be similar to existing conditions once construction activities are completed. Operational activities associated with the proposed Project would involve periodic vehicle trips by Metropolitan employees for maintenance activities and the proposed Project would not increase the number of Metropolitan employees required for operations and maintenance activities. On days of proposed Project maintenance trips, proposed Project related trips would increase average daily trips on these roads by approximately 2 one-way vehicle trips, which would result in a minimal increase in traffic on proposed Project Area roadways. Consequently, proposed Project maintenance trips would not result in a perceptible increase in roadway noise, and this impact would be less than significant.

Mitigation Measures

NOI-1: Temporary Noise Barriers. Temporary noise barriers shall be used along the western and eastern property boundaries to block the line-of-sight between the construction equipment and the noise sensitive receptors.

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

Less-Than-Significant Impact. No, the proposed Project would not generate excessive groundborne vibration or groundborne noise levels. Construction activities would require the use of heavy equipment and heavy truck haul trips that may produce short-term vibration. Typically, groundborne vibrations generated by construction activities attenuate rapidly with distance from the source. Therefore, construction vibration issues are typically confined to short distances from the source. Additionally, groundborne vibration is a concern almost exclusively inside buildings (FTA 2018).

The nearest vibration sensitive receptor to the proposed Project Area would be a residential use located approximately 50 feet from the proposed Project Area. The distance to vibration sensitive receptors is based on the distance from the Project area to the receptor building footprint, whereas the distance to noise sensitive receptors is based on the distance to the receptor property line to the Project area. Thus, for the same sensitive receptor, the distance to determine vibration impacts is generally greater than the distance to determine noise impacts. All other vibration sensitive receptors are located at greater distances from the proposed Project Area and would be less impacted by proposed Project vibration impacts. Proposed Project work would be temporary in nature, with activities occurring in a specific location for a short period of time. The longest construction component, surge tank installation, would occur over a two-month period. The proposed Project would utilize construction equipment such as use of loaded trucks, which would generate groundborne vibration during construction activities. The vibration velocities at various distances for loaded trucks that can generate perceptible vibration levels are identified in Table 3.13-8. Based on the information presented in Table 3.13-8, vibration velocities at the nearest sensitive receptor would be 0.027 PPV (in/sec) at 50 feet from the source of activity. At this distance, groundborne vibration generated by proposed Project construction would be below the American Association of State Highway and Transportation Official's building damage vibration level thresholds for residential buildings, as well as below the most stringent vibration threshold for historic sites or other critical locations. In addition, at this distance, groundborne vibration generated by proposed Project construction would be above the barely perceptible, but below the distinctly perceptible thresholds for continuous/frequent intermittent sources from Caltrans' Vibration Annoyance Potential Criteria for Humans. Therefore, proposed Project vibration impacts from heavy construction equipment impacts would be less than significant.

TABLE 3.13-8
VIBRATION VELOCITIES FOR CONSTRUCTION EQUIPMENT

	Approximate PPV (in/sec)				
Equipment	**25 Feet**	**50 Feet**	**60 Feet**	**75 Feet**	**100 Feet**
Loaded Trucks	0.076	0.027	0.020	0.015	0.010

Truck haul trips would occur during the construction period. These trucks would utilize area roadways in the proposed Project vicinity. Trucks would utilize the Greenspot Road which is paved and then turn onto

Cone Camp Road which is also paved. The nearest vibration sensitive receptors to the proposed Project Area are single-family residences located approximately 50 feet to the west of the Project Area, past Weaver Street.[16] All other vibration sensitive receptors are located at greater distances from the proposed Project Area, and would be less impacted by proposed Project vibration impacts. Sensitive receptors along the construction route would be subject to temporary effects; however, these effects would be short-term during the construction period; and similar to other heavy vehicles passing on existing roadways.

Proposed Project operational activities would not generate excessive groundborne vibration or groundborne vibration noise levels. The proposed Project's day-to-day operations would include typical commercial-grade stationary mechanical equipment, which would produce vibration at low levels that would not cause structural damage, vibration impacts, or human annoyance impacts to the proposed Project structures or to the off-site environment. Groundborne vibration generated by such equipment would generate approximately up to 0.005 in/sec PPV adjacent to the proposed Project Area (FTA 2018).[17] In addition, the primary sources of transient vibration would result from periodic vehicle trips by Metropolitan employees for maintenance activities where maintenance activities at the Foothill Pump Station facility, including the frequency of staff visits, maintenance, shutdowns, would be similar to existing conditions once construction activities are completed. Operations and maintenance activities for the Inland Feeder intertie would require approximately one to two vehicles during a day with maintenance activities that would visit the proposed Project Area. Therefore, structural damage and human annoyance vibration impacts from the proposed Project operation would be less than significant.

Based on the above discussions, the proposed Project would not generate excessive groundbourne vibration or groundborne noise levels at sensitive receptors. Construction and operational groundbourne vibration and noise levels would result in less-than-significant impacts.

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, expose people residing or working in the Project area to excessive noise levels?

No Impact. No, the proposed Project would not expose people residing or working in the proposed Project Area to excessive noise levels. The nearest airport to the proposed Project Area would be the Redlands Municipal Airport, located approximately 1.5 miles south of the proposed Project Area. The proposed Project consists of temporary construction activities and would not result in the presence people working in the area beyond the temporary construction period, which would take approximately 12 months to complete, occurring over a 31-month period, with a break in between two construction stages (see Section 1.5.1*, Schedule*, for additional details). Additionally, the proposed Project would not result in people residing in the proposed Project Area. Based on the lack of people that would reside or work in the area as a result of the proposed Project, no impact would occur.

[16] The distance to vibration sensitive receptors is based on the distance from the Project area to the receptor building footprint, whereas the distance to noise sensitive receptors is based on the distance to the receptor property line to the Project area. Thus, for the same sensitive receptor, the distance to determine vibration impacts is generally greater than the distance to determine noise impacts.

[17] This vibration estimate is based on data presented in the USDOT Federal Transit Administration, 2018

REFERENCES

Crocker, Malcolm J. Crocker (Editor), 2007. Handbook of Noise and Vibration Control Book, ISBN: 978-0-47139599-7, Wiley-VCH, October.

Caltrans (California Department of Transportation), 2013. Technical Noise Supplement to the Traffic Noise Analysis Protocol. September. Accessed April 3, 2024. Available: Technical Noise Supplement to the Caltrans Traffic Noise Analysis Protocol.

Caltrans (California Department of Transportation), 2020. Transportation and Construction Vibration Guidance Manual. April. Accessed April 3, 2024. Available: https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf

FTA (Federal Transit Administration), 2018. Transit Noise and Vibration Impact Assessment Manual. September. Accessed April 3, 2024. Available: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.

FHWA (Federal Highway Administration), August 2006. Roadway Construction Noise Model User's Guide. Accessed April 3, 2024. Available: https://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/

3.14 Population and Housing

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

Significance criteria established by CEQA Guidelines, Appendix G.

ANALYSIS OF IMPACTS

a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. No, the proposed Project would not directly or indirectly induce substantial unplanned growth, either directly or indirectly. The proposed Project does not propose construction of new homes or businesses. The proposed Project would include construction of an intertie connection between the Inland Feeder and Foothill Pump Station through construction of pipelines, vaults, and surge tanks. The proposed Project is a water infrastructure project that would not increase water supply. The proposed Project would allow for greater water infrastructure reliability by improving the water distribution system flexibility to operate more efficiently in both wet years and under drought conditions.. There would be no construction of habitable or occupied structures. Operations and maintenance activities would remain similar to existing and would not require additional Metropolitan employees. Thus, the proposed Project would not directly or indirectly induce substantial unplanned population growth, and no impact would occur.

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. No, the proposed Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. The proposed Project would be located along existing Metropolitan infrastructure and is owned by Metropolitan. The proposed Project would include construction of an intertie connection between the Inland Feeder and Foothill Pump Station through construction of pipelines, vaults, and surge tanks. The majority of the proposed Project construction would occur within the existing Foothill Pump Station facility. The proposed Project does not propose occupied dwelling units. As such, the proposed Project would not displace any people or housing, and no impact would occur.

3.15 Public Services

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

Significance criteria established by CEQA Guidelines, Appendix G.

ANALYSIS OF IMPACTS

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

a. Fire protection?

b. Police protection?

c. Schools?

d. Parks?

e. Other public facilities?

No Impact. No, the proposed Project would not result in substantial adverse physical impacts associated with the provision of fire protection services, police protection services, schools, parks, and other public facilities. The proposed Project would include construction of an intertie connection between the Inland Feeder and Foothill Pump Station through construction of pipelines, vaults, and surge tanks. Operation and maintenance associated with the proposed Project would be similar to existing conditions. As discussed in Population and Housing, the proposed Project would not directly or indirectly induce population growth and thus would not increase demand for fire protection services, police protection services, schools, parks, or other public facilities. Thus, the proposed Project would not result in a need for new or physically altered fire protection services, police protection services, schools, parks, or other public facilities to maintain acceptable service ratios, response times, or other performance objectives, and no impact would occur.

3.16 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?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

ANALYSIS OF IMPACTS

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?

No Impact. No, the proposed Project would not 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. As discussed in *Population and Housing*, the proposed Project is a water infrastructure project that would not increase water supply. The proposed Project would allow for greater water infrastructure reliability by improving the water distribution system flexibility to operate more efficiently in both wet years and under drought conditions. Therefore, the proposed Project would not increase water supply to the region or otherwise indirectly induce population growth. As no population growth would occur, the proposed infrastructure improvements would not result in increased use of existing neighborhood and regional parks and would not result in substantial deterioration of existing recreational facilities. No impact would occur.

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?

No Impact. No, the proposed Project would not include recreational facilities or require the construction or expansion of recreational facilities. The proposed Project would not include growth-inducing components. The proposed Project would not include the construction of recreational facilities and no expansion of recreational facilities would occur. No impact would occur.

3.17 Transportation

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with a Project, 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?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

ANALYSIS OF IMPACTS

a. Conflict with a project, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

No Impact. No, the proposed Project would not conflict with a project, plan, ordinance, or policy addressing the circulation system. The San Bernardino County Transportation Authority's Transportation Plan Update of 2021 identifies no major improvements to Greenspot Road. The City of Highland Circulation Element of the General Plan identifies Greenspot Road as a Major Highway and identifies goals and policies to maintain roads and level of service. The proposed Project would include construction of an intertie connection between the Inland Feeder and Foothill Pump Station through construction of pipelines, vaults, and surge tanks and would be located within a Metropolitan right-of-way. The proposed Project would be accessed via Greenspot Road and Cone Camp Road, but would not involve construction within these roadways or increase traffic in ways that would increase delays. Any operations and maintenance activities to the Inland Feeder and new interconnection pipelines would be similar to existing conditions once construction activities are completed. The proposed Project would result in temporary traffic trips on local roadways during the construction period, but would not result in any changes to transit, roadways, bicycle systems, or pedestrian facilities. As a result, the proposed Project would not conflict with any project, plan, ordinance, or policy related to transit, roadway, bicycle, or pedestrian facilities in the vicinity of the proposed Project Area, and no impact would occur.

b. Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less-Than-Significant Impact. No, the proposed Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). The Governor's Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* prepared in 2018, provides screening thresholds to screen out less-than-significant Vehicle Miles Traveled (VMT) impacts using project size, maps, transit availability, and the provision of affordable housing. Although the proposed Project is not a land use development project, OPR identifies a screening threshold for small projects, which indicates that

projects that generate fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact. The proposed Project would include construction of an intertie connection between the Inland Feeder and Foothill Pump Station through construction of pipelines, vaults, and surge tanks. The proposed Project would generate temporary construction traffic trips over the course of the construction period. Construction activities would typically occur Monday through Friday during daytime hours, although work may be conducted on Saturdays, as needed. Nighttime construction activities may be required to shut down the Inland Feeder and install the tie-in connection. As discussed in Section 1.0, *Project Description*, the proposed Project would result in a maximum amount of approximately 44 truck trips per day. Following completion of construction activities, maintenance and operational activities at the Foothill Pump Station facility would not change and would not result in new traffic trips. As such, the proposed Project would not generate more the 110 daily trips during the construction or operational period and would not result in significant VMT impacts. Therefore , the proposed Project would not conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), and impacts would be less than significant.

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. No, the proposed Project would not increase hazards due to a geometric design feature or incompatible uses. The proposed Project would not include reconfiguration of existing roadways, driveways, or intersections. Additionally, the proposed Project would not include the construction of new roadways, driveways, or intersections. The proposed Project and construction staging areas would be located mainly within the existing Foothill Pump Station facility and just outside of the fenced area to the south. The proposed Project would include construction of an intertie connection between the Inland Feeder and Foothill Pump Station through construction of pipelines, vaults, and surge tanks. Proposed Project components outside of the fenced area would be mainly underground. The proposed Project would not result in increased hazards due to geometric design feature or incompatible uses. No impact would occur.

d. Result in inadequate emergency access?

No Impact. No, the proposed Project would not result in inadequate emergency access. Proposed Project access would be provided via Greenspot Road and Cone Camp Road. Proposed Project construction would occur within Metropolitan's fee property and rights-of-way and would not alter public roadways or change the existing access points at the proposed Project Area. Construction vehicles, including oversize vehicles carrying construction equipment and materials would utilize local roadways and freeways to bring equipment and materials to the site. The proposed Project would not require lane or road closures. As outlined in Appendix A, per Metropolitan's Standard Practices, the Contractor shall provide flagmen at intersections to assist trucks entering/exiting the work limits as appropriate. Based on the location of the proposed Project Area within a fenced water treatment facility or Metropolitan patrol road areas that are not accessible to the public, the proposed Project would not impede emergency access to either the proposed Project Area or the public. As such, the proposed Project would not result in inadequate emergency access and no impact would occur.

3.18 Tribal Cultural Resources

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

ANALYSIS OF IMPACTS

a. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

ii) A resource determined by the Lead Agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe?

No Impact. No, the proposed Project would not cause a substantial adverse change in the significance of a tribal cultural resource (TCR). Tribal cultural resources are defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the CRHR. A formal consultation process with California Native American tribes regarding tribal cultural resources must commence prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project.

On December 7, 2023, Metropolitan sent letters via certified mail to four Native American tribes that had previously requested to be informed through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with those tribes under Public Resource Code Section 21080.3.1. Tribes notified include the Yuhaaviatam of San Manuel Nation (formerly San Manuel Band of Mission Indians), Soboba Band of Luiseño Indians, Gabrieleño Band of Mission Indians-Kizh Nation, and San Gabriel Band of Mission Indians.

Yuhaaviatam of San Manuel Nation Tribal Archaeologist, Ms. Kristen Tousto, responded on December 12, 2023, that the proposed Project Area would be located with Yuhaaviatam of San Manuel Nation ancestral territory and requested copies of the proposed Project cultural resources report, geotechnical report, and project plans. Metropolitan Senior Environmental Specialist Michelle Morrison, MA, RPA, replied on December 13, 2023, and provided the proposed Project geotechnical report and the cultural resources report created for the construction of the Inland Feeder, which includes surveys and findings for the entire proposed Project Area. Ms. Tousto of the Yuhaaviatam of San Manuel Nation responded and noted that the Tribe does not have concerns with the proposed Project implementation, but requested the inclusion of three cultural resources mitigation measures, which consisted of the following:

- In the event cultural resources are discovered during Program activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease until the find can be assessed by a qualified archaeologist. Additionally, if discovered, the Tribe shall be notified regarding any pre-contact and/or historic-era cultural resources, so as to be provided the opportunity to provide input for significance and treatment.
- Implementation of a Monitoring and Treatment Plan with archaeological monitoring in the event a significant pre-contact and/or historic-era cultural resource is identified with review by the Tribe.
- Implementation of procedures in the event human remains or funerary objects are encountered pursuant to California Health and Safety Code Section 7050.5.

The Yuhaaviatam of San Manuel nation also requested mitigation measures for TCRs, which consisted of the following:

- Tribal notification and input with regard to significance and treatment if any pre-contact and/ cultural resources are discovered during proposed Project implementation and implementation of a cultural resources Monitoring and Treatment Plan with Native American monitoring in the event a significant resource is identified.
- Submittal of all archaeological/cultural documentation prepared for the proposed Project to Yuhaaviatam of San Manuel Nation and consultation with Yuhaaviatam of San Manuel Nation throughout the life of the proposed Project.

On December 19, 2023, Ms. Morrison contacted Ms. Tousto via telephone to discuss the Tribe's proposed mitigation measures. Ms. Morrison stated that some of the mitigation measures proposed by the Tribe are generally consistent with the standard procedures Metropolitan implements for all projects (Section 01065 of Metropolitan's construction contractor specifications), including procedures to follow in the event archaeological resources are unexpectedly encountered during construction and procedures to follow in the event human remains are unexpectedly encountered, pursuant to California Health and Safety Code Section 7050.5. Ms. Morrison also clarified that a cultural or tribal resource must be identified in the vicinity of the proposed Project Area in order to mitigate for potential impacts to a resource. Ms. Tousto concurred with

the use of Metropolitan's standard procedures pertaining to cultural resources to be incorporated into the proposed Project construction contractor specifications. The telephone conversation was summarized in a December 19, 2023, email to the Tribe.

No additional tribal cultural resource consultation requests were received during the consultation period. Metropolitan's cultural resource and archaeological resource identification efforts did not identify the presence of any prehistoric archaeological resources or resources eligible for or listed on the CRHR or local register within the proposed Project Area. Because no tribal cultural resources have been identified on or near the proposed Project Area, the proposed Project would not cause a substantial adverse change in the significance of a tribal cultural resource as defined, and no impact would occur.

3.19 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 stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction 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?	☐	☐	☒	☐

Significance criteria established by CEQA Guidelines, Appendix G.

ANALYSIS OF IMPACTS

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction of which could cause significant environmental effects?

No Impact. No, the proposed Project would not require or result in the relocation or construction of new or expanded wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities. The proposed Project would include construction of an intertie connection between the Inland Feeder and Foothill Pump Station through construction of pipelines, vaults, and surge tanks. Once construction activities are completed, operations and maintenance would not require any expanded wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities. Therefore, no impacts related to new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities would occur.

b. Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?

No Impact. Yes, the proposed Project would have sufficient water supplies available to serve the proposed Project and reasonably foreseeable future development during normal, dry, and multiple dry years. The proposed Project would include construction of an intertie connection between the Inland Feeder and

Foothill Pump Station through construction of pipelines, vaults, and surge tanks. Temporary water usage would be required during the construction period for dust control and other construction activities. Water usage for proposed Project construction would be temporary and would not require a long-term supply of water over multiple years. Once construction activities are completed, operations would not require additional water. Therefore, there would be no impact.

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?

No Impact. No, the proposed Project would not result in a determination by the wastewater treatment provider which serves or may serve the proposed Project, that it has adequate capacity to serve the proposed Project's projected demand in addition to the provider's existing commitments. The proposed Project would include construction of an intertie connection between the Inland Feeder and Foothill Pump Station through construction of pipelines, vaults, and surge tanks. Wastewater generated during construction of the proposed Project would be minimal, consisting of portable toilet waste generated by construction employees. No new demand on an existing wastewater treatment provider would occur and no impact would occur.

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?

Less-Than-Significant Impact. No, the proposed Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure. The proposed Project would generate solid waste during construction activities, including general construction debris and employee personal waste. The construction contractor would be required to dispose of solid waste in accordance with local solid waste disposal requirements. In compliance with the California Integrated Waste Management Act of 1989 and the California Green Building Code, the proposed Project would be required to divert 50 percent of its construction waste from landfills. The remaining construction solid waste would be taken to a nearby landfill to the proposed Project Area to be determined by the construction contractor. The closest landfill to the proposed Project would be the California Street Landfill, which is located in the city of Redlands approximately 4.5 miles southwest of the proposed Project Area. California Street Landfill has a permitted throughput of 829 tons per day and has a remaining capacity of 5,168,182 cubic yards (CalRecycle 2024). The landfill's cease operation date is anticipated to be in the year 2042. Therefore, the landfill would have sufficient capacity to accommodate the proposed Project's disposal needs. Following construction activities, the operation of the proposed connection pipelines would be similar to existing conditions, and no new sources of operational solid waste generation would occur as a result on the proposed Project. Based on the existing landfill capacity at the California Street Landfill and the temporary nature of solid waste generation associated with the proposed Project, impacts would be less than significant.

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less-Than-Significant Impact. Yes, the proposed Project would comply with federal, state, and local management and regulations to reduce solid waste. Construction activities associated with the proposed Project would generate solid waste, including general construction debris and employee personal waste. Federal solid waste regulations are codified under the Resource Conservation and Recovery Act (RCRA).

These regulations generally provide guidelines and procedures for selecting regions and agencies to handle solid waste management problems under RCRA and delegate solid waste management responsibility down to the state or local level where possible. In California, solid waste management and recycling is overseen by the California Department of Resources Recycling and Recovery (known as CalRecycle), a department within the California Environmental Protection Agency. CalRecycle's Waste Permitting, Compliance, and Mitigation Division is responsible for solid waste, waste tire, recycled content product and local government regulatory mandates and activities. The State of California has delegated solid waste management responsibility to the local level. The City of Highland contracts with Burrtec Waste Industries, Inc. to collect trash and assist the City in meeting mandated diversion goals established by the State of California.

The majority of state and local laws regarding solid waste management and reduction (AB 1826, AB 341, AB 1383, Government Code Title 7.97 68055-68055.9) pertain to state agencies or businesses, and therefore do not apply to Metropolitan as a public agency and water utility. The Project Contractor(s) would be required to comply with federal, state, and local statutes and regulations related to solid waste and would not dispose of solid waste in a manner that differs from any federal, state, or local management plans. Therefore, impacts would be less than significant.

REFERENCES

CalRecycle. 2024. SWIS Facility/Site Activity Details: California Street Landfill. Available at https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1855?siteID=2637. Accessed February 7, 2024.

3.20 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?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

ANALYSIS OF IMPACTS

If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, would the Project:

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

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?

No Impact. No, the proposed Project would not be located in or near a State Responsibility Area or lands classified as a Very High Fire Hazard Severity Zone (CAL FIRE, 2023). Therefore, no impacts related to wildfire in or near State Responsibility Areas or lands classified as VHFHSZ would occur.

REFERENCES

California Department of Forestry and Fire Protection (CAL FIRE), 2023. Fire Hazard Severity Zones in State Responsibility Area. Available online at https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008. Accessed December 11, 2023.

3.21 Mandatory Findings of Significance

Would 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 substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
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 that would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Significance criteria established by CEQA Guidelines, Appendix G.

ANALYSIS OF IMPACTS

a. Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

Less-Than-Significant Impact with Mitigation Incorporated. No, the proposed Project would not substantially degrade or impact biological resources or eliminate important examples of the major period of California history or prehistory. As discussed in Section 3.4, *Biological Resources* and Appendix C, construction of the proposed Project has the potential to affect threatened, endangered, candidate, or special status species. However, implementation of **Mitigation Measures BIO-1 through BIO-11** would ensure that impacts to biological resources are mitigated to a less than significant level. Therefore, impacts are considered less than significant with mitigation.

As discussed in Section 3.5, *Cultural Resources* and Appendix D, the proposed Project would not cause a substantial adverse change in the significance of a historical resource or of an archaeological resource, and no impacts would occur. Operations and maintenance of the proposed Project would be similar to existing conditions, and no long-term permanent impacts to biological or cultural resources would occur.

Mitigation Measures

Implement Mitigation Measures BIO-1 through BIO-11.

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.)

Less-Than-Significant Impact with Mitigation Incorporated. No, the proposed Project would not have impacts that are individually limited, but cumulatively considerable. A cumulative impact could occur if the proposed Project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present, and reasonably foreseeable future projects for each resource area. No direct or indirect significant impacts were identified for the proposed Project that could not be mitigated to a less than significant level. However, when combined with other projects within the vicinity, the proposed Project could result in a contribution to a potentially significant cumulative impact when combined with other projects in the area. The proposed Project would result in no impacts to agriculture and forestry resources, land use and planning, mineral resources, population and housing, public services, recreation, tribal cultural resources, and wildfire. As a result, cumulative impacts related to these resources would not occur.

In addition, impacts would be less than significant, either with or without mitigation, for aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, noise, transportation, and utilities and service systems. The impacts to these environmental resource areas would be localized to the Project Area, would be able to be reduced to a less than significant level with mitigation measures. The proposed Project would occur within the existing Foothill Pump Station facility and immediately south of the facility, which is surrounded by sparse residential properties to the east and west and open space to the south. The proposed Project when considered with other projects would not result in cumulatively considerable impacts with incorporation of mitigation measures.

Operations and maintenance activities associated with the proposed Project would be similar to existing conditions and would not add to cumulative impacts. No cumulative impacts would occur.

Mitigation Measures

Implement Mitigation Measures BIO-1 through BIO-11 and NOI-1.

c. Does the Project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?

Less-Than-Significant Impact with Mitigation Incorporated. No, the proposed Project would not result in environmental effects that could cause substantial adverse effects on human beings, either directly or indirectly. Based on the analysis contained within Section 3.0, *Evaluation of Environmental Effects*, the proposed Project, with implementation of mitigation measures, would not exceed any significance thresholds or result in significant impacts creating direct or indirect impacts to human beings. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures

Implement Mitigation Measure NOI-1.

4.0 List of Preparers

4.1 Metropolitan Water District of Southern California

Michelle Morison, Senior Environmental Specialist

Elizabeth Florence, Associate Environmental Specialist

Alfredo Aguirre, Environmental Specialist

Sean Carlson, Team Manager

4.2 Environmental Science Associates

Tom Barnes, Project Director

Nicolle Steiner, Project Manager

Technical Staff

Claudia Camacho-Trejo: Cultural, Tribal Cultural Resources

Fatima Clark: Paleontological Resources

Sara Dietler: Cultural, Paleontological, and Tribal Cultural Resources

Amanda French: Biological Resources

Gary Gick: 508 Compliance

Aaron Guzman: Publications

Elbert Hsiung: Air Quality, Greenhouse Gas Emissions, Energy, Noise

Brandon Mukogawa: Biological Resources

Justin Nguyen: Environmental Analysis

Johanna Page: Biological Resources

Alan Sako: Air Quality, Greenhouse Gas Emissions, Energy, Noise

Nicole Sanchez-Sullivan: Technical Editing

Chance Scott: GIS

Stephanie Villegas: Environmental Analysis

5.0 Acronyms List

AB	Assembly Bill
AQMP	air quality management plan
BMP	best management practice
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CAP	Climate Action Plan
CARB	California Air Resources Board
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CGS	California Geological Survey
CHRIS	California Historical Resources Information System
CNDDB	California Natural Diversity Database
CO	carbon monoxide
CO2	carbon dioxide
CO2e	carbon dioxide equivalent
CRA	Colorado River Aqueduct
CRHR	California Register of Historical Resources
CWA	Clean Water Act
dB	decibels
dBA	A-weighted decibel
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
DVL	Diamond Valley Lake
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FHWA	Federal Highway Administration
GHG	qualified greenhouse gas
IS	Initial Study
ITP	Incidental Take Permit
LACM	History Museum of Los Angeles County
LST	localized significance threshold
MBTA	Migratory Bird Treaty Act of 1918
MND	Mitigated Negative Declaration
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission

NIOSH	National Institute for Occupational Safety and Health
NOx	nitrogen oxides
NPDES	National Pollution Elimination Discharge System
NRCS	Natural Resource Conservation Service
OPR	Governor's Office of Planning and Research
OS	Open Space
PM10	particulate matter with a diameter of 10 microns or less
PPV	peak particle velocity
PRC	Public Resources Code
RCRA	Resource Conservation and Recovery Act
REL	recommended exposure limit
RMS	root mean square
ROG	reactive organic gas
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SBVMWD	San Bernardino Valley Municipal Water District
SBVWCD	San Bernardino Valley Water Conservation District
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SLF	Sacred Lands File
SWP	State Water Project
SWPPP	stormwater pollution prevention plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCR	tribal cultural resource
TWA	time-weighted average
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VMT	vehicle miles traveled
VOC	volatile organic compound
WBWG	Western Bat Working Group
WDR	waste discharge requirement
WEAP	worker environmental awareness program