Casa Loma Siphon No. 1 and San Jacinto Pipeline Protection Project

Proposed Initial Study-Mitigated Negative Declaration

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

December 2025

TABLE OF CONTENTS

Contents Page

Tables

Figures

Appendices

1. Project Description

1.1 Introduction

The Metropolitan Water District of Southern California (Metropolitan) is a regional wholesaler that provides water for 26 member agencies to deliver either directly or through their sub-agencies to nearly 19 million people across a 5,200-square-mile service area in six counties (Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura) in southern California. 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 owns and operates the Colorado River Aqueduct (CRA), which is a regional water conveyance system that consists of five pumping plants, 450 miles of high voltage power lines, one electric substation, four reservoirs, and 242 miles of siphons, canals, conduits, and tunnels starting at the Colorado River and terminating at Lake Mathews in Riverside County, California.

1.2 Project Background

North of Soboba Road in the San Jacinto area, the CRA San Jacinto Tunnel ends at the West Portal, which is the site of the CRA Diversion Structure. The diversion structure is where the CRA branches into three different pipelines (CRA Casa Loma Siphon No. 1, CRA Casa Loma Siphon No. 2, and the San Jacinto Pipeline), as shown in Figure 1-2 in Section 1.3, *Project Location and Land Use*. Approximately 1,000 feet west of the diversion structure, the three pipelines cross underneath the San Jacinto River. Within the San Jacinto River channel, there is currently inadequate cover material (approximately one foot in depth) over the CRA Casa Loma Siphon No. 1 and San Jacinto Pipeline.[1] The inadequate cover material results in potential for flotation of pipelines when the ground becomes saturated during and after storm events and the pipelines are less than 20 percent full. Typically, pipelines constructed in saturated areas rely on cover material or additional restraint, such as concrete encasement, for protection from flotation. Flotation of pipelines has the potential to result in structural damage to the pipelines and interruption of water delivery. Inadequate cover material above the pipelines also presents risk due to erosion, which could result in structural damage. Maintaining cover material above the pipelines also provides protection from debris impacts and loading from vehicles operating above the pipelines (Metropolitan 2023).

In 2019, heavy precipitation and increased San Jacinto River flows resulted in exposure of the buried Casa Loma Siphon No. 1 and San Jacinto Pipeline conduits where they cross underneath the San Jacinto River. Emergency work was undertaken by Metropolitan to reinstall soil cover and protect the CRA Casa Loma Siphon No. 1 and San Jacinto Pipeline within the San Jacinto River. In 2019, Metropolitan installed a series of concrete k-rail and steel trench plates over the pipes to prevent exposure. The k-rail and steel trench plates were displaced over time due to scour and river flows and were ultimately removed in July 2023. In August 2023, buried riprap and k-rails were placed within the river as temporary grade control to prevent further pipe/siphon exposure until a permanent solution could be developed. The proposed Casa Loma Siphon No. 1 and San Jacinto Pipeline Protection Project (proposed Project) is the permanent solution to protect the pipelines at this location.

[1] The cover material above the CRA Casa Loma Siphon No. 2 has been determined to be adequate (more than four feet) within the San Jacinto River channel.

1.3 Project Location and Land Use

The proposed Project site encompasses an approximately 6.7-acre area located within and adjacent to the San Jacinto River, between Soboba Road and State Street, near the city of San Jacinto in unincorporated Riverside County, California. The Project site is depicted on the United States Geological Survey *San Jacinto, California,* 7.5-minute topographic map within Township 4 South, Range 1 West, Section 15, San Bernardino Baseline and Meridian. The proposed Project site includes portions of Assessor's Parcel Numbers (APN) 430-220-003, 430-220-008, 430-220-010, and 430-220-011, all of which have a Riverside County General Plan land use designation of Open Space-Recreation/Open Space-Water and are zoned as W-2-10 (County of Riverside 2025a). Land uses surrounding the Project site include open space to the north, a commercial recreation park (e.g., paintball, paragliding, biking, hiking, camping) to the east, open space (City of San Jacinto's planned San Jacinto River Park) to the south, and open space and agricultural land to the west. The San Jacinto River transects the southern end of the proposed Project site from northwest to southeast. The nearest residences as well as Temple Beth Am, a synagogue, are located approximately 0.2 mile to the west.

Figure 1-1 shows the regional location of the proposed Project site. Figure 1-2 shows the proposed Project site and surrounding vicinity in a local context. Figure 1-3 provides representative photos of existing conditions at the proposed Project site.

Figure 1-1. Regional Project Site Vicinity

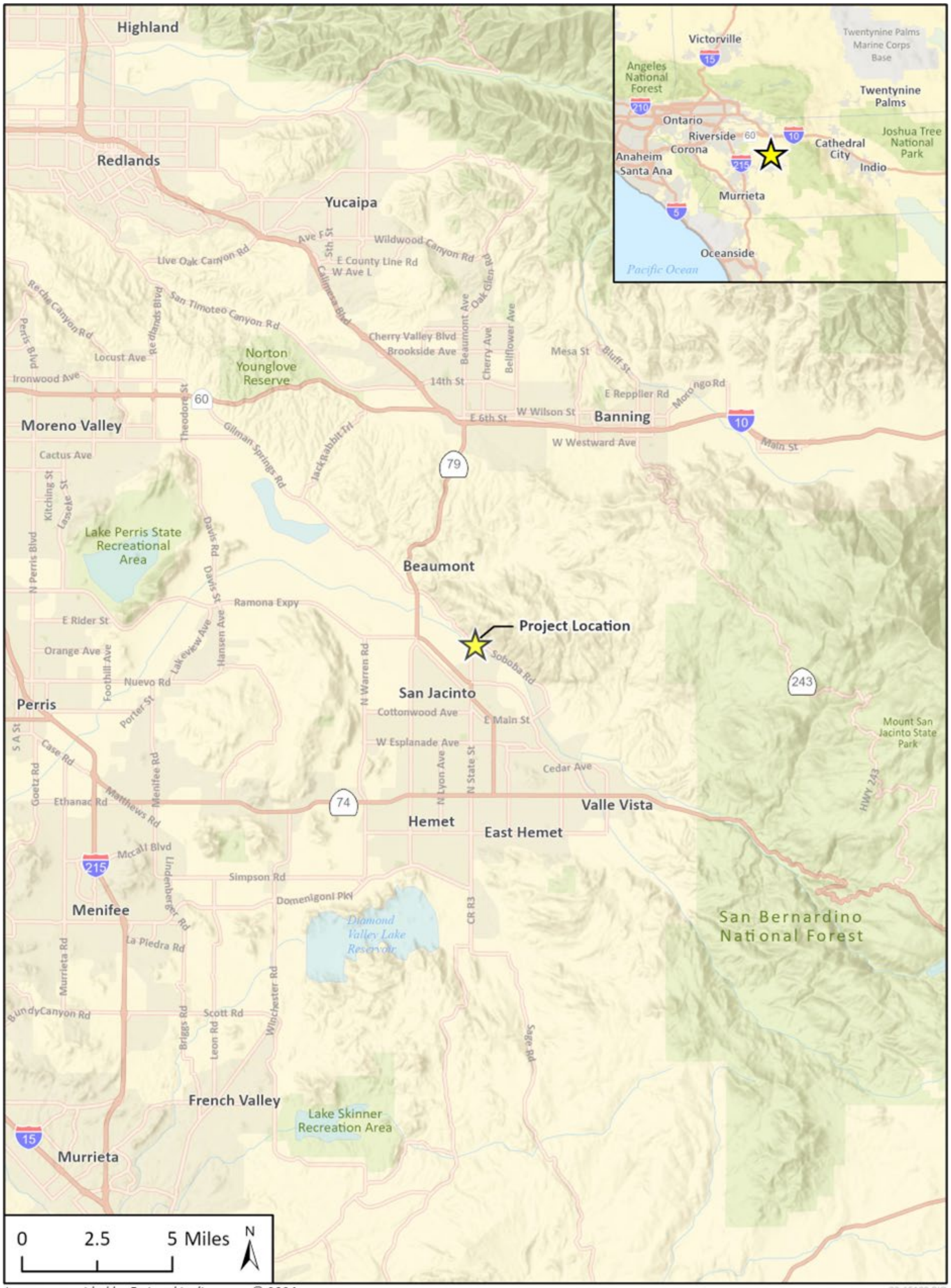

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Figure 1-2. Project Site Location

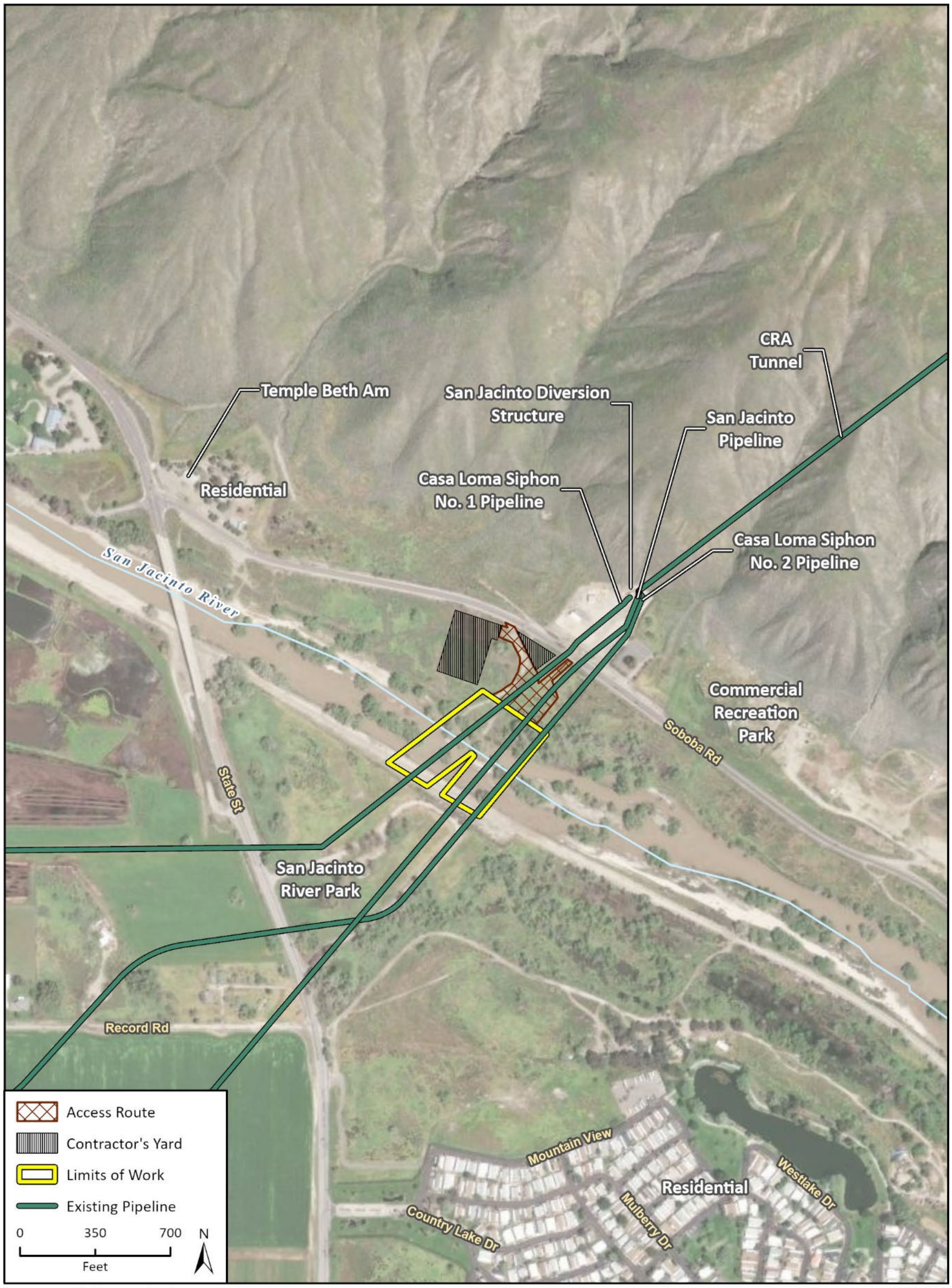

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Fig 1-2 Project Site Location

Figure 1-3. Representative Photographs of Existing Project Site Conditions

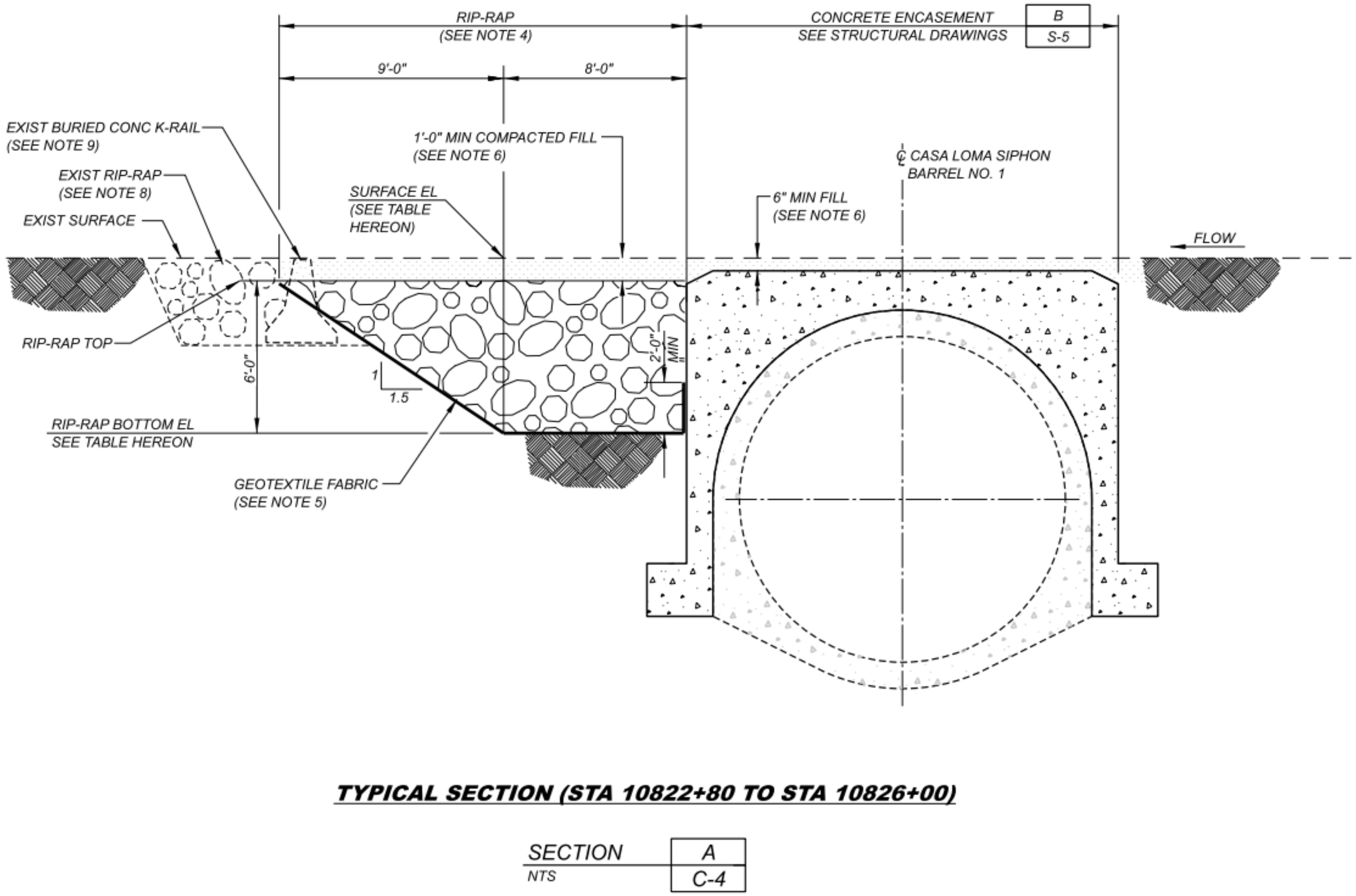
Photo 1. View of the Project site, including the San Jacinto River bed, facing northwest.

Photo 2. View of existing access road leading into the San Jacinto River, facing southwest.

Photo 3. View of the existing access road facing northeast.

Photo 4. View of the location of the proposed access road entrance into the San Jacinto River at the southern border of the Project site, facing northeast.

Figure 1-4. Representative Cross-Section of Concrete Encasement



1.4 Project Objectives

The proposed Project objectives include the following:

- To protect Metropolitan's critical infrastructure and prevent structural damage;
- To enhance pipeline resilience against environmental factors such as erosion, flooding, and seismic activity;
- To ensure long-term operational reliability of the CRA system by safeguarding essential water conveyance components; and
- To minimize service disruptions by maintaining continuous support of the pipelines during phased construction.

1.5 Project Characteristics

The proposed Project includes the encasement of approximately 320 feet of the CRA Casa Loma Siphon No. 1 and approximately 295 feet of the San Jacinto Pipeline. The encasement would consist of concrete poured around the existing pipelines with a width of 16 feet and a depth of 13 feet for CRA Casa Loma Siphon No. 1 and a width of 12.5 feet and a depth of 10.7 feet for the San Jacinto Pipeline. Both encasements would be reinforced with steel rebar placed both horizontally and vertically to ensure structural integrity. The proposed concrete encasements would be placed on a compacted base and surrounded by riprap for erosion protection. Underneath the riprap, a non-woven geotextile fabric would be installed to prevent soil migration while maintaining drainage. Construction of the concrete encasement would require excavation above and adjacent to both sides of each pipeline to allow for placement of the concrete forms and steel reinforcement. The top of the fill would be graded to match the existing surface elevation. Figure 1-4 presents a cross-section of the proposed encasement activities.

Existing conduit protection structures that were previously installed in 2023 for emergency temporary protection (e.g., concrete k-rails, riprap) would be either removed or relocated within the Project site. K-rails would be removed and re-located to a portion of the Project site outside the streambed, and portions of riprap interfering with the proposed protection structure would be removed and salvaged, as feasible. The proposed Project would not result in the addition of new aboveground components or appurtenances.

1.6 Construction Characteristics

1.6.1 Construction Schedule

Construction of the proposed Project would occur over an approximately eight-month period, anticipated to begin as early as the fall of 2026.[2] Vegetation removal would occur in the fall of 2026 to avoid the nesting bird season and is anticipated to require approximately two weeks to complete. Installation of the proposed protection structures is anticipated to begin during the dry season in May 2027 and require approximately 7.5 to 9.5 months to complete, depending on construction phasing.[3]

[2] The actual start date of construction would be contingent upon the receipt of all required permits and approvals for the proposed Project.

[3] If work on both pipelines occurs concurrently, approximately 7.5 months would be required to complete the proposed Project. However, if work on each pipeline occurs separately, approximately 9.5 months would be required to complete the proposed Project.

Construction would occur Monday through Friday from 7:00 a.m. to 4:00 p.m. No nighttime construction would occur. Construction during early morning and late afternoon hours in the fall, winter, and early spring may require limited construction lighting. Construction phases would include site preparation, excavation, structural reinforcement installation, and site restoration.

1.6.2 Off-road Construction Equipment

The estimated type and number of off-road construction equipment to be used during construction of the proposed Project is listed in Table 1-1.

Table 1-1. Anticipated Construction Equipment Quantities

Equipment	Site Preparation	Excavation	Structural Reinforcement Installation, Backfill, and Riprap Installation	Site Restoration
Backhoes	1	1	1	1
Bore/Drill Rigs	--	2	--	--
Compactors	--	--	2	2
Compressors	--	--	2	--
Dozers	1	1	--	1
Dumpers/Tenders	--	5	--	1
Excavators	1	2	2	1
Front End Loaders	1	2	--	1
Generators	3	3	3	3
Graders	--	--	--	1
Rough Terrain Forklifts	1	1	1	1
Skid Steer Loaders	1	1	1	1

1.6.3 Ground Disturbance and Materials Delivery

Ground disturbance associated with the construction of the proposed Project would occur over an area of approximately 5.5 acres. The maximum depth of ground disturbance would be approximately 15 feet. Ground disturbance would involve approximately 3,900 cubic yards of soil cut, approximately 600 cubic yards of soil fill, and the export of approximately 3,300 cubic yards of soil material from the Project site. Construction activities would involve the transport and delivery of approximately 1,600 cubic yards of ready-mix concrete, approximately 1,600 cubic yards of riprap, and reinforcing steel.

1.6.4 Groundwater Dewatering and Temporary Surface Water Diversion

Groundwater dewatering during Project ground-disturbing activities may be necessary depending on depth to groundwater, although previous excavations at the Project site did not encounter groundwater. If groundwater is encountered during construction activities, groundwater would be pumped out of the excavation area and discharged to the San Jacinto River riverbed pursuant to an applicable National Pollutant Discharge Elimination System (NPDES) permit for discharges of groundwater, which Metropolitan would require its construction contractor to obtain. Groundwater is not expected to require treatment prior to discharge.

During construction, a temporary diversion system consisting of earthen or water-filled berms, a series of pipelines, and appurtenant components would be installed within the bed and banks of the San Jacinto River to allow for diversion of surface water flows should a precipitation event occur. If a precipitation event is forecasted that would cause flows to exceed the capacity of the diversion system, protective measures for the construction work, equipment, and Metropolitan's pipelines would be implemented. This system would be removed following the completion of construction, and the natural topography of the streambed would be restored to pre-project conditions.

1.6.5 Construction Access, Staging, and Worker Parking

Construction workers and vehicles would access the Project site regionally from State Route 79, then travel north on State Street and east on Soboba Road. An existing access road, as well as a potential new, unpaved access road, would provide direct access within the Project site from Soboba Road to the proposed disturbance areas. Contractor's yards for construction staging would be located south of Soboba Road, directly to the west and east of the existing access road within the Project site (see Figure 1-2). Construction workers would park at the Project site, either along the existing/proposed access roads or in the contractor's yards.

1.6.6 Tree Removal

The proposed Project would require the trimming or removal of some trees within the limits of work (see Figure 1-2) but not within the access routes or contractor's yards.

1.6.7 Environmental Requirements for Construction

Metropolitan has established standardized environmental protocols and requirements for contractors and Metropolitan staff engaging in construction activities, which are outlined primarily in Section 01065 (Environmental Compliance Requirements) of Metropolitan's standard construction contractor specifications (Appendix A) as well as Sections 01063 (Air Quality, Hazardous Materials, and Wastewater Environmental Requirements), 01070 (Storm Water Pollution Prevention Plan), 01550 (Access, Parking, and Traffic), 01565 (Noise Control), and 02110 (Clearing, Grubbing, and Stripping). These requirements are intended to ensure best practices are in place during all construction phases and to reduce and/or avoid environmental impacts.

Relevant construction requirements are summarized below and are referenced throughout Section 3, *Evaluation of Environmental Impacts*, where applicable:

- Obtain and comply with the applicable local, state, and federal environmental permits.
- Comply with the Federal Migratory Bird Treaty Act and California Fish and Game Code Sections 3503, 3503.5, and 3513 including conducting pre-construction nesting bird surveys and implementation of impact avoidance measures, where applicable.
- Prepare, submit, and comply with the surface and storm water control measures in compliance with the Water Pollution Control Program or Stormwater Pollution Prevention Plan (SWPPP) for individual projects greater than one acre.
- Prepare and comply with a Traffic Control Plan, including the use of appropriate advance warning signage to alert motorists to the potential for cross construction vehicle traffic from the work limits in accordance with California Department of Transportation standards.

- Perform all work without undue noise and make every effort to abate or prevent noise nuisances.
- Maintain all construction vehicle equipment in proper working order for the duration of the construction activities.
- Equip all construction equipment, fixed and mobile, including internal combustion engines, with properly operating and maintained noise mufflers and intake silencers, consistent with the manufacturers' standards.
- Cover or locate all stationary noise-generating equipment, such as generators and compressors, as far as practicable from the nearest residential/institutional property lines to attenuate noise.
- Comply with the applicable local tree protection ordinance.
- Protect any sensitive cultural and paleontological resources by halting work within 50 feet of an unanticipated discovery for evaluation of the find by a qualified professional, require archaeological and/or paleontological monitoring for sites with high sensitivity, and comply with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 in the event that human remains are discovered.
- Direct floodlights to shine downward, and shield floodlights to avoid a nuisance to surrounding areas.
- Equip gasoline-powered or diesel-powered machinery used during construction with standard exhaust controls and muffling devices that also act as spark arrestors.
- Store hazardous materials, including hazardous wastes, in covered, compatible, leak-proof containers when not in use, away from ignition/fire hazards, storm drains, and heavy traffic areas, and protected from rainfall infiltration.
- Store hazardous materials separately from non-hazardous materials and in an area secure from unauthorized entry at all times. Store incompatible hazardous materials and hazardous wastes separately from each other.

1.7 Operational Characteristics

The proposed Project would not result in changes to Metropolitan's existing operation and maintenance conditions at the Project site.

1.8 Potential Permits and Discretionary Approvals

Table 1-2 lists the anticipated permits and discretionary approvals that may be required for Project-related activities. One of the purposes of this Draft IS-MND is to provide these agencies with information to support the agency permitting process. Table 1-2 also lists the types of activities that would be subject to these requirements.

Table 1-2. Permits and Approvals Which May Be Required[1]

Agency/Department	Permit/Approval	Description
United States Army Corps of Engineers	Pre-Construction Notification for Use of Clean Water Action Section 404 Nationwide Permit 3 (Maintenance)	This permit may be required to authorize impacts (e.g., discharge of dredge or fill) to non-wetland waters of the United States.
United States Fish and Wildlife Service	Incidental Take Authorization for Least Bell's Vireo[2]	This approval may be required to authorize incidental take of listed species, if a Clean Water Act Section 404 permit is required and Metropolitan chooses to obtain coverage via the Endangered Species Act Section 7 consultation process.
California Department of Fish and Wildlife	Streambed Alteration Agreement	An Agreement may be required by the California Department of Fish and Wildlife to authorize impacts to streambed with measures to protect fish and wildlife resources
	Incidental Take Permit[2]	This permit may be required to authorize incidental take of listed species, if Metropolitan chooses to obtain coverage under California Fish and Game Code Section 2081 or 2080.1.
Santa Ana Regional Water Quality Control Board	Clean Water Act Section 401 Water Quality Certification	This permit is issued to applicants for a federal permit for activities that may result in a discharge into waters of the United States
	Porter-Cologne Water Quality Control Act Waste Discharge Requirement	This permit may be required to authorize impacts (e.g., discharge of waste) into non-wetland waters of the State, if non-wetland waters of the United States are not impacted.
	National Pollutant Discharge Elimination System Permit	This permit may be required to authorize the discharge of groundwater to the San Jacinto River if dewatering is required during construction.
Western Riverside County Regional Conservation Authority	Participating Special Entity Approval[2]	This approval may be required if Metropolitan chooses to seek coverage for incidental take of listed species through the Participating Special Entity process established under the Western Riverside County Multiple Species Habitat Conservation Plan.

[1] California Government Code Section 53091 exempts Metropolitan, as a regional public water purveyor and utility, from local zoning ordinances and local building codes. At Metropolitan facilities, this exemption has been interpreted to pertain only to activities directly related to the storage, conveyance, and transmission of drinking water.

[2] Metropolitan's decision on whether to obtain coverage for incidental take of least Bell's vireo via the Western Riverside County Multiple Species Habitat Conservation Plan Participating Special Entity process or via an incidental take authorization from the United States Fish and Wildlife Service and Incidental Take Permit from California Department of Fish and Wildlife is pending. As such, all potential responsible agencies have conservatively been listed in this table.

2. Initial Study

This document is a proposed Initial Study and Mitigated Negative Declaration (IS-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), Public Resources Code Section 21000 et seq., and the CEQA Guidelines, California Code of Regulations Section 15000 et seq.

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:

   1. 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
   2. 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 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 discuss the possible environmental effects of the proposed Project for specific environmental factors as identified on the CEQA Environmental Checklist Form in Appendix G of the CEQA Guidelines (as updated in December 2018). For each environmental factor, potential effects are analyzed.

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 and Environmental Checklist Form

a)	Project Title:	Casa Loma Siphon No. 1 and San Jacinto Pipeline Protection Project (proposed Project)
b)	Lead Agency Name and Address:	The Metropolitan Water District of Southern California 700 North Alameda Street Los Angeles, CA 90012
c)	Contact Person and Phone Number:	Alfredo Aguirre Environmental Planning Section The Metropolitan Water District of Southern California Phone: (213) 217-6730 Email: AAguirre@mwdh2o.com
d)	Project Location:	The Project site encompasses an approximately 6.7-acre area located within and adjacent to the San Jacinto River, between Soboba Road and State Street, near the city of San Jacinto in unincorporated Riverside County, California. The Project site is owned by Metropolitan and contains the CRA Casa Loma Siphon No. 1, CRA Casa Loma Siphon No. 2, and the San Jacinto Pipeline. Figures 1-1 and 1-2 in Section 1.3, *Project Location and Land Use*, show the proposed Project site in a regional context and a local context, respectively.

e)	Project Sponsor's Name and Address:	The Metropolitan Water District of Southern California 700 North Alameda Street Los Angeles, CA 90012
f)	General Plan Designation:	Open Space-Recreation (OS-R), Open Space-Water (OS-W)
g)	Zoning:	Controlled Development Area (W-2-10)
h)	Description of Project:	The proposed Project would provide protection for critical water infrastructure. Refer to Section 1, *Project Description*.
i)	Surrounding Land Uses and Setting:	The Project site is surrounded by open space to the north, a commercial recreation park (e.g., paintball, paragliding, biking, hiking, camping) to the east, open space (City of San Jacinto's planned San Jacinto River Park) to the south, and open space and agricultural land to the west.
j)	Other Agencies Whose Approval May be Required:	• United States Army Corps of Engineers • United States Fish and Wildlife Service • California Department of Fish and Wildlife • Santa Ana Regional Water Quality Control Board • Western Riverside County Regional Conservation Authority
k)	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, has consultation begun?	Yes, Metropolitan has conducted consultation pursuant to Public Resources Code (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 the proposed Project, requiring implementation of mitigation as indicated by the checklist on the following pages that is "Less Than Significant With Mitigation Incorporated."

☐ Aesthetics	☐ Agriculture & 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

2.5 Determination

On the basis of this initial evaluation:

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

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

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

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

☐ I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR 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	12-15-2025
Jennifer Harriger Manager, Environmental Planning Section	Date

3. Evaluation of Environmental Impacts

The following discussion addresses impacts to various environmental resources pursuant to the Environmental Checklist Form contained in Appendix G of the CEQA Guidelines.

3.1 Aesthetics

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.

Discussion. Would the Project:

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. According to the Riverside County General Plan, Riverside County's natural visual resources include low-lying valleys, ridgelines, mountain ranges, rock formations, rivers, and lakes (County of Riverside 2021b). At the Project site, scenic vistas primarily consist of views of the nearby mountains and the San Jacinto River, which are visible from surrounding roadways such as Soboba Road, State Street, Goodwin Lane, and Trejo Drive. The proposed Project would temporarily degrade views of the nearby mountains and the San Jacinto River from surrounding roadways during the construction period due to the presence of construction vehicles and equipment. However, following the construction period, the Project site would appear visually similar to existing conditions, such that the proposed Project would not result in a permanent impacts to scenic vistas. Thus, the proposed Project would not result in substantial adverse effects on a scenic vista, and 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. The nearest designated State scenic highway is a portion of State Route (SR) 243, located approximately eight miles east of the Project site (California Department of Transportation 2018). The Project site is not visible from SR 243 due to the intervening distance and topography; accordingly, the proposed Project would not damage scenic resources within view of a State scenic highway. Therefore, no impact to scenic resources within a State scenic highway 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?

Less than Significant Impact. No, the proposed Project, which is in a non-urbanized area, would not substantially degrade the existing visual character or quality of public views of the Project site and its surroundings. Public views of the Project site are visible from surrounding roadways, including Soboba Road, State Street, Goodwin Lane, and Trejo Drive. Motorists along those roadways currently experience views of the San Jacinto River within the Project site and mountains to the north of the Project site. The proposed Project would temporarily degrade views during the construction period due to the presence of construction vehicles and equipment. Following completion of construction, the Project site would appear visually similar to existing conditions because no new aboveground components would be added to the Project site and vegetation would be allowed to restore naturally over time. Therefore, the proposed Project would not substantially degrade the existing visual character or quality of public views of the Project site and its surroundings, and impacts would be less than significant.

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 that would adversely affect day or nighttime views in the area. Project construction activities during early morning and late afternoon hours in the fall, winter, and early spring may require limited construction lighting. In accordance with Metropolitan standard practice outlined in Section 01065 of the construction contractor specifications (see Section 1.6.7, *Environmental Requirements for Construction*), the Project Contractor(s) would be required to exercise special care to direct floodlights to shine downward and to shield them to avoid a nuisance to the surrounding areas, with no lighting including a residence in its direct beam. The proposed Project would not include new permanent lighting sources after the completion of construction, and the proposed Project does not include components with the potential to generate glare. Therefore, impacts would be less than significant.

3.2 Agricultural Resources

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.

Discussion. Would the Project:

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; conflict with existing zoning for agricultural use, or a Williamson Act contract; conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned as Timberland Production; result in the loss of forest land or conversion of forest land to non-forest use; or involve other changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

The Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (California Department of Conservation [DOC] 2022). The Project site is not zoned for agricultural use or under a Williamson Act contract, and no farmland exists within or adjacent to the Project site (County of Riverside 2025a). The Project site is also not zoned for forest land or timberland, and no forest land exists within or adjacent to the Project site (County of Riverside 2021a). Thus, no impacts to agriculture and forestry would occur as a result of the proposed Project.

3.3 Air Quality

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.

OVERVIEW OF AIR POLLUTION, AIR QUALITY STANDARDS, ATTAINMENT STATUS, AND AIR QUALITY MANAGEMENT

This section provides an analysis of proposed Project impacts on air quality and is based in part on air pollutant and greenhouse gas (GHG) emissions modeling conducted by Rincon Consultants, Inc. (Rincon), the results of which are included in Appendix B.

The Project site is located in the South Coast Air Basin (SCAB) within the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD). 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, volatile organic compounds (VOC)/reactive organic gases (ROG),[4] nitrogen oxides, 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 indirectly through chemical reactions in the atmosphere, such as ozone, which is created by atmospheric chemical and photochemical reactions primarily between VOC and nitrogen oxides. 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 Riverside County portion of the SCAB for each pollutant regulated by the NAAQS and CAAQS is summarized in Table 3.3-1.

[4] 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 IS-MND.

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 avg)	0.09 ppm (1-hr avg) 0.070 ppm (8-hr avg)	N (federal and state)
Carbon Monoxide	35.0 ppm (1-hr avg) 9.0 ppm (8-hr avg)	20.0 ppm (1-hr avg) 9.0 ppm (8-hr avg)	U (federal) A (state)
Nitrogen Dioxide	0.100 ppm (1-hr avg) 0.053 ppm (annual avg)	0.18 ppm (1-hr avg) 0.030 ppm (annual avg)	U (federal) A (state)
Sulfur Dioxide	0.075 ppm (1-hr avg) 0.5 ppm (3-hr avg) 0.14 ppm (24-hr avg) 0.030 ppm (annual avg)	0.25 ppm (1-hr avg) 0.04 ppm (24-hr avg)	U (federal) A (state)
Lead	0.15 $\mu g/m^3$ (rolling 3-month avg) 1.5 $\mu g/m^3$ (calendar quarter)	1.5 $\mu g/m^3$ (30-day avg)	U (federal) A (state)
Particulate Matter (PM_{10})	150 $\mu g/m^3$ (24-hr avg)	50 $\mu g/m^3$ (24-hr avg) 20 $\mu g/m^3$ (annual avg)	N (federal and state)
Particulate Matter ($PM_{2.5}$)	35 $\mu g/m^3$ (24-hr avg) 9 $\mu g/m^3$ (annual avg)	12 $\mu g/m^3$ (annual avg)	N (federal and state)
Visibility-Reducing Particles	No Federal Standards	Extinction coefficient of 0.23 per kilometer – visibility of 10 miles or more (0.07 - 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape (8-hr avg)	U (state)
Sulfates	No Federal Standards	25 $\mu g/m^3$ (24-hr avg)	A (state)
Hydrogen Sulfide	No Federal Standards	0.03 ppm (1-hr avg)	U (state)
Vinyl Chloride	No Federal Standards	0.01 ppm (24-hr avg)	U (state)

Notes: NAAQS = National Ambient Air Quality Standard, CAAQS = California Ambient Air Quality Standard, SCAB = South Coast Air Basin, ppm = parts per million, hr = hour, avg = average, $\mu g/m^3$ = micrograms per cubic meter, N = nonattainment, A = attainment, U = unclassified.

Source: CARB 2024 and 2025; USEPA 2024 and 2025a

The SCAQMD (in conjunction with the Southern California Association of Governments [SCAG]) has developed an air quality management plan (AQMP) to meet the requirements of the federal Clean Air Act. The latest iteration of this plan is the SCAQMD (2022) *Final 2022 Air Quality Management Plan*. This plan addresses various federal non-attainment and attainment/maintenance planning requirements, is incorporated into the State Implementation Plan by CARB, and is approved or disapproved by USEPA.

AIR POLLUTANT EMISSION THRESHOLDS

The SCAQMD has recommended quantitative regional significance thresholds for temporary Project construction activities and long-term Project operation within its jurisdictional boundaries, as shown in Table 3.3-2. In addition to the regional significance thresholds, the SCAQMD has established Localized Significance Thresholds to evaluate localized air pollutant emissions based on ambient pollutant concentrations, proximity to sensitive receptors, and project size. However, the Project site is located approximately 0.2 mile (1,075 feet) from the nearest sensitive receptors, and emissions generated at the Project site would dissipate rapidly with distance. Therefore, localized air pollutant impacts are discussed qualitatively, and the Localized Significance Thresholds are not utilized.

Table 3.3-2. SCAQMD Regional Significance 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: SCAQMD = South Coast Air Quality Management District, VOC = volatile organic compounds, NO_X = nitrogen oxides, CO = carbon monoxide, SO_X = sulfur oxides, PM_{10} = particulate matter 10 micrometers or less in diameter, $PM_{2.5}$ = particulate matter 2.5 micrometers or less in diameter.

Source: SCAQMD 2023

METHODOLOGY

Air pollutant emissions associated with proposed construction activities were estimated using the California Emissions Estimator Model (CalEEMod) version 2022.1.1. Air pollutant emissions associated with operation and maintenance activities were not modeled because the proposed Project would not result in changes to Metropolitan's existing operation and maintenance activities at the Project site. CalEEMod uses Project-specific information, including the proposed Project's land uses and location, to estimate a Project's emissions. Air pollutant and GHG emissions modeling is attached as Appendix B.

Proposed construction activities were modeled to begin in October 2026 with vegetation removal, followed by installation of the proposed protection structures beginning in May 2027. Although construction could begin at a later date depending on when Project permits are acquired, activities occurring in future years would be expected to generate fewer emissions due to increasingly stringent fuel efficiency standards, such as future iterations of the federal construction equipment emissions standards, Corporate Average Fuel Economy standards, and cleaner mobile equipment engine models that would phase in over time.

If construction on both pipelines occurs concurrently with two active work areas, approximately 7.5 months of work would be required to complete the proposed Project. However, if work on each pipeline occurs separately with only one active work area, approximately 9.5 months would be required to complete the proposed Project. For the purposes of estimating maximum daily air pollutant emissions, the 7.5-month construction scenario was modeled in CalEEMod. This approach is considered conservative because the shorter construction duration with two active work areas would result in higher construction intensity and associated construction-related emissions.

Emissions modeled for the proposed construction activities include emissions generated by heavy equipment used on site and emissions generated by vehicle trips, such as worker, water truck, and dump truck trips. The construction schedule, list of heavy equipment, and grading quantities used in CalEEMod were based on information summarized previously in Section 1, *Project Description*. As stated therein, it was assumed ground disturbance would involve the export of approximately 3,300 cubic yards of soil material from the Project site and the transport and delivery of approximately 1,600 cubic yards of ready-mix concrete, approximately 1,600 cubic yards of riprap, and reinforcing steel.

<u>Discussion</u>. *Would the Project:*

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

No Impact. No, the proposed Project would not conflict with or obstruct implementation of the applicable air quality plan. Pursuant to SCAQMD guidance, the consistency of the proposed Project with the SCAQMD 2022 AQMP is evaluated based on the two criteria established by the SCAQMD CEQA Air Quality Handbook (SCAQMD 1993):

1. Whether the proposed Project would result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP
2. Whether the proposed Project would exceed the growth assumptions in the AQMP

Violations of federal and state air quality standards would occur if the proposed Project would generate emissions in excess of SCAQMD regional thresholds set forth in Table 3.3-2. As shown in Table 3.3-3 under Threshold 3.3(b), construction activities would not generate emissions in excess of SCAQMD regional thresholds. After Project construction is complete, there would be no changes to Metropolitan's existing operation and maintenance activities at the Project site. Therefore, the proposed Project would not result in an increase in frequency or severity of existing air quality violations, cause or contribute to a new violation, or delay timely attainment of the air quality standards in the AQMP, pursuant to criterion no. 1.

The proposed Project does not include new housing or businesses that would induce population or employment growth within SCAQMD's jurisdiction. No new facilities or structures are proposed, and the proposed Project would not increase water supply to the area or otherwise directly or indirectly induce population growth. The proposed Project also would not require zone changes, conditional uses, or entitlements that would modify the existing zoning or land use designations of the Project site, which was used, in part, to develop 2022 AQMP growth assumptions and emission inventories. Therefore, the proposed Project would not generate new growth that would conflict with or obstruct implementation of the 2022 AQMP pursuant to criterion no. 2.

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. The proposed Project would not 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.

Construction Activities

Proposed construction activities would involve vegetation removal, site preparation, excavation, structural reinforcement installation, backfill, riprap installation, and site restoration. Air pollutant emissions would be generated by heavy equipment used on site and by vehicle trips, such as worker, water truck, and dump truck trips. The nature and magnitude of construction emissions would vary from day to day, depending primarily on the level of activity and the construction equipment in use.

Table 3.3-3 summarizes maximum daily air pollutant emissions generated during Project construction. As shown therein, maximum daily emissions generated by construction activities would not exceed SCAQMD regional air emission thresholds. Therefore, Project construction would not result in a cumulatively considerable net increase of any criteria pollutant, and impacts would be less than significant.

Table 3.3-3. Representative Maximum Daily Emissions for Proposed Construction Activities (lbs/day)

	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	3	23	29	<1	4	2
SCAQMD Significance Thresholds	75	100	550	150	150	55
Significant (Exceeds Thresholds)?	No	No	No	No	No	No

Notes: VOC = volatile organic compounds, NO_X = nitrogen oxides, CO = carbon monoxide, SO_X = sulfur oxides, PM_{10} = particulate matter 10 micrometers or less in diameter, $PM_{2.5}$ = particulate matter 2.5 micrometers or less in diameter, SCAQMD = South Coast Air Quality Management District.

Source: Appendix B; SCAQMD 2023

Operation and Maintenance Activities

After Project construction is complete, there would be no changes to Metropolitan's existing operation and maintenance activities at the Project site. Therefore, Project operation and maintenance would not result in a cumulatively considerable net increase of any criteria pollutant, and no impact would occur.

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 include schools, playgrounds, childcare centers, long-term health care facilities, rehabilitation centers, convalescent homes, hospitals, retirement homes, and residences. The Project site is located more than 1,000 feet from the nearest sensitive receptors, which are residences located approximately 0.2 mile (1,075 feet) to the west.

Fugitive Dust Emissions

Project construction activities would result in temporary generation of fugitive dust emissions, primarily from site preparation and excavation activities, transport of soil, and movement of heavy-duty construction equipment on unpaved surfaces. The Project Contractor(s) would be required to comply with SCAQMD Rule 403. Rule 403 is intended to reduce the amount of particulate matter in the air due to fugitive dust sources by requiring actions to minimize the creation of fugitive dust. Rule 403 includes the following measures and is applicable as necessary to the proposed Project:

- Nontoxic chemical soil stabilizers shall be applied according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Active sites shall be watered at least twice daily. Locations where grading is to occur shall be thoroughly watered prior to earthmoving.
- All trucks hauling dirt, sand, soil, or other loose materials shall be covered or have at least 0.6 meter (two feet) of freeboard (vertical space between the top of the load and top of the trailer) maintained in accordance with the requirements of California Vehicle Code Section 23114.

Adherence to the dust suppression requirements included in Rule 403, which are incorporated by reference in Section 01065 of Metropolitan's construction contractor specifications, would minimize the creation of fugitive dust and the associated potential to expose sensitive receptors to localized fugitive dust emissions. Therefore, Project construction would not expose sensitive receptors to substantial concentrations of fugitive dust emissions, and impacts would be less than significant.

Toxic Air Contaminants

Toxic air contaminants (TACs) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness, or that may pose a present or potential hazard to human health. TACs generally consist of four types: organic chemicals such as benzene, dioxins, toluene, and perchloroethylene; inorganic chemicals such as chlorine and arsenic; fibers such as asbestos; and metals such as mercury, cadmium, chromium, and nickel. The primary TAC emitted by proposed Project activities would be diesel particulate matter (DPM) generated by heavy equipment and diesel-fueled delivery and dump trucks used during construction activities at the Project site.

The amount of TACs to which receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer. The California Office of Environmental Health Hazard Assessment has not identified short-term health effects from DPM.

Construction activities would be temporary and short-term (between approximately 7.5 to 9.5 months) and would not generate emissions in a fixed location for extended periods of time. The nearest sensitive receptors to the Project site are located approximately 0.2 mile (1,075 feet) to the west, and exhaust from mobile equipment dissipates rapidly with distance. Furthermore, the duration of exposure would be short in comparison to the exposure period typically used to evaluate health risk. Current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not correlate well with the temporary nature of construction activities. DPM emissions from an approximately 9.5-month period of construction activities would represent 2.6 percent of the typical 30-year exposure duration used in health risk assessments; therefore, construction activities would not represent the type of long-term TAC emission sources typically subject to health risk assessments. Construction activities would also be subject to and required to comply with California regulations limiting the idling of heavy equipment to no more than five minutes, which would further reduce the exposure of the nearest sensitive receptors to temporary and variable DPM emissions. As such, Project construction would not expose sensitive receptors to substantial TAC concentrations, and impacts would be less than significant.

After Project construction is complete, there would be no changes to Metropolitan's existing operation and maintenance activities at the Project site, which do not currently involve activities that generate TAC emissions. Therefore, Project operation and maintenance would not expose sensitive receptors to substantial TAC concentrations, and no impact would occur.

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 adversely affecting a substantial number of people. The Project site is located more than 1,000 feet from the nearest sensitive receptors, which are residences located approximately 0.2 mile (1,075 feet) to the west. The proposed Project would generate oil and diesel fuel odors from heavy-duty equipment operating at the Project site during construction activities. However, these odors would be localized, limited to the approximately 7.5- to 9.5-month period of construction activities, and would dissipate rapidly with distance. Upon completion of construction activities, there would be no changes to Metropolitan's existing operation and maintenance activities at the Project site, which do not currently generate odorous emissions. Accordingly, the proposed Project would not result in other emissions, such as those leading to odors, adversely affecting a substantial number of people, and no impact would occur.

3.4 Biological Resources

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 Wildlife 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 Wildlife 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.

OVERVIEW OF BIOLOGICAL RESOURCES

Rincon prepared a Biological Resources Assessment report to document existing conditions and evaluate the potential for impacts to biological resources during implementation of the proposed Project. 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 regulated resources, such as protected trees. The Biological Resources Assessment is attached as Appendix C. Rincon also conducted a Jurisdictional Delineation Report to delineate the extent and potential regulatory jurisdiction of wetlands, waters, and riparian habitat, which is included as Appendix D. In addition, Rincon prepared species-specific survey reports to document the results of focused habitat assessments and surveys conducted for bats (Appendix E), western burrowing owl (*Athene cunicularia*) (Appendix F), least Bell's vireo (*Vireo belli pusillus*) (Appendix G), rare plants (Appendix H), and small mammals (Appendix I).

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:

- United States Army Corps of Engineers (USACE) (wetlands and other waters of the United States);
- 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, lakes and streambeds, and state-listed species).

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 value to wildlife.

Listed species are those taxa that are formally designated as endangered or threatened by the federal government (e.g., USFWS, National Marine Fisheries Service) pursuant to the Endangered Species Act (ESA) or those designated or candidates for listing 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. In addition, certain species are identified as Fully Protected by the California Fish and Game Code (Sections 3511, 4700, 5050, and 5515). Furthermore, some species are considered rare in accordance with CEQA (but not formally listed), if the species exists in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens; or is likely to become endangered within the foreseeable future throughout all or a significant portion of its range (CEQA Guidelines Section 15380). These species do not receive statutory protection but may be considered during federal and State environmental review. These species may include those designated as Species of Special Concern or Watch List by CDFW and plants occurring on lists 1 through 4 of the California Native Plant Society (CNPS) California Rare Plant Rank (CRPR) system.

METHODOLOGY

Biological conditions were evaluated by confirming applicable regulations, policies, and standards; reviewing biological literature and querying available databases pertinent to the Project site and vicinity (within nine topographic quadrangles for CDFW's California Natural Diversity Data Base [CNDDB] and CNPS' Inventory of Rare and Endangered Plants of California); and conducting a reconnaissance-level biological survey of the Project site plus a 100-foot survey buffer in all directions (Biological Study Area). Prior to conducting the biological survey, a variety of literature was reviewed to obtain baseline information about the biological resources with potential to occur within the Project site and surrounding area, including databases from CDFW, USFWS, and CNPS. Refer to Appendix C for a full list of literature reviewed.

On October 24, 2023, biologists Jared Reed and Kevin Gugerty from Rincon conducted a reconnaissance-level biological survey by walking through the Biological Study Area (wandering pedestrian transect approach) to document existing site conditions and the potential presence of regulated biological resources, including special-status plant and wildlife species, sensitive plant communities, potentially jurisdictional waters and wetlands, and habitat for nesting birds. Weather conditions were sunny and clear with temperatures between 61 and 69 (degrees Fahrenheit) with no wind and no cloud cover (Appendix C).

On January 8, 2024, biologists Jared Reed and Kevin Gugerty from Rincon conducted an aquatic resources delineation to assess potential jurisdictional waters within the Biological Study Area. Current USACE and State Water Resources Control Board delineation procedures and guidance were used to identify and delineate any wetlands and/or waters of the United States/State potentially subject to USACE and RWQCB jurisdiction (Appendix D). Likewise, current CDFW procedures and guidance were used to identify and delineate any streambeds, rivers, or associated riparian habitat potentially subject to CDFW jurisdiction. Additional detail on the survey methodology is provided in the Jurisdictional Delineation Report included as Appendix D.

Additional, focused biological surveys were conducted in 2024 and 2025 to assess habitat conditions and determine the presence/absence of bats (habitat assessment and emergence survey on June 26, 2024), western burrowing owl (four surveys between April 15 and June 24, 2025), least Bell's vireo (eight surveys between May 14 and July 30, 2024), rare plants (one survey on July 15, 2024), and small mammals (five consecutive nights of trapping from June 10 to 15, 2024). Additional detail on the survey methodologies is provided in reports included as Appendices E through I.

EXISTING BIOLOGICAL CONDITIONS

The Project site is located within the San Jacinto River at the north end of the San Jacinto River Valley and has a relatively uniform elevation at approximately 1,500 feet above mean sea level. Soils within the Project site are mapped as Dello loamy sand, 0 to 5 percent slopes, Tujunga loamy sand, channeled, 0 to 8 percent slopes and Riverwash. Soboba cobbly loamy sand, 2 to 25 percent slopes is mapped outside the Project site but within the 100-foot survey buffer included in the Biological Study Area. Most of the Project site is mapped as Riverwash, which is classified as a hydric soil type (Appendix C).

The Project site has a high level of disturbance, including soil compaction from vehicle use and within an existing laydown area. Vegetation communities documented in the Project site during the October 2023 reconnaissance-level survey include Fremont cottonwood woodland (*Populus fremontii* Woodland Alliance), upland mustards, and fourwing saltbush scrub. Fremont cottonwood woodland is located within the San Jacinto River and is comprised of Fremont cottonwood (*Populus fremontii* ssp. *fremontii*), Goodding's black willow (*Salix gooddingii*), and scattered stands of tamarisk (*Tamarix ramosissima*) and mulefat (*Baccharis salicifolia*). Upland mustards (*Brassica nigra* Herbaceous Semi-Natural Alliance) are located outside the main channel of the San Jacinto River and dominated by shortpod mustard (*Hirschfeldia incana*), Russian thistle (*Salsola tragus*), and common stork's bill (*Erodium cicutarium*). Fourwing saltbush scrub is found in the northwestern portion of the Project site and contains fourwing saltbush (*Atriplex canescens*), red brome (*Bromus rubens*), and horsewheat (*Triticum aestivum*). Disturbed four wing saltbush scrub was mapped within the northern portion of the 100-foot survey buffer included in the

Biological Study Area, on the north side of Soboba Road. This community is similar in species composition to fourwing saltbush scrub but is sparser with large areas of bare or disturbed ground between shrubs and herbaceous vegetation. The developed/disturbed land cover was the only other land cover type documented in the Project site and was identified along the shoulder of Soboba Road and within/along the existing dirt access roads within the Project site (Appendix C).

The Project site contains a portion of the San Jacinto River, which is classified by the National Wetlands Inventory as a Riverine System. More specifically, this river is classified as an intermittent streambed that is intermittently flooded. The river is approximately 150 feet wide within the Project site. Based on the January 2024 field delineation, the portion of the San Jacinto River within the Project site is likely subject to the jurisdiction of USACE, RWQCB, and CDFW (Appendix D).

Wildlife species observed within the Project site during the October 2023 reconnaissance-level survey were limited to common species, including western fence lizard (*Sceloporus occidentalis*), black phoebe (*Sayornis nigricans*), common raven (*Corvus corax*), Bewick's wren (*Thryomanes bewickii*), Nuttall's woodpecker (*Dryobates nuttallii*), American crow (*Corvus brachyrhynchos*), California towhee (*Melozone crissalis*), lesser goldfinch (*Spinus psaltria*), red-tailed hawk (*Buteo jamaicensis*), and bushtit (*Psaltriparus minimus*). Several small mammal burrows were observed near the center of the Project site, but no small mammals or their sign were identified (Appendix C).

One special-status plant species, chaparral sand-verbena (*Abronia villosa* var. *aurita,* California Rare Plant Rank 1B.1), was observed during the October 2023 reconnaissance survey and subsequent focused rare plants survey with 40 individuals present in the Biological Study Area (Appendix H). Focused surveys for least Bell's vireo (federally and state endangered) identified suitable nesting habitat and detected 13 total observations of the species within the Project site plus a 500-foot survey buffer (Appendix G). Yellow warbler (*Setophaga petechia*; California Species of Special Concern [SSC]) was observed within the Project site during biological monitoring conducted by Rincon for emergency repairs in July 2023. Cooper's hawk (*Accipiter cooperii*) is a CDFW Watch List species that was observed within the Project site and 500-foot survey buffer during the focused least Bell's vireo protocol surveys. No burrowing owl (state candidate endangered, California SSC) or sign were observed during the focused western burrowing owl surveys (Appendix F). Focused bat surveys concluded the Project site contains suitable foraging habitat for bats and Fremont cottonwood stands may be used as day roosts, but no night or maternity roosts were observed (Appendix E). Protocol trapping surveys for small mammals identified Los Angeles pocket mouse (*Perognathus longimembris brevinasus*; California SSC) within the Project site and two subspecies of San Diego pocket mouse (*C. fallax fallax* and *C. fallax pallidus*) (Appendix I).

The Project site is located within the Plan Area of the *Habitat Conservation Plan for the Stephens' Kangaroo Rat in Western Riverside County California*, a permit/agreement between the Riverside County Habitat Conservation Agency (RCHCA) and USFWS/CDFW (County of Riverside 1996). The Project site also is located within the boundaries of the *Western Riverside County Multiple Species Habitat Conservation Plan* (MSHCP; County of Riverside 2003), and implementation of the MSHCP is overseen by the Regional Conservation Authority (RCA).

Discussion. Would the Project:

a. *Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

Less Than Significant 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 CDFW or USFWS with incorporation of mitigation measures.

SPECIAL-STATUS PLANTS

The literature review documented 61 special-status plant species within the nine-quadrangle search area. Of these, species ranked as CRPR 1B are considered rare, threatened, or endangered in California and elsewhere and are treated as endangered, threatened, or rare under CEQA. CRPR 1B species warrant particular attention during environmental review and are analyzed separately from other CRPR-ranked species.

Chaparral sand-verbena (CRPR 1B.1) was observed within the Biological Study Area during the July 2024 special-status plant survey. Three additional special-status plant species had a moderate potential to occur within the Project site due to presence of specific habitat requirements and relatively recent occurrences in the CNDDB (less than 25 years). However, these species were not detected during the special-status plant survey, which was conducted at a time when these species would be identifiable, and therefore their status has been reduced to low potential to occur (Appendices C and H).[5] These three species include smooth tarplant (*Centromadia pungens* ssp. *laevis*; CRPR 1B.1), Mojave tarplant (*Deinandra mohavensis*; CRPR 1B.3) and white rabbit-tobacco (*Pseudognaphalium leucocephalum*; CRPR 2B.2). The remaining 57 special-status plant species documented within the nine-quadrangle search area have low potential to occur or are not expected to occur in the Project site (Appendix C). No additional CRPR 2 through 4 species were observed or are expected to occur within the Project site.

Of the 40 chaparral sand-verbena individuals documented within the Biological Study Area, 39 were documented within the San Jacinto River and its banks, and one was documented along a road cut near the center of the Project site. Of these, 28 chaparral sand-verbena individuals are within the Project site (Appendix H). Of the 28 chaparral sand-verbena individuals within the Project site, three individuals are within the permanent impact area, and 17 individuals are within the temporary impact area. The remaining eight individuals are outside of the proposed impact area but within the Project site. Direct impacts to chaparral sand-verbena could include removing or running over individual plants during construction activities. The three chaparral sand-verbena individuals in the permanent impact area would be removed as well as the 17 individuals in the temporary impact area because they are within the understory of Fremont cottonwood trees proposed for removal. Indirect impacts could include spreading invasive species inadvertently transported by construction equipment (e.g., seeds of invasive plant species carried to the site within the undercarriage or tires of heavy equipment that has not been cleaned thoroughly between

[5] The potential for these species to occur has been updated since preparation of the Biological Resources Assessment based on the results of subsequent focused botanical surveys.

construction sites) or dust generated by ground disturbance and the movement of equipment and vehicles within the Project site, which could negatively affect individual plants documented within the Project site and Biological Study Area, or suitable habitat for the species in the future. However, Project impacts would be temporary, and the species would likely recolonize disturbance areas following construction (Appendix C). In accordance with Metropolitan standard practice outlined in Section 01065 of the construction contractor specifications (see Section 1.6.7, *Environmental Requirements for Construction*), the Project Contractor(s) and their personnel would attend a Worker Environmental Awareness Program training that would educate workers on environmental sensitivities at the Project site, including the presence of special-status plant species. Nevertheless, impacts to chaparral sand-verbena would be potentially significant due to the species' special status (CRPR 1B.1) and the fact that Project activities would directly impact approximately 50 percent of the individuals identified during the surveys and could indirectly affect the remaining individuals observed within the Project site and Biological Study Area. Implementation of Mitigation Measures BIO-1 (Special-Status Plant Species Surveys), BIO-2 (Special-Status Plant Species Avoidance and Minimization), and BIO-3 (Special-Status Plant Species Revegetation) would be implemented to avoid and/or minimize potentially significant impacts through pre-activity surveys, avoidance and minimization measures for identified special-status plants, and transplantation of impacted special-status plant individuals outside the construction footprint. With the implementation of these measures, impacts to special-status plant species would be reduced to less-than-significant levels because direct impacts would be minimized to the extent practicable.

SPECIAL-STATUS WILDLIFE

The literature review documented 48 special-status wildlife species within the nine-quadrangle search area. Of these, nine special-status wildlife species were determined to either have a moderate to high potential to occur within the Biological Study Area or to be present within the Biological Study Area due to presence of specific habitat requirements, relatively recent occurrences tracked in the CNDDB (less than 25 years), and/or observations from past Project-specific surveys. Table 3.4-1 lists the special-status wildlife species with moderate to high potential to occur within the Biological Study Area, which are discussed in further detail below. The remaining 39 special-status wildlife species have low or no potential to occur within the Biological Study Area. Although western burrowing owl has a low potential to occur, it is included in this analysis given its status as a California SSC and a candidate for listing under CESA (Appendix C).

Table 3.4-1. Special-Status Wildlife Species with Moderate to High Potential to Occur Within the Project Site

Common Name	Scientific Name	Status
Least Bell's vireo	*Vireo bellii pusillus*	Federal Endangered/State Endangered
Yellow warbler	*Setophaga petechia*	CDFW SSC
Cooper's hawk	*Accipiter cooperii*	CDFW Watch List
Pallid bat	*Antrozous pallidus*	CDFW SSC
Townsend's big-eared bat	*Corynorhinus townsendii*	CDFW SSC
Western yellow bat	*Lasiurus xanthinus*	CDFW SSC
Stephens' kangaroo rat	*Dipodomys stephensi*	Federal Threatened/State Threatened
Los Angeles pocket mouse	*Perognathus longimembris brevinasus*	CDFW SSC
San Bernardino kangaroo rat	*Dipodomys merriami parvus*	Federal Endangered/State Endangered

Notes: CDFW (California Department of Fish and Wildlife), SSC (Species of Special Concern)
Source: Appendix C

Least Bell's Vireo

Least Bell's vireo is listed as endangered under the federal ESA and CESA. Focused surveys for least Bell's vireo were conducted within suitable habitat on the Project site plus a 500-foot survey buffer from May to July 2024. The focused surveys concluded that the Project site contains suitable nesting habitat for the species with 13 total observations. Least Bell's vireo were detected in two territories within the survey area - a western territory and a southeastern territory. Individuals were observed singing and foraging in three identified habitat types, including Fremont cottonwood forest and woodland, tamarisk thickets, and fourwing saltbush scrub. No nests were directly observed during the focused surveys; however, the western territory likely contained one nest based on observations of a male singing within a dense tamarisk thicket during the first survey and additional observations of a fledgling and the male near the same area during the fourth, seventh, and eighth surveys. Additionally, in the southeastern territory, there were observations of a male singing and observations of a fledgling during the first, fifth, seventh and eighth surveys, indicating the likely presence of a nest in this area. Out of the 13 observations, only one was within the Project site, and the remaining observations were outside of the Project site and within the 500-foot survey buffer (Appendix G).

Potential direct impacts to least Bell's vireo could include mortality if vegetation or trees with active nests are removed during Project construction. Indirect impacts could include removal of suitable habitat during Project construction as well as disturbance to active nests or disturbance to breeding, feeding, foraging, or nesting behavior from dust, vibration, or noise generated by Project construction (Appendix C). Suitable habitat within the Project site includes Fremont cottonwood woodland and tamarisk. The proposed Project would result in approximately 0.87 acre of permanent impacts to habitat (0.75 acre of Fremont cottonwood woodland, 0.12 acre of tamarisk) and approximately 1.17 acres of temporary impacts to habitat (1.17 acres of Fremont cottonwood woodland). Therefore, direct and indirect impacts to least Bell's vireo would be potentially significant and could result in "take" of this species, as defined by the federal ESA and CESA. Metropolitan would obtain the appropriate federal and state permits from USFWS and CDFW, respectively, to authorize the incidental take of least Bell's vireo. Implementation of protection measures and compensatory mitigation for least Bell's vireo would be required as conditions of those federal and state permits. In addition, Metropolitan would implement avoidance, minimization, and mitigation measures, including but not limited to:

- Vegetation removal would occur outside the least Bell's vireo nesting season.
- Metropolitan standard practices, outlined in Section 01065 of the construction contractor specifications (see Section 1.6.7, *Environmental Requirements for Construction*), would include:
  - Conducting pre-activity nesting bird surveys within the Project site for construction activities occurring during the nesting bird season; and
  - Implementing appropriate avoidance buffers if active nests are identified until the young have fledged from the nest or the nest is inactive.

Nevertheless, implementation of Mitigation Measures BIO-4 (Least Bell's Vireo Pre-Construction Survey and Avoidance) and BIO-5 (Compensatory Mitigation for Fremont Cottonwood Woodland, Jurisdictional Waters, and Least Bell's Vireo Habitat) would be implemented to avoid and/or minimize potentially significant impacts through pre-activity surveys, avoidance and minimization measures for identified active nests, and compensatory mitigation for habitat removal. With implementation of these measures and adherence to CDFW and USFWS permit requirements, impacts to least Bell's vireo would be reduced to less-than-significant levels because direct and indirect impacts would be avoided, minimized, and compensated for through on-site or off-site restoration, payment to an in-lieu fee program, or purchase of mitigation credits at a minimum 1:1 ratio.

Yellow Warbler and Cooper's Hawk

Yellow warbler is a CDFW Species of Special Concern that was observed within the Project site during biological monitoring conducted for emergency repairs in July 2023. The Fremont cottonwood woodland within the Project site provides suitable nesting and foraging habitat for this species. Cooper's hawk is a CDFW Watch List species that was observed within the Project site and 500-foot survey buffer during the focused least Bell's vireo protocol surveys conducted between May to July 2024 (Appendix G).

Potential direct impacts to yellow warbler and Cooper's hawk could include mortality through vegetation or tree removal during Project construction that affects active nests, and potential indirect impacts could include disturbance to active nests or nesting activity through dust, vibration, or noise during Project construction (Appendix C). To avoid the nesting season and potential direct impacts to nesting yellow warbler and/or Cooper's hawk, vegetation removal would occur outside of nesting bird season. Additionally, in accordance with Metropolitan standard practice outlined in Section 01065 of the construction contractor specifications (see Section 1.6.7, *Environmental Requirements for Construction*), Metropolitan would perform pre-activity nesting bird surveys within the Project site for construction activities occurring during the nesting bird season, such as installation of the proposed protection structures, which is anticipated to begin during the dry season in May 2027, and implement appropriate avoidance buffers if active nests are identified and until the young have fledged from the nest or the nest fails. With adherence to Metropolitan standard practice related to the protection of biological resources, impacts to yellow warbler and Cooper's hawk would be less than significant because direct impacts would be avoided and indirect impacts would be limited and not likely to substantially reduce local populations or their ability to persist once the proposed Project is complete.

Western Burrowing Owl

Western burrowing owl is a CDFW SSC and a CESA candidate species with low potential to occur in the Biological Study Area. Protocol surveys conducted between April 15 and June 24, 2025, identified elements of suitable habitat present within the Biological Study Area. However, no suitable burrows (greater than four inches in diameter) or observations of sign or individuals were observed during the October 2023 reconnaissance survey; the focused surveys completed in January and May through July 2024; the 2025 protocol surveys (Appendices C and F); or during survey and monitoring efforts during the emergency repairs between July 24 and August 8, 2023. The repeated negative findings indicate a low likelihood that burrowing owls occupy the Project site.

Nevertheless, suitable habitat is present within the Project site, and the species is mobile and could move into the Project site prior to the start of Project construction. If present at the time of construction, potential direct impacts to western burrowing owl could include disturbance or mortality of active nests, and potential indirect impacts could result from dust, vibration, or noise (Appendix C) occurring within 165 feet of active nests or nesting activity during the wintering season. In accordance with Metropolitan standard practice outlined in Section 01065 of the construction contractor specifications (see Section 1.6.7, *Environmental Requirements for Construction*), Metropolitan would perform pre-activity nesting bird surveys within the Project site for construction activities occurring during the nesting bird season, such as installation of the proposed protection structures, which is anticipated to begin during the dry season in May 2027. Avoidance buffers would be implemented if active nests are detected.

Because wintering owls may occur within the Project site outside the nesting bird season, implementation of Mitigation Measure BIO-6 (Western Burrowing Owl Pre-Activity Survey) would be required to avoid and/or minimize impacts to wintering owls. With adherence to Metropolitan standard practice related to the protection of biological resources and implementation of Mitigation Measure BIO-6, impacts to western burrowing owl would be reduced to less-than-significant levels because direct impacts would be avoided and indirect impacts would be minimized such that local populations would not be substantially affected.

Special-Status Bats

Three special-status bat species designated as CDFW SSC – pallid bat, Townsend's big-eared bat, and western yellow bat - have moderate potential to occur within the Project site. Focused surveys for special-status bats were conducted within the Project site and a 300-foot survey buffer in June 2024. The surveys concluded the Project site contains suitable foraging habitat for bats, although no night or maternity roosts were observed. The acoustic surveys detected the presence of canyon bat (*Parastrellus hesperus*), Mexican free-tailed bat (*Tadarida brasiliensis*), silver-haired bat (*Lasionycteris noctivagans*), western yellow bat, and Yuma myotis (*Myotis yumanensis*). Of these bat species observed, only the western yellow bat is a CDFW SSC and is thus the focus of this analysis (Appendix E).

The riparian woodlands within the Project site provide potentially suitable roosting and foraging habitat for bats, although no night or maternity roosts were observed during the focused surveys. The proximity of the Project site to Lake Perris and Diamond Valley Lake increases the likelihood for the western yellow bat to be present within the Project site. In addition, pallid bat and Townsend's big-eared bat could occupy the Project site at the time of construction given their mobility and the presence of suitable foraging habitat and roosting trees. Potential direct impacts to western yellow bat and other special-status bats could include mortality through tree removal during Project construction that affects active roosts, and potential indirect impacts could include disturbance to active roosts or roosting activity through dust, vibration, or noise during Project construction (Appendix C). Therefore, impacts to western yellow bat and other special-status bats would be potentially significant, and implementation of Mitigation Measure BIO-7 **(**Special-Status Bats Avoidance and Minimization**)** would be required to avoid impacts to these species. With implementation of Mitigation Measure BIO-7, impacts to special-status bat species would be reduced to less-than-significant levels because direct impacts would be avoided and indirect impacts would be limited and not likely to substantially reduce local populations or their ability to persist once the proposed Project is complete.

Special-Status Small Mammals

The Project site is located within USFWS-designated critical habitat for San Bernardino kangaroo rat, which is listed as endangered under the federal ESA and endangered under CESA. In addition, Los Angeles pocket mouse, a CDFW SSC, and Stephen's kangaroo rat, which is listed as threatened under the federal ESA and CESA, have moderate potential to occur within the Biological Study Area (Appendix C).

Several small mammal burrows were observed near the center of the Project site during the October 2023 reconnaissance survey, and protocol trapping surveys for small mammals were conducted within the Project site in June 2024. The June 2024 survey identified Los Angeles pocket mouse as well as two subspecies of San Diego pocket mouse, which are listed as CDFW Special Animals but are not designated as CDFW SSC. While several recent CNDBB occurrences of San Bernardino kangaroo rat and Stephen's kangaroo rat are tracked within the San Jacinto quadrangle (Appendix C), no San Bernardino kangaroo rat or Stephen's kangaroo rat were detected (Appendix I). Therefore, Los Angeles pocket mouse is the focus of this analysis.

One Los Angeles pocket mouse individual was trapped within the Project site during the June 2024 protocol trapping surveys (Appendix I). Direct impacts to Los Angeles pocket mouse may include crushing/killing of individuals with equipment or vehicles or disturbing existing burrows during Project construction. Potential indirect impacts could include increased sound and vibration levels that displace individuals as well as exposure to dust during Project construction. Furthermore, vegetation loss could impact the species by reducing available habitat (Appendix C). However, given that only one individual Los Angeles pocket mouse was trapped over the course of the protocol surveys, direct and indirect impacts from the proposed Project are unlikely to cause the species' local population to drop below a self-sustaining level. In addition, the proposed Project would result in approximately 0.03 acre of permanent impacts and 2.86 acres of temporary impacts to suitable scrub and herbaceous habitat for the species, which is a limited amount in comparison to the substantial acreage of suitable habitat present in the open space and conserved lands that surround the Project site. Furthermore, in accordance with Metropolitan standard practice outlined in Section 01065 of the construction contractor specifications (see Section 1.6.7, *Environmental*

Requirements for Construction), the Project Contractor(s) and their personnel would attend a Worker Environmental Awareness Program training that would educate workers on environmental sensitivities at the Project site, including the potential for Los Angeles pocket mouse to be present. Therefore, potential impacts to Los Angeles pocket mouse would be less than significant.

MITIGATION MEASURES

BIO-1 Special-Status Plant Species Survey

A seasonally timed, pre-activity survey for special-status plants shall be completed prior to any vegetation removal, grubbing, or other ground-disturbing activity (including staging and mobilization). The survey shall be timed to coincide with the blooming period of chaparral sand-verbena (March to September), smooth tarplant (April to September), Mojave tarplant (June to October), and white rabbit-tobacco (August to November). The survey shall provide specific, updated information on the locations of chaparral sand-verbena individuals and determine the continued absence of other special-status plant species. The plant survey shall be conducted by a qualified botanist and shall cover suitable habitat within the entire area proposed for disturbance (including areas for staging and mobilization). All special-status plant species identified on site shall be mapped onto a site-specific aerial photograph and topographic map. The survey shall be conducted in accordance with the most current protocols established by CDFW and USFWS. If federally listed, state listed, or California Rare Plant Rank 1B species are found, avoidance and minimization measures shall be implemented in accordance with Mitigation Measure BIO-2. A report of the survey results shall be submitted to Metropolitan.

BIO-2 Special-Status Plant Species Avoidance and Minimization

Chaparral sand-verbena and any newly identified federally listed, state listed, or California Rare Plant Rank 1B species shall be avoided, if feasible. Occurrences of these special-status plant species that are not within the immediate disturbance footprint but located within 50 feet of disturbance limits shall be protected at least 30 feet beyond their extent, or other distance as approved by a monitoring biologist, to minimize the potential for impacts. If avoidance of these special-status plant species is not feasible, salvage and transplantation shall be implemented in accordance with Mitigation Measure BIO-3. Any avoidance and minimization measures implemented shall be documented and included in the special-status plant survey report prepared under Mitigation Measure BIO-1.

BIO-3 Special-Status Plant Species Salvage and Transplantation

If avoidance of chaparral sand-verbena or any newly identified federally listed, state listed, or California Rare Plant Rank 1B species within the Project site is not feasible, the impacted specimens, seed, and surrounding topsoil shall be salvaged and redistributed into adjacent, undisturbed suitable habitat. Any salvage and transplantation efforts shall be documented and included in the special-status plant survey report prepared under Mitigation Measure BIO-1.

BIO-4 Least Bell's Vireo Pre-Construction Survey and Avoidance

To avoid potential direct and indirect impacts to least Bell's vireo, Metropolitan shall implement the following measures for all Project work areas at or within 300 feet of riparian vegetation known to be occupied by least Bell's vireo based on 2024 protocol-level survey results, as well as pre-construction surveys conducted by a qualified biologist/ornithologist:

- Construction (primarily ground disturbance) activities that occur at or within 300 feet of riparian areas known to be occupied by least Bell's vireo shall occur outside of least Bell's vireo nesting season (generally March 1 to August 31) to the extent feasible.
- If construction activities must occur during least Bell's vireo nesting season and could encroach within 300 feet of suitable least Bell's vireo habitat, a qualified biologist/ornithologist shall conduct a pre-construction survey no more than seven days prior to initiation of construction activities in all areas deemed suitable for least Bell's vireo, including areas determined occupied by least Bell's vireo during the 2024 protocol-level surveys.
  - If least Bell's vireo is not detected within riparian habitat located at or within 300 feet of construction activities, no further action or exclusion buffers are required.
  - If least Bell's vireo is detected and construction activities are planned at or within 300 feet of occupied least Bell's vireo habitat, the following measures shall be implemented:
    - A qualified biologist/ornithologist shall establish a 300-foot exclusion buffer measured from the edge of the occupied riparian habitat to the closest edge of the construction work area, if feasible. If it is not feasible to maintain a 300-foot exclusion buffer due to site constraints, the qualified biologist/ornithologist may reduce the buffer based on the intensity of construction activities, construction noise levels, and observed behavior of individual birds. The qualified biologist/ornithologist shall be present for the duration of the construction activities that occur at or within 300 feet of the edge of riparian areas occupied by least Bell's vireo. If any signs of nest disturbance or stress are observed, then additional avoidance and minimization measures shall be implemented, such as installing noise barriers or modifying buffer distances.
    - If an appropriate exclusion buffer is unable to be established that would ensure direct and indirect impacts to nesting least Bell's vireo can be fully avoided, construction shall be halted and shall not occur until it is confirmed by the qualified biologist/ornithologist that the young are no longer dependent on the nest.
    - Monitoring reports shall document the ambient noise level recorded prior to construction initiation, as well as document the recorded noise levels used to determine least Bell's vireo exclusion buffer distances, whether increased or reduced.

BIO-5 Compensatory Mitigation for Fremont Cottonwood Woodland, Jurisdictional Waters, and Least Bell's Vireo Habitat

Compensatory mitigation for impacts to Fremont cottonwood woodland and jurisdictional waters regulated by USACE, RWQCB, and CDFW shall be identified prior to disturbance of these features. Mitigation shall be required at a minimum ratio of 1:1 for temporary and permanent impacts, including removal of mature cottonwood trees, unless a higher ratio is required by

RWQCB, CDFW, or USACE during their respective permitting processes. Mitigation may take the form of permittee-responsible on-site or off-site mitigation, payment to an in-lieu fee program, or the purchase of credits from an approved mitigation bank.

If on-site or off-site restoration would occur, Metropolitan shall retain a qualified biologist to develop a Habitat Revegetation, Restoration, and Monitoring Program prior to the commencement of Project construction (including, but not limited to, site preparation, staging and mobilization, vegetation clearance/mowing/trimming, grading, and excavation). At a minimum, the program shall include the following:

- A description of the purpose and goals of the restoration
- Identification of success criteria and performance standards
- Methods of site preparation, including topsoil salvage and replacement procedures
- Irrigation plan and schedule
- Best management practices
- Maintenance and monitoring program
- Adaptive management strategies
- Key stakeholders and responsible parties
- Funding
- Contingencies

The Habitat Revegetation, Restoration, and Monitoring Program plant palette shall avoid use of species from MSHCP Table 6-2 (Plants to be Avoided Within or Adjacent to Conservation Areas) for any restoration of temporary impacts.

If payment to an in-lieu fee program or the purchase of credits from an approved mitigation bank is utilized, Metropolitan shall retain proof of purchase in the Project file.

BIO-6 Western Burrowing Owl Pre-Activity Survey and Avoidance

Metropolitan shall retain a qualified biologist to conduct a pre-activity burrowing owl clearance survey of suitable habitat within the Project site and a 500-foot buffer, as feasible, to confirm the absence of wintering western burrowing owl individuals, no more than 14 days prior to start of construction. The survey methodology shall be consistent with the methods outlined in the CDFW *Staff Report on Burrowing Owl Mitigation* (CDFW 2012). If no active wintering owls or evidence of occupied habitat is identified, then Project construction in suitable habitat may commence, and no further action is required.

If active wintering owls are detected within the Project site, Metropolitan shall implement the following measures to avoid and/or minimize potential impacts in accordance with the CDFW *Staff Report on Burrowing Owl Mitigation* (CDFW 2012):

- A qualified biologist shall be present on site during initial ground disturbing activities in suitable burrowing owl habitat

- During the nonbreeding (winter) season (September 1 to January 31), ground-disturbing work can proceed near active burrowing owl burrows at the discretion of the qualified biologist as long as the work occurs no closer than 165 feet (50 meters) from the burrow, depending on whether the level of disturbance is low and if the active burrow is not directly affected by the Project activity. A smaller/larger buffer may be established by the qualified biologist following monitoring and assessment of the Project's effects on the burrowing owl(s).
- Smaller non-disturbance buffers may be permitted in the winter for burrowing owl individuals if a noise and visual barrier, such as hay bale walls, is installed between the occupied burrowing owl burrow and construction activities, if the qualified biologist determines the reduced buffer will provide adequate protection.
- If active winter burrows are found that would be directly affected by ground-disturbing activities and cannot be avoided, Metropolitan shall coordinate with CDFW to determine a course of action and obtain incidental take authorization, if necessary.

A final letter shall be prepared by the qualified biologist documenting the results of the pre-activity surveys and monitoring, which shall be submitted to Metropolitan.

BIO-7 Special-Status Bats Avoidance and Minimization

To the extent feasible, demolition or disturbance of suitable bat roosting habitat (e.g., live and dead trees) shall be scheduled between October 1 and February 28, outside of the maternity roosting season. If suitable roost trees must be encroached during the maternity season (March 1 to September 30) or structures must be removed at any time of the year, Metropolitan shall retain a qualified bat specialist to conduct a pre-activity survey no more than seven days prior to the start of Project construction in a given work area to identify those trees proposed for disturbance that could provide hibernacula or nursery colony roosting habitat for bats. The trees or structures shall be closely inspected by the bat specialist to determine the presence or absence of roosting bats. If potentially suitable hibernacula or nursery colony roosting habitat for bats is not present in areas anticipated to be directly impacted by Project construction, no additional action is required.

If bats are not detected, but the bat specialist determines roosting bats may be present at any time of year, trees shall be felled in a controlled manner using heavy machinery. To ensure the optimum warning for any roosting bats that may still be present, the trees or structures shall be nudged lightly two to three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. Trees or structures may then be pushed to the ground slowly under the supervision of a qualified bat specialist. Felled trees shall remain in place until they are inspected by a bat specialist. Trees that are known to be bat roosts shall not be sawed or mulched immediately. A period of at least 48 hours shall elapse prior to such operations to allow bats to escape.

The bat specialist shall document all demolition monitoring activities and prepare a summary report for Metropolitan upon completion of tree removal activities.

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 Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant with Mitigation Incorporated. 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 CDFW or USFWS with incorporation of mitigation measures. The only sensitive natural community located within the Project site is Fremont cottonwood woodland, which has a state rarity ranking of S3 and a global rarity ranking of G4 (Appendix C). Construction of the proposed Project would require the trimming or removal of some trees within the Fremont cottonwood woodland. Up to 17 Fremont cottonwood trees, two Goodding's black willows, four dead/unidentifiable trunks, and several clusters of tamarisk would be removed during Project construction. Based on the proposed limits of disturbance, the proposed Project would impact up to approximately 1.92 acres of Fremont cottonwood woodland, including up to approximately 0.75 acre of permanent impacts and approximately 1.17 acres of temporary impacts. In accordance with Metropolitan standard practice outlined in Section 01065 of the construction contractor specifications (see Section 1.6.7, *Environmental Requirements for Construction*), the Project Contractor(s) would be required to avoid or minimize any additional tree disturbances outside of those identified for trimming or removal in construction drawings. Nevertheless, because trimming and removal of trees would occur, impacts to Fremont cottonwood woodland would be potentially significant, and implementation of Mitigation Measure BIO-5 (Compensatory Mitigation for Fremont Cottonwood Woodland, Jurisdictional Waters, and Least Bell's Vireo Habitat) would be required to compensate for such impacts. With adherence to Metropolitan standard practice related to the protection of biological resources and implementation of Mitigation Measure BIO-5, impacts to the Fremont cottonwood woodland sensitive natural community would be reduced to less-than-significant levels because temporary and permanent impacts would be mitigated at a minimum ratio of 1:1. Mitigation would take the form of permittee-responsible on-site or off-site mitigation, payment to an in-lieu fee program, or the purchase of credits from an approved mitigation bank.

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?

Less Than Significant with Mitigation Incorporated. 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 with incorporation of mitigation measures. Portions of the Project site within the San Jacinto River are potentially subject to the jurisdiction of USACE, RWQCB, and CDFW (Appendix D). Construction of the proposed Project would directly impact up to approximately 2.54 acres (413 linear feet) of non-wetland waters of the U.S. potentially subject to USACE and RWQCB jurisdiction, which includes approximately 0.48 acre (413 linear feet) of permanent impacts and approximately 2.06 acres (360 linear feet) of temporary impacts. The proposed Project would also impact up to approximately 3.53 acres (413 linear feet) of streambed and riparian habitat potentially subject to CDFW jurisdiction (Appendix C), consisting of approximately 0.66 acre (413 linear feet) of permanent impacts and approximately 2.87 acres (360 linear feet) of temporary impacts. It should be noted that permanent and temporary linear foot impacts overlap substantially and are not additive.

Direct impacts to potentially jurisdictional waters and riparian habitat would include vegetation removal and temporary alteration of the channel of the San Jacinto River during Project construction through ground disturbance and installation of a temporary diversion system to allow for diversion of surface water flows should a precipitation event occur. Indirect impacts would include adverse effects to water quality from material spills or sediment runoff from the construction site. In accordance with Metropolitan standard practice outlined in Section 01065 of the construction contractor specifications (see Section 1.6.7, *Environmental Requirements for Construction*), the Project Contractor(s) would be required to implement best management practices to avoid debris, hazardous materials, and other types of pollution from impacting water quality, which would minimize the potential for indirect impacts to occur. Following the construction period, the Project site would be similar to existing conditions, with the pipelines covered with substrate that matches the existing contours of the streambed, and there would be no changes to Metropolitan's existing operation and maintenance activities at the Project site. Because potentially jurisdictional waters would be directly impacted during Project construction, impacts to potentially jurisdictional waters would be potentially significant, and implementation of Mitigation Measure BIO-5 (Compensatory Mitigation for Fremont Cottonwood Woodland, Jurisdictional Waters, and Least Bell's Vireo Habitat) would be required to compensate for such impacts. With adherence to Metropolitan standard practices related to the protection of biological resources and implementation of Mitigation Measure BIO-5, impacts to potentially jurisdictional waters would be reduced to less-than-significant levels because temporary and permanent impacts would be mitigated at a minimum ratio of 1:1. Mitigation would take the form of permittee-responsible on-site or off-site mitigation, payment to an in-lieu fee program, or the purchase of credits from an approved mitigation bank.

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. No, the proposed Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or disrupt native nursery sites. The San Jacinto River is classified as an intermittent streambed that is intermittently flooded and is approximately 150 feet wide within the Biological Study Area. No water has been present in the river during any of the monitoring and surveys completed during various seasons between 2023 and 2025. In addition, no occurrences of special-status fish species are documented in CNDDB or USFWS's Information for Planning and Consultation system, and none were observed during monitoring and surveys completed in the Biological Study Area (Appendix C). No native wildlife nursery sites (e.g., water bird nesting colonies, bat maternity roosts) were identified within the Project site. The Project site is surrounded by undeveloped land and open space, including the San Jacinto Mountain foothills, which provide a multitude of regional wildlife movement opportunities within and adjacent to the Project site. In addition, the Project site is not in an Essential Connectivity Area; however, it is less than one mile south of the Natural Landscape Block that includes the San Jacinto Mountains. Common wildlife associated with riparian and adjacent scrub habitats could move through the Project site because the San Jacinto River serves as a habitat linkage in the area at large. Disturbance-tolerant species, such as California ground squirrel (*Spermophilus beecheyi*), raccoon (*Procyon lotor*), and coyote (*Canis latrans*), are most likely to utilize these local wildlife corridors; however, the Project site could also be utilized for movement by special-status wildlife species associated with riparian woodland habitats (Appendix C).

The proposed Project would not involve the construction of fences or other barriers that could permanently inhibit wildlife movement, and conserved open space areas to the southwest would remain undisturbed and available for facilitating movement of wildlife species. Although no nighttime lighting would be required, project construction activities during early morning and late afternoon hours in the fall, winter, and early spring may require limited construction lighting, and Project construction would temporarily increase noise and human presence at the Project site, which could potentially alter wildlife movement behavior (Appendix C). However, in accordance with Metropolitan standard practice outlined in Section 01065 of the construction contractor specifications (see Section 1.6.7, *Environmental Requirements for Construction*), the Project Contractor(s) would be required to exercise special care to direct floodlights to shine downward and to shield them. In addition, based on the short-term duration of Project construction (anticipated to be approximately eight months), the potential limited and temporary deterrence of wildlife movement through the San Jacinto River corridor is unlikely to result in substantial temporal loss of movement functions and values in and around the Project site. Following the construction period, the Project site would be similar to existing conditions, and there would be no changes to Metropolitan's existing operation and maintenance activities at the Project site. Given the substantial amount of open space in the surrounding area and the temporary nature of Project construction activities, the proposed Project would not substantially interfere 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, and impacts would be less than significant.

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. The Riverside County Code does not provide protection for the species of trees observed within the Project site, and compliance with County of Riverside Ordinance No. 663 (Stephens' Kangaroo Rat Mitigation Fee Ordinance) is addressed under threshold 3.4(f). No other local policies or ordinances protecting biological resources were determined to be applicable to the proposed Project (Appendix C). Therefore, no impact 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?*

No Impact. 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 with incorporation of mitigation measures.

STEPHENS' KANGAROO RAT HABITAT CONSERVATION PLAN

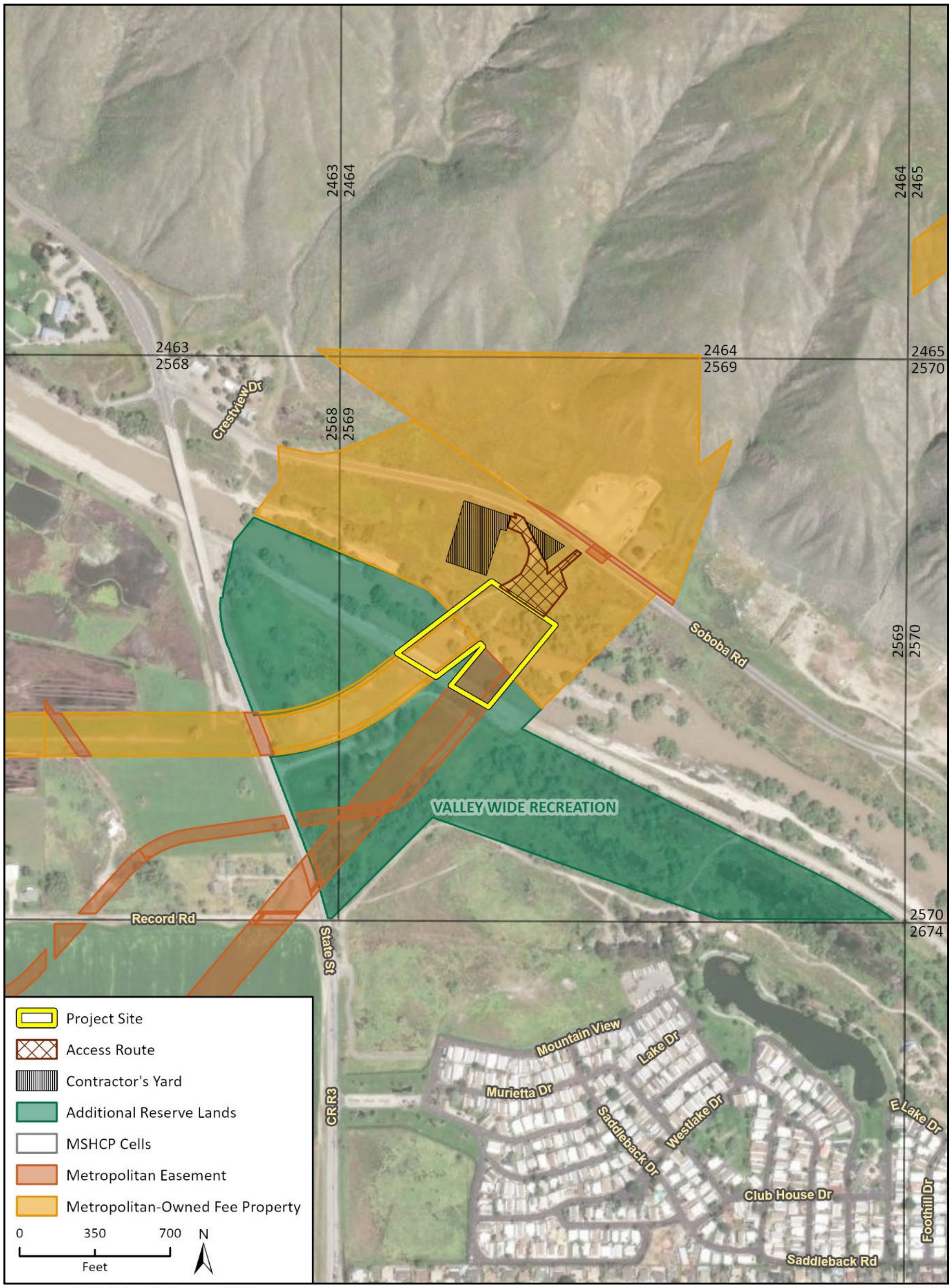
Protocol trapping surveys for small mammals were conducted in June 2024. No Stephens' kangaroo rat was trapped (Appendix I). In addition, although Metropolitan is not a Participant in the Stephens' Kangaroo Rat Habitat Conservation Plan, Metropolitan is covered for operations and maintenance activities. The proposed Project constitutes an operations and maintenance project rather than the development of new facilities. Although incidental take of Stephens' kangaroo rat is not anticipated to occur, this exemption allows for incidental take occurring in conjunction with all operations and maintenance activities conducted by Metropolitan (County of Riverside 1996). Therefore, the proposed Project would not conflict with the provisions of the *Habitat Conservation Plan for the Stephens' Kangaroo Rat in Western Riverside County California*, and no impact would occur.

WESTERN RIVERSIDE COUNTY MULTIPLE SPECIES HABITAT CONSERVATION PLAN

Metropolitan is not a Permittee in the MSHCP and is not seeking a local discretionary permit from a Permittee. However, Metropolitan may choose to use the MSHCP Participating Special Entity (PSE) process for incidental take coverage of listed species instead of ESA Section 7 and California Fish and Game Code Section 2081 or 2080.1.

The Project site is located in Subunit 1 - Gilman Springs/Southern Badlands of the MSCHP's San Jacinto Valley Area Plan and within Criteria Cell 2569 (Figure 3.4-1). Project activities would occur entirely within Metropolitan's fee-owned property or existing legal easement (Figure 3.4-1). Metropolitan's fee-owned property and easement associated with the Project site have legally been in existence since 1933 for the fee-owned property and since 1949 and 1959 for property under easement. However, in January 2024, the RCA acquired parcels in this area that are now MSHCP Conservation Land, specifically Additional Reserve Land (ARL). As shown on Figure 3.4-1, Metropolitan fee-owned property was appropriately carved out of the ARL; however, its easement was not, and as a result, ARL now overlaps with a portion of the Project site. The ability for Metropolitan to operate and maintain its facilities, and upgrade when needed, is essential to the continued provision of adequate water supplies for present and future residents of western Riverside County and within its rights as a pre-existing easement holder. The portion of the Project site that overlaps with the ARL would occur entirely within Metropolitan's pre-existing pipeline easements established in 1949 and 1958, which predate the inclusion of this property into the reserve lands of the Western Riverside County MSHCP (January 2024). Metropolitan's easements in the Project area are senior and remain enforceable. As such, Metropolitan's use of this easement does not constitute a new encroachment into the reserve lands of the Western Riverside County MSHCP. Therefore, the proposed project would not conflict with the Western Riverside County MSHCP.

Figure 3.4-1. Project Site in Relation to MSHCP Elements



Imagery provided by Esri and its licensors © 2025.
Additional data sourced from WRCRCA, 2025.

24-17116 BIO
Fig 3.4-1 MSHCP

3.5 Cultural Resources

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 formal cemeteries?	☐	☐	☒	☐

Significance criteria established by CEQA Guidelines, Appendix G.

CULTURAL RESOURCES OVERVIEW

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 (Abdo et al. 2025).

REGULATORY FRAMEWORK

CEQA requires a Lead Agency to determine whether a project may have a significant effect on historical resources (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 (NRHP) 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 and previously conducted cultural resources studies within the Project site and a 0.5-mile buffer surrounding it. On June 10, 2025, staff from the South Coastal Information Center (SCIC) at San Diego State University conducted the CHRIS search for the Project site. In addition, Rincon completed a review of the NRHP, the CRHR, the California Historical Landmarks list, the Built Environment Resources Directory and its predecessor the California State Historic Property Data File, and the Archaeological Determination of Eligibility list. Rincon also reviewed a variety of primary and secondary source materials relating to the history and development of the Project site and its surroundings. Sources included, but were not limited to, historical topographic maps, historical aerial photographs, geologic maps, and soil survey maps (Abdo et al. 2025).

The SCIC records search identified seven cultural resources within the Project site or within a 0.5-mile buffer, including one pre-contact site, five historic-period built environment resources, and one built environment historic district. Of these resources, only a portion of the built environment historic district (the CRA Historic District [P-33-011265]) is located within the Project site (Abdo et al. 2025).

A Sacred Lands File (SLF) search was completed by the Native American Heritage Commission (NAHC) with positive results, meaning sacred lands have been reported near the Project site. The SLF results do not provide specific details on the nature or precise location of Sacred Lands or whether they are related to any cultural resources recorded by the CHRIS at the SCIC; thus, additional details cannot be provided (Abdo et al. 2025).

Rincon Archaeologist Dylan Sparkman conducted a pedestrian field survey of the Project site on June 18, 2025, to identify archaeological and built environment resources. No surface manifestation of the previously recorded segment of the CRA (P-33-011265) was encountered within the Project site, and no surface evidence of archaeological resources was identified as a result of the survey (Abdo et al. 2025).

A geoarchaeological review was completed that indicates the Project site has been subject to previous historic and modern disturbance associated with construction and maintenance of the CRA, including the three underground pipelines within the Project site (CRA Casa Loma Siphon No. 1, CRA Casa Loma Siphon No. 2, and San Jacinto Pipeline). The historical map and aerial photograph review indicates the Project site has undergone extensive grading starting in the late 1930s as a result of construction of the existing CRA, including the San Jacinto Tunnel West Portal and CRA Casa Loma Siphon No. 1, and the later construction of the CRA Casa Loma Siphon No. 2, San Jacinto levee, and the San Jacinto River recreational park in 1959 to 1960. Furthermore, the Project site is located adjacent to and within the San Jacinto River channel. The geoarchaeological research indicates Holocene-age gravel, sand, and clay of valley areas are present within the entire Project site. While Holocene-age sediments dating to the period of human occupation of the region may bury and preserve archaeological deposits, the Project site is located adjacent to and within an active river channel, which indicates continuous disturbances as a result of seasonal water flow activity. Given the lack of buried topsoil within the underlying soil series along with previous grading and construction activities, the geoarchaeological review determined the Project site has low sensitivity for the presence of intact subsurface archaeological deposits (Abdo et al. 2025).

Discussion. Would the Project:

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 CEQA Guidelines Section 15064.5.

Although seven cultural resources were identified within a 0.5-mile radius of the Project site, only three of those resources have been identified as eligible or listed historical resources under CEQA. All three eligible/listed historical resources are located within 0.25 mile of the Project site. Each of these is discussed in the following subsections. In summary, the proposed Project would not result in a substantial adverse change in the significance of these three historical resources, and no impact would occur.

Colorado River Aqueduct (P-33-011265)

Resource P-33-011265, the CRA Historic District, includes a one-mile-wide corridor extending from the Whitsett Pumping Plant (located near Lake Havasu in eastern San Bernardino County) to the eastern edge of Lake Mathews (in western Riverside County), including the western entrance of the San Jacinto, Bernasconi, and Valverde tunnels and the Casa Loma Siphon No. 1 and the Casa Loma Siphon No. 2, to encompass the aqueduct canal structure, pumping stations, power lines, access roads, pumping plant villages, and other associated infrastructure (inclusive of the three pipelines in the Project site) that allowed the CRA to be constructed and maintained over the course of time. The CRA Historic District was formally determined eligible for listing in the NRHP and CRHR as part of the environmental review process for a previous project in 2010 and therefore qualifies as a historical resource under CEQA as defined in CEQA Guidelines Section 15064.5. The CRA Historic District is eligible for listing in the NRHP and CRHR under Criterion A/1 as a driving and enabling force for the economic development of Southern California and under Criterion C/3 as a marvel of civil engineering. Important features of this category include the design through numerous harsh environments in the desert landscape, extensive testing of materials (primarily concrete) necessary for construction in the desert, and the development of high efficiency pumping equipment. The CRA Historic District is also significant under Criterion D/4 for its potential to yield information about living and working conditions during the time of survey and construction. The district's character varies throughout its roughly 242-mile-long linear alignment. Within the Project site, the elements of the CRA Historic District consist of three roughly 900-foot-long pipeline segments including the CRA Casa Loma Siphon No. 1, CRA Casa Loma Siphon No. 2, and San Jacinto Pipeline (Abdo et al. 2025).

The purpose of the proposed Project is to protect two of the three pipelines in the Project site from flotation and erosion and to enhance their resilience against environmental factors. While the proposed Project includes modifications to the existing pipelines (for example, their encasement in concrete), the proposed Project does not include any elements that would result in physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings, such that its significance would be materially impaired. Following Project implementation, the CRA would retain the ability to convey its historical significance and would retain the character that justifies its inclusion in the CRHR and its eligibility for the NRHP (Abdo et al. 2025). Therefore, the proposed Project would not result in a substantial adverse change in the significance of the CRA as defined in CEQA Guidelines Section 15064.5(b)(1-2), and no impact would occur.

West Portal of the San Jacinto Tunnel of the CRA (P-33-07394)

Resource P-33-07394, the West Portal of the San Jacinto Tunnel of the CRA, consists of an irregular-in-plan concrete building/transition structure connecting the West Portal San Jacinto Tunnel and the CRA Casa Loma Siphon. The building is located on Soboba Road, approximately 0.11 mile north of the Project site. The structure is an element of the CRA Historic District (P-33-011265), which is recommended eligible for listing in the NRHP and CRHR. Therefore, the West Portal of the San Jacinto Tunnel qualifies as a historical resource under CEQA (Abdo et al. 2025).

The West Portal of the San Jacinto Tunnel of the CRA is outside the APE; therefore, no direct impacts would occur. Proposed Project elements would be buried belowground, consistent with current conditions, and the proposed Project would not introduce any permanent visual features that would diminish the integrity of the West Portal of the San Jacinto Tunnel of the CRA due to its distance from the Project site and the lack of aboveground components (Abdo et al. 2025). As such, no direct or indirect impacts to the West Portal of the San Jacinto Tunnel of the CRA would occur, and the proposed Project would not result in a substantial adverse change in the significance of the West Portal of the San Jacinto Tunnel of the CRA as defined in CEQA Guidelines Section 15064.5(b)(1-2). No impact would occur.

Cottonwood Grove (P-33-017364)

Resource P-33-017364, Cottonwood Grove, is a cottonwood tree grove that is of apparent traditional cultural value to local Luiseño tribal members, located along the north and south sides of the San Jacinto River approximately 0.25 mile east of the Project site. The grove has decreased to one-fifth of its original size in 1900 due to the agricultural use and the surrounding development of water conveyance infrastructure and residential areas. P-33-017364 was previously recommended as potentially eligible for listing in the NRHP and CRHR and is therefore considered a historical resource under CEQA as defined in CEQA Guidelines Section 15064.5 (Abdo et al. 2025).

The Cottonwood Grove is outside the APE; therefore, no direct impacts would occur. Proposed Project elements would be buried belowground, consistent with current conditions, and the Project would not introduce any permanent visual features that would diminish the integrity of the Cottonwood Grove due to its distance from the Project site and the lack of aboveground components (Abdo et al. 2025). As such, no direct or indirect impacts to the Cottonwood Tree Grove would occur, and the proposed Project would not result in a substantial adverse change in the significance of the Cottonwood Grove as defined in CEQA Guidelines Section 15064.5(b)(1-2). No impact would occur.

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

Less than Significant Impact. No, the proposed Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. No pre-contact or historic-period archaeological resources were identified within the

Project site through the cultural resources records search, background research, or field survey. Therefore, the proposed Project has no potential to impact known archaeological resources qualifying as historical resources or unique archaeological resources, as defined by CEQA. The geoarchaeological review indicates the Project site, located within and along the San Jacinto River channel, is underlain by Riverwash deposits of recent sands and gravels deposited within frequently-flooded drainageways, which have low to no potential to support intact archaeological deposits. The Project site has been subject to historic and modern disturbances associated with construction of the existing CRA components associated with the CRA Casa Loma Siphon No. 1, CRA Casa Loma Siphon No. 2, and San Jacinto Pipeline. Proposed Project work would take place within existing fill and overburden covering the existing pipelines and within the river where previous fill and riprap material have been previously deposited as part of prior pipeline stabilization efforts. Given these conditions, the potential for encountering archaeological resources is low (Abdo et al. 2025).

Nonetheless, although unlikely, unanticipated discoveries remain a possibility during ground disturbance. In accordance with Metropolitan standard practice outlined in Section 01065 of the construction contractor specifications (see Section 1.6.7, *Environmental Requirements for Construction*), if unanticipated archaeological resources are encountered during construction activities, the Project Contractor(s) would be required to cease all work immediately within 50 feet of a discovery, notify the Engineer, and protect the discovery area, as directed by the Engineer. The Engineer, with a qualified archaeologist, shall make a decision of validity of the discovery and designate an area surrounding the discovery as a restricted area until a qualified archaeologist can evaluate the discovery and recommend additional measures for proper handling and treatment. The Contractor shall not enter or work in the restricted area until the Engineer provides written authorization. As such, impacts to archaeological resources would be less than significant.

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

Less than Significant Impact. No, the proposed Project would not disturb human remains, including those interred outside of dedicated cemeteries. No human remains are known to be present within the Project site, and the Project site is highly disturbed from previous pipeline construction and maintenance and due to its location in an active riverbed channel (Abdo et al. 2025). In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. In accordance with Metropolitan standard practice outlined in Section 01065 of the construction contractor specifications (see Section 1.6.7, *Environmental Requirements for Construction*), Metropolitan would comply with California Health and Safety Code Section 7050.5, which states no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. If the human remains are determined to be of Native American origin, the Coroner will notify the NAHC, which will determine and notify a Most Likely Descendant. The Most Likely Descendant has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the Most Likely Descendant does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from subsequent disturbance. Adherence to California Health and Safety Code Section 7050.5 would result in the proper handling and treatment of unexpected human remains. Therefore, impacts to human remains would be less than significant.

3.6 Energy

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.

Discussion. Would the Project:

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

No Impact. No, the proposed Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources.

Energy use during the construction phase would be in the form of fuel consumption (e.g., gasoline and diesel fuel) to operate heavy equipment, light-duty vehicles, and machinery. Electrical power consumed to construct the proposed Project would be supplied from existing electrical infrastructure in the area and temporary grid power may also be provided to construction trailers or electric construction equipment. Energy use 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. The Project Contractor(s) would 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. The Project Contractor(s) would also be required to comply with applicable regulatory construction waste management practices to divert construction and demolition debris. Overall, these practices would reduce the potential for wasteful, inefficient, or unnecessary consumption of energy resources to occur during Project construction activities. After Project construction is complete, there would be no changes to Metropolitan's existing operation and maintenance activities at the Project site. Therefore, the proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, and no impact would occur.

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. In May 2022, Metropolitan adopted its Climate Action Plan (CAP), which includes measures for renewable energy and energy efficiency. None of these renewable energy and energy efficiency measures are applicable to the proposed Project. In addition, Metropolitan is not subject to the *County of Riverside Climate Action Plan Update*

(2019), and the entire Project site is within Metropolitan fee and easement property. Indirectly, on-road vehicles used during construction activities would be required to meet the ongoing federal and 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.

3.7 Geology and Soils

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.

Discussion. Would the Project:

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

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

ii) Strong seismic groundshaking?

Less than Significant Impact. No, the proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving the rupture of an earthquake fault mapped as part of an Alquist-Priolo Earthquake Fault Zone (APEFZ) or strong seismic groundshaking.

Like much of California, the Project site is located in a seismically active region. The United States Geological Survey defines active faults as those that have had surface displacement within the Holocene period (approximately the last 11,000 years). Potentially active faults are those that have had surface displacement during the last 1.6 million years, and inactive faults have not had surface displacement within that period. The Project site is located within a mapped APEFZ; the Claremont Fault runs northwest to southeast through the Project site (DOC 2025).

The proposed Project would encase the CRA Casa Loma Siphon No. 1 and the San Jacinto Pipeline to avoid pipeline flotation. Construction would not require excavation into bedrock or active fault zones. Because the Project does not introduce new habitable structures, permanent personnel, or expanded operational activities, it would not alter existing seismic conditions or increase the potential for fault rupture, seismic shaking, or ground failure in the region. The pipeline encasements are designed to improve structural integrity and reduce risks such as pipeline flotation without changing the geologic or seismic environment. 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 fault rupture or seismic groundshaking, and impacts would be less than significant.

a. *Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*
   iii) Seismic-related ground failure, including liquefaction?
   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 seismic-related ground failure, including liquefaction, and landslides. The Project site is not located within a mapped liquefaction zone or landslide hazard area (DOC 2025). The proposed Project would not include modifications to existing topography within the Project site that would have the potential to increase the risk of landslides or involve activities that could create a liquefaction hazard, such as shallow groundwater injection. Thus, the proposed Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death, as a result of seismic-related ground failure (including liquefaction) and landslides. No impact would occur.

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

Less than Significant Impact. No, the proposed Project would not result in substantial soil erosion or the loss of topsoil. The Project site was previously disturbed during the original construction of the CRA Casa Loma Siphon No. 1, CRA Casa Loma Siphon No. 2, and the San Jacinto Pipeline, as well as emergency activities conducted in 2019 and 2023 to keep the pipelines weighed down. The Project site primarily consists of gravel and sand associated with the San Jacinto River channel. In addition, the proposed Project would be subject to the requirements of the NPDES Construction General Permit (Order No. 2022-0057-DWQ) because the Project's area of disturbance (4.67 acres) would be greater than one acre. The Construction General Permit requires the development of a SWPPP to reduce erosion during construction activities. Compliance with the requirements set forth in this permit would require the Project Contractor(s) to implement best management practices during construction to prevent substantial soil erosion. Compliance with NPDES permit requirements would minimize the potential for Project construction to result in substantial soil erosion. Furthermore, there would be no changes to Metropolitan's existing operation and maintenance activities at the Project site. Thus, the proposed Project would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant.

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 or result in unstable geologic deposits or soils such that on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse would potentially occur. As discussed under thresholds 3.7(a)(iii) and (a)(iv), the Project site is not located within a landslide hazard area or liquefaction zone. The proposed Project would not include modifications to existing topography that could adversely affect soil stability or increase the potential for local or regional landslides, and the proposed Project does not include activities that would increase the potential for subsidence and collapse (such as oil extraction) or with the potential to result in lateral spreading and liquefaction (such as shallow groundwater injection). After Project construction is complete, there would be no changes to Metropolitan's existing operation and maintenance activities at the Project site. Thus, the proposed Project would not result in on- or off-site landslide, 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 soil, as defined in Section 1803.5.3 of the California Building Code (2010), creating substantial direct or indirect risks to life or property. According to the County of Riverside's General Plan, expansive soils are widely dispersed and can be found in hillside areas as well as low-lying alluvial basins (County of Riverside 2024a). The Project site contains soils composed of primarily Riverwash (RsC), with a small portion of Dello sandy loam (DgB) along the southern boundary (Natural Resources Conservation Service 2025). Due to the lack of clay content of the on-site soils, the potential for expansive soils to occur is low. In addition, the proposed Project involves encasement of the existing CRA Casa Loma Siphon No. 1 and the San Jacinto Pipeline and would not involve the addition of permanent on-site personnel or habitable structures to the Project site. Therefore, the proposed Project would have no potential to create substantial direct or indirect risks to life or property related to expansive soils, and 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 would not require the use or installation of septic tanks or alternative wastewater disposal systems. No impact would occur.

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 unique geologic features. Geoarchaeological research conducted for the proposed Project indicates Holocene-age Riverwash deposits of gravel, sand,

and clay of valley areas are present within the entire Project site (Abdo et al. 2025). The proposed Project site is located adjacent to and within an active river channel, which indicates continuous disturbances as a result of seasonal water flow activity of sands and gravels deposited within frequently-flooded drainageways, which have a low potential to support unique paleontological resources. Project construction activities would occur within soils that were previously disturbed during the original construction of the existing pipelines and decades of ongoing maintenance activities. Additionally, there are no unique geologic features within the Project site. In accordance with Metropolitan standard practice outlined in Section 01065 of the construction contractor specifications (see Section 1.6.7, *Environmental Requirements for Construction*), if unanticipated paleontological resources are discovered during construction activities, the Project Contractor(s) would be required to cease all work immediately within 50 feet of a discovery, notify the Engineer, and protect the discovery area, as directed by the Engineer. The Engineer, with the qualified paleontologist, shall decide validity of the discovery and designate an area surrounding the discovery as a restricted area. The Contractor shall not enter or work in the restricted area until the Engineer provides written authorization. Therefore, the proposed Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, and impacts would be less than significant.

3.8 Greenhouse Gas Emissions

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.

OVERVIEW OF CLIMATE CHANGE AND GREENHOUSE GASES

This section provides an analysis of proposed Project impacts on GHG emissions and is based in part on air pollutant and GHG emissions modeling conducted by Rincon, the results of which are included in Appendix B.

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 (CO_2), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Different types of GHGs have varying global warming potentials. 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 (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as "carbon dioxide equivalent" (CO_2e), which is the amount of GHG emitted multiplied by its global warming potential. Carbon dioxide has a 100-year global warming potential of one. By contrast, methane has a global warming potential of 30, meaning its global warming effect is 30 times greater than CO_2 on a molecule per molecule basis (Intergovernmental Panel on Climate Change [IPCC] 2021).[6]

Anthropogenic activities since the beginning of the industrial revolution (approximately 250 years ago) are adding to the natural greenhouse effect by increasing the concentration of GHGs in the atmosphere that trap heat. Since the late 1700s, estimated concentrations of CO_2, methane, and nitrous oxide in the atmosphere have increased by over 43 percent, 156 percent, and 17 percent, respectively, primarily due to human activity (USEPA 2025b). Emissions resulting from human activities are thereby contributing to an average increase in Earth's temperature. Potential climate change impacts in California may include loss of snowpack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years (State of California 2018).

[6] The IPCC's (2021) *Sixth Assessment Report* determined that methane has a GWP of 30. However, the 2022 Climate Change Scoping Plan published by the California Air Resources Board uses a GWP of 25 for methane, consistent with the IPCC's (2007) *Fourth Assessment Report*. Therefore, this analysis utilizes a GWP of 25.

REGULATORY FRAMEWORK

In May 2022, Metropolitan adopted a CAP and certified the associated Program EIR. The CAP sets targets for reducing GHG emissions from Metropolitan's operations, including the conveyance, storage, treatment, and delivery of water to its 26-member water agencies. The CAP informs policy and planning decisions and establishes a feasible and implementable way to reach its emissions reduction target. As outlined in Section 1.1 of Metropolitan's CAP, the CAP meets all the required elements of a qualified GHG emissions reduction plan and is in compliance with CEQA Guidelines Section 15183.5(b)(1) (Metropolitan 2022). Metropolitan used an emissions inventory and forecast to provide a basis for establishing targets for future GHG reductions. Metropolitan established a 2030 target of 40 percent below 1990 levels for GHG emissions reduction to achieve consistency with Senate Bill 32 and a 2045 target of carbon neutrality consistent with Assembly Bill 1279, which codifies the State's goal of achieving carbon neutrality by 2045 that was initially set forth in Executive Order B-55-18. Metropolitan is tracking its GHG emissions annually using a carbon budget approach. The carbon budget is analogous to a tank with a set capacity, or a total mass emission cap, between emissions level in 2005 and carbon neutrality in 2045. All the emissions from Metropolitan's operations go into this tank each year. The total capacity of the tank is Metropolitan's total emissions budget, and over time that tank fills up. As long as Metropolitan produces fewer GHG emissions than can fit in the tank, the identified targets will be achieved regardless of emissions produced during any particular year. Metropolitan's total carbon budget was calculated in Section 4.3 of the CAP and is based on the total emissions that can be generated between 2005 and 2045 while still achieving Metropolitan's 2030 and 2045 GHG emissions reduction targets (Metropolitan 2022). Additionally, Metropolitan is committed to preparing annual CAP progress reports to track GHG emissions against the carbon budget as well as a CAP update every five years to achieve carbon neutrality by 2045.

The CAP includes a suite of 42 GHG emissions reduction measures that would reduce Metropolitan's GHG emissions and achieve carbon neutrality while also providing improved infrastructure reliability, increased energy resiliency, and decreased costs associated with energy procurement and maintenance. GHG reduction measures included in the CAP include phasing out natural combustion, converting to a zero-emissions vehicle fleet, using alternative low-carbon intensity fuels, utilizing low-carbon and carbon-free electricity, improving energy efficiency, increasing waste diversion, and increasing water conservation and local water supplies (Metropolitan 2022).

METHODOLOGY

Similar to the air pollutant emissions modeling, GHG emissions associated with proposed construction activities were estimated using CalEEMod version 2022.1.1, generally in accordance with the methodology outlined in Section 3.3, *Air Quality*. GHG emissions associated with operation and maintenance activities were not modeled because the proposed Project would not result in changes to Metropolitan's existing operation and maintenance activities at the Project site. The primary difference in the GHG emissions modeling as compared to the air pollutant emissions modeling is that the 9.5-month construction scenario with work occurring separately on each pipeline was modeled in CalEEMod. This represents a conservative approach for GHG emissions analysis because emissions would be generated over a longer period of time under this scenario, resulting in higher total emissions, and GHG emissions are evaluated as a sum total instead of on a daily basis like the air quality analysis.

Discussion. Would the Project:

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

Less than Significant Impact. 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 2022). As a result, pursuant to CEQA Guidelines Section 15064.4, 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 Project is consistent with the adopted CAP. Therefore, this analysis relies on the streamlining provisions of CEQA Guidelines Section 15183.5 to determine whether the proposed Project would generate GHG emissions that may have a significant impact on the environment by evaluating whether the proposed Project would be consistent with the CAP. The proposed Project would be consistent with the CAP if the Project's emissions are within Metropolitan's carbon budget and the proposed Project incorporates all applicable reduction measures from the CAP.

Construction Activities

Construction of the proposed Project would result in temporary increases in GHG emissions as a result of the use of heavy-duty construction equipment and vehicle trips generated by construction workers and the transport of concrete, rebar, riprap, and soil. Estimated GHG emissions generated during Project construction are shown in Table 3.8-1. As shown therein, Project construction would generate approximately 330 metric tons (MT) of CO_2e.

Table 3.8-1. Estimated GHG Emissions – Project Construction (MT of CO_2e / year)

Year of Construction	Emissions (MT of CO_2e / year)
2026	15
2027	277
2028	38
Total Construction Emissions	**330**

Notes: MT = metric tons; CO_2e = carbon dioxide equivalent
Source: Appendix B

Operation and Maintenance Activities

Once construction is complete, there would be no changes to Metropolitan's existing operations and maintenance activities at the Project site. Therefore, no new operational GHG emissions would be generated.

Summary of Impacts

As noted previously, Metropolitan adopted a CAP to address and mitigate organization-wide GHG emissions associated with construction and operational activities. Metropolitan's 2024 CAP Annual Progress Report states approximately 9,108,078 MT of CO_2e remains in the carbon budget for the period 2024 through 2045 (Metropolitan 2025). The proposed Project would generate a total of approximately 330 MT of CO_2e (see Table 3.8-1), which is within the remaining quantified carbon budget as of 2024. Pursuant to the annual CAP GHG emissions inventory and reporting procedures, GHG emissions generated by proposed Project activities are 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 are being implemented to reduce Metropolitan's GHG emissions over time such that GHG emissions remain within the carbon budget.

As mentioned previously, the CAP includes a suite of measures to reduce GHG emissions. These measures include conducting studies, enacting administrative policies and Projects, upgrading fleet vehicles and deploying alternative fuel technologies, installing battery energy storage systems at specific treatment plants, increasing energy efficiency at pumping plants, incentivizing employees' use of low carbon transportation options, increasing waste diversion, promoting water use efficiency among Metropolitan's customers, and evaluating carbon sequestration opportunities. None of the CAP measures are applicable to the proposed Project, and implementation of the proposed Project would not conflict with GHG emissions reduction measures listed in the CAP.

In summary, the proposed Project's GHG emissions are within Metropolitan's carbon budget, and no CAP reduction measures are applicable to the proposed Project. Therefore, pursuant to CEQA Guidelines Sections 15064.4 and 15183.5, the proposed Project would not directly or indirectly generate GHG emissions that may have a significant impact on the environment, and the proposed Project would have a less than significant impact.

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. Applicable plans, policies, and regulations consist of Metropolitan's CAP, Senate Bill 32, Executive Order B-55-18, the 2022 Scoping Plan, and Assembly Bill 1279. As discussed under threshold 3.8(a), the proposed Project would be consistent with Metropolitan's CAP because 1) estimated GHG emissions generated by proposed Project activities are within Metropolitan's carbon budget and would be tracked as part of Metropolitan's overall carbon budget with organization-wide CAP measures implemented to reduce Metropolitan's GHG emissions over time such that GHG emissions remain within the carbon budget; and 2) the proposed Project would not conflict with the adopted CAP measures because none are applicable. 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, Senate Bill 32, Executive Order B-55-18, and Assembly Bill 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 any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions, and no impact would occur.

3.9 Hazards and Hazardous Materials

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.

Discussion. Would the Project:

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

Construction of the proposed Project would temporarily increase the transport and use of hazardous materials in the local vicinity of the Project site through the operation of heavy-duty vehicles and equipment. Such substances include diesel fuel, oil, solvents, and other similar materials brought onto the Project site for use and storage during the construction period. In accordance with Metropolitan standard practice outlined in Sections 01063 and 01065 of the construction contractor specifications (see Section 1.6.7, *Environmental Requirements for Construction*), the Project Contractor(s) would be required to store hazardous materials in covered, leak-proof containers when not in use, away from storm drains and heavy traffic areas; protect containers from rainfall infiltration; store hazardous materials separately from non-hazardous materials on a surface that prevents spills from permeating the ground surface, and in an area secure from unauthorized entry at all times; and store incompatible materials separately from each other. These materials would be disposed off site in accordance with applicable laws pertaining to the handling and disposal of hazardous waste. Furthermore, the Project Contractor(s) would be required to comply with all applicable federal, State, and local laws and regulations. These regulations and laws include the Hazardous Materials Transportation Act, California Hazardous Material Management Act, and California Code of Regulations Title 22. Operations and maintenance activities at the Project site, which do not currently involve the permanent storage of hazardous materials on site, would be similar to existing conditions once construction activities are completed. Therefore, the proposed Project would not create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials, and 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 noted under threshold 3.9(a), construction of the proposed Project would temporarily increase the transport and use of hazardous materials during routine construction activities that could cause an upset or accident. However, in accordance with Metropolitan standard practice outlined in Sections 01063 and 01065 of the construction contractor specifications (see Section 1.6.7, *Environmental Requirements for Construction*), standard best management practices, such as secondary containment and locating containers away from drainage areas, would be implemented, and hazardous materials would be stored away from the river in covered, leak-proof containers when not in use and protected from rainfall infiltration and ground permeation in the event of an accidental spill. Construction materials also would not be placed in areas where they could be washed into the San Jacinto River during a precipitation event, pursuant to Metropolitan standard practice. Furthermore, during construction, a temporary diversion structure consisting of earthen or water-filled berms, a series of pipelines, and appurtenant components would be installed within the bed and banks of the San Jacinto River to allow for diversion of surface water flows around the construction work area should a precipitation event occur, which would minimize the possibility of a hazardous materials spill entering the San Jacinto River. Operations and maintenance activities at the Project site, which do not currently involve the permanent storage of hazardous materials on site, would be similar to existing conditions once construction activities are completed. Therefore, the proposed Project would not 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, and 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 0.25 mile of an existing or proposed school. The nearest school, Mt. San Jacinto Community College, is located approximately one mile to the south of the Project site. Therefore, no impact related to emitting or handling hazardous materials, substances, or wastes within 0.25 mile of an existing or proposed school 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 or near a site found on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Based on a review of the Department of Toxic Substances Control's EnviroStor (2025) and the State Water Resources Control Board's GeoTracker (2025) databases, there are no hazardous materials sites within a mile of the Project site. Therefore, the proposed Project would not create a significant hazard to the public or the environment related to hazardous materials sites, and 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?

No Impact. No, the proposed Project would not result in a safety hazard or excessive noise for people residing or working in the Project Area due to proximity to a public airport or public use airport. The Project site is not located within two miles of a public airport or public use airport or within the jurisdiction of an airport land use plan. The nearest public use airport is the Hemet-Ryan Airport, located approximately 6.4 miles southwest of the Project site. Therefore, no impact would occur.

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

No Impact. No, the proposed Project would not impair implementation of or physically interfere with an adopted emergency plan or evacuation plan. The County of Riverside's Operational Area Emergency Operations Plan is the applicable emergency response plan for the vicinity of the Project site and provides guidance during unique situations requiring an unusual or extraordinary emergency response (County of Riverside 2024b). Implementation of the Operational Area Emergency Operations Plan involves coordination with all the facilities and personnel of County government, along with the jurisdictional resources of the cities and special districts within Riverside County, into an efficient organization capable of responding to an emergency. Although State Street and Soboba Road are identified as evacuation routes by the Western Riverside Council of Governments (Western Riverside Council of Governments 2025), Project construction would occur entirely within Metropolitan fee property and easements and would not temporarily obstruct or permanently alter these or other public roadways or existing access points in the vicinity of the Project site. Therefore, the proposed Project would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan. No impact would occur.

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, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

The Project site is located in a State Responsibility Area and a Very High Fire Hazard Severity Zone (California Department of Forestry and Fire Protection 2025). Construction of the proposed Project would include the use of heavy-duty equipment, which could pose a potential ignition risk. In accordance with PRC Section 4442, equipment including earth-moving and portable construction equipment with internal combustion engines would be equipped with spark arrestors to prevent the emission of flammable debris from exhaust, when operating on any forest-covered, brush-covered, or grass-covered land. In addition, PRC Sections 4427 and 4431 specify standards for conducting construction activities on days when a burning permit is required (i.e., during the State's declared fire season as well as when wildfire risk is otherwise high during the non-fire season), and PRC Section 4428 requires construction contractors to maintain fire suppression equipment during the highest fire danger period (April 1 to December 1) when operating on or near any forest-covered, brush-covered, or grass-covered land. These measures are designed to prevent accidental ignition and facilitate rapid response in the event of a fire. Furthermore, in accordance with Metropolitan standard practice outlined in Section 01065 of the construction contractor specifications (see Section 1.6.7, *Environmental Requirements for Construction*), gasoline-powered or diesel-powered machinery used during construction would be equipped with standard exhaust controls and muffling devices that also act as spark arrestors. After Project construction is complete, there would be no changes to Metropolitan's existing operation and maintenance activities at the Project site, and there would be no new permanent aboveground facilities or habitable structures within the Project site. Therefore, the proposed Project would have limited potential to expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires, and impacts would be less than significant.

3.10 Hydrology and Water Quality

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.

Discussion. Would the Project:

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 involve work within and near the San Jacinto River bed and thus would have the potential to introduce construction materials or wastes to the San Jacinto River, which would lead to water quality degradation. However, the proposed Project would be subject to the requirements of the NPDES Construction General Permit, which requires the development of a SWPPP. The SWPPP would include best management practices that minimize the migration of construction materials and sediment from the Project site into nearby receiving surface waters. In addition, Metropolitan would obtain a Clean Water Act Section 401 Water Quality Certification or Porter-Cologne Water Quality Control Act Waste Discharge Requirements from the Santa Ana RWQCB, which would include construction standards and measures to further reduce water quality impacts to the San Jacinto River. Furthermore, in accordance with

Metropolitan standard practice outlined in Sections 01063 and 01065 of the construction contractor specifications (see Section 1.6.7, *Environmental Requirements for Construction*), standard best management practices, such as secondary containment and locating containers away from drainage areas, would be implemented, and hazardous materials would be stored away from the river in covered, leak-proof containers when not in use and protected from rainfall infiltration and ground permeation in the event of an accidental spill. Construction materials also would not be placed in areas where they could be washed into the San Jacinto River during a precipitation event, pursuant to Metropolitan standard practice. Furthermore, during construction, a temporary diversion structure consisting of earthen or water-filled berms, a series of pipelines, and appurtenant components would be installed within the bed and banks of the San Jacinto River to allow for diversion of surface water flows around the construction work area should a precipitation event occur, which would minimize the possibility of construction materials, sediment, or hazardous materials entering the San Jacinto River.

If groundwater is encountered during construction activities, groundwater would be pumped out of the excavation area and discharged to the San Jacinto River riverbed pursuant to an applicable NPDES permit for discharges of groundwater, which Metropolitan would require the Project Contractor(s) to obtain. Groundwater is not expected to require treatment prior to discharge, and compliance with the applicable NPDES permit requirements would minimize the potential for groundwater discharge to degrade water quality of the San Jacinto River.

After Project construction is complete, there would be no changes to Metropolitan's existing operation and maintenance activities at the Project site, which do not involve activities with the potential to degrade water quality. Therefore, the proposed Project would not violate RWQCB water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality, and impacts 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?*

Less than Significant 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 Project site overlies the San Jacinto Groundwater Basin, which is managed by Eastern Municipal Water District (EMWD). The Groundwater Sustainability Plan for the San Jacinto Groundwater Basin was approved by the California Department of Water Resources in April 2023 (EMWD 2021).

Construction and operation of the proposed Project would not result in demand for groundwater supplies. The proposed Project would not add new impervious surfaces to the Project site. Groundwater dewatering during Project ground-disturbing activities may be necessary depending on depth to groundwater, although previous excavations at the Project site did not encounter groundwater. If groundwater is encountered during construction activities, groundwater would be pumped out of the excavation area and discharged to the San Jacinto River riverbed pursuant to an applicable NPDES permit for discharges of groundwater, which Metropolitan would require the Project Contractor(s) to obtain. Groundwater is not expected to require treatment prior to discharge. Therefore, 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, and impacts would be less than significant.

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?*

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. The proposed Project would temporarily divert the San Jacinto River during construction via earthen or water-filled berms, a series of pipelines, and appurtenant components, which would minimize the potential for a wash-out of the construction site during a precipitation event. If a precipitation event is forecasted that would cause flows to exceed the capacity of the diversion system, protective measures for the construction work, equipment, and Metropolitan's pipelines would be implemented. This system would be removed following the completion of construction, and the natural topography of the streambed would be restored to pre-project conditions. The proposed Project also would not add new impervious surfaces to the Project site. Furthermore, the proposed Project would be subject to the requirements of the NPDES Construction General Permit, which requires the development of a SWPPP, as well as a Clean Water Act Section 401 Water Quality Certification or Porter-Cologne Water Quality Control Act Waste Discharge Requirements. The SWPPP would include best management practices that would minimize the potential for erosion and sedimentation from the Project site. The Section 401 Water Quality Certification or Porter-Cologne Water Quality Control Act Waste Discharge Requirements would require project-specific best management practices and conditions that further prevent sediment discharge into waters of the State during construction activities. After Project construction is complete, there would be no changes to Metropolitan's existing operation and maintenance activities at the Project site, and the proposed Project would not result in new land uses that have the potential to generate substantial erosion or siltation. Therefore, impacts would be less than significant.

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:*
   ii) *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*

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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site. As discussed under threshold 3.10(c.i), the proposed Project would not introduce new impervious surfaces to the Project site but would temporarily divert the San Jacinto River during construction via earthen or water-filled berms, a series of pipelines, and appurtenant components, which would minimize the potential for a wash-out of the construction site during a precipitation event. If a precipitation event is forecasted that would cause flows to exceed the capacity of the diversion system, protective measures for the construction work, equipment, and Metropolitan's pipelines would be implemented. The temporary diversion system would re-route flows from upstream of the Project site to downstream of the Project site and would be designed in a manner that would avoid causing flooding on or off site. This system would be removed following the completion of construction, and the natural topography of the streambed would be restored to pre-project conditions. The proposed Project would be also subject to the requirements of the NPDES Construction General Permit, which requires the development of a SWPPP. The SWPPP would include best management practices that would minimize the potential for increased runoff from the Project site. After Project construction is complete, there would be no changes to Metropolitan's existing operation and maintenance activities at the Project site, and the proposed Project would not result in new land uses that have the potential to generate additional surface runoff beyond existing conditions. Therefore, impacts would be less than significant.

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:*

   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?*

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 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. As discussed under threshold 3.10(c.i), the proposed Project would not introduce new impervious surfaces to the Project site but would temporarily divert the San Jacinto River during construction via earthen or water-filled berms, a series of pipelines, and appurtenant components, which would minimize the potential for a wash-out of the construction site and the release of construction materials, sediment, and hazardous materials into the San Jacinto River during a precipitation event. Although construction would occur primarily during the dry season, which would minimize the potential for a precipitation event, if a precipitation event is forecasted that would cause flows to exceed the capacity of the diversion system, protective measures for the construction work, equipment, and Metropolitan's pipelines would be implemented. The temporary diversion system would re-route flows from upstream of the Project site to downstream of the Project site and would be designed in a manner that would avoid creating or contributing runoff water off site. This system would be removed following the completion of construction, and the natural topography of the streambed would be restored to pre-project conditions. The proposed Project would also be subject to the requirements of the NPDES Construction General Permit, which requires the development of a SWPPP. The SWPPP would include best management practices that would minimize the potential for runoff from the Project site. After Project construction is complete, there would be no changes to Metropolitan's existing operation and maintenance activities at the Project site, and the proposed Project would not result in new land uses that have the potential to generate additional and/or polluted runoff. Therefore, impacts would be less than significant.

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:*

   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 impede or redirect flood flows. As discussed under threshold 3.10(c.i), the proposed Project would not introduce new impervious surfaces to the Project site but would temporarily divert the San Jacinto River during construction via earthen or water-filled berms, a series of pipelines, and appurtenant components, which would minimize the potential for a wash-out of the construction site. Although construction would occur primarily during the dry season, which would minimize the potential for a precipitation event, if a precipitation event is forecasted that would cause flows to exceed the capacity of the diversion system, protective measures for the construction work, equipment, and Metropolitan's pipelines would be implemented. The temporary diversion system would re-route flows from upstream of the Project site to downstream of the Project site and would be designed in a manner that would avoid causing flooding on or off site. This system would be removed following the completion of construction, and the natural topography of the streambed would be restored to pre-project conditions such that the proposed Project would not result in a permanent alteration to the San Jacinto River's alignment and long-term flood behavior. The proposed Project also would not involve the installation of aboveground structures or facilities that could impede or redirect flood flows. Therefore, 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 result in the potential for pollutants to be released to the environment by inundation of the Project site during flood, tsunami, or seiche events. The Project site is located approximately 48 miles east of the Pacific Ocean; therefore, it is not located in a tsunami zone. A seiche is a standing wave oscillating in a body of water. The nearest body of water capable of seiche, Diamond Valley Lake, is approximately 8.3 miles southwest of the Project site, and intervening topography would minimize the potential for a seiche to inundate the Project site.

The Project site is located within Zone AE, defined as an area subject to a one percent annual chance of flooding (100-year floodplain) (Federal Emergency Management Agency 2018). In accordance with Metropolitan standard practice outlined in Sections 01063 and 01065 of the construction contractor specifications (see Section 1.6.7, *Environmental Requirements for Construction*), standard best management practices, such as secondary containment and locating containers away from drainage areas, would be implemented, and hazardous materials would be stored away from the river in covered, leak-proof containers when not in use and protected from rainfall infiltration and ground permeation in the event of an accidental spill. Furthermore, during construction, a temporary diversion structure consisting of earthen or water-filled berms, a series of pipelines, and appurtenant components would be installed within the bed and banks of the San Jacinto River to allow for diversion of surface water flows around the construction work area should a precipitation event occur, which would minimize the possibility of construction materials, sediment, or hazardous materials entering the San Jacinto River during a flood event. Although construction would occur primarily during the dry season, if a precipitation event would cause flows to exceed the capacity of the diversion system, additional protective measures for the construction work, equipment, and Metropolitan's pipelines would be implemented, which would further minimize the risk of release of pollutants. After Project construction is complete, there would be no changes to Metropolitan's existing operation and maintenance activities at the Project site, which do not currently involve the storage of hazardous materials or other potential pollutant sources at the Project site. Therefore, the potential for the proposed Project to risk the release of pollutants due to inundation during a flood event is low, and impacts would be less than significant.

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

No Impact. No, the proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Applicable plans include the Groundwater Sustainability Plan for the San Jacinto Groundwater Basin (Eastern Municipal Water District 2021), as well as the Water Quality Control Plan for the Santa Ana River Basin (Santa Ana RWQCB 2025), which includes the San Jacinto River watershed.

As discussed under threshold 3.10(a), the proposed Project has a low potential for surface water degradation due to installation of a temporary diversion structure within the San Jacinto River bed during construction, implementation of a SWPPP and compliance with the best management practices outlined in the SWPPP and Section 401 Water Quality Certification or Porter-Cologne Water Quality Control Act Waste Discharge Requirements designed to minimize the off-site migration of sediment and construction materials into the San Jacinto River, adherence to Metropolitan's standard best practices for hazardous materials containment, and adherence to applicable NPDES permit requirements for groundwater discharge. As discussed under threshold 3.10(b), the proposed Project would not introduce a new permanent demand for groundwater, construction dewatering would be conducted in accordance with applicable NPDES permit requirements, and the proposed Project would not add new impervious surfaces to the Project site. Thus, the proposed Project would not have the potential to conflict with the Water Quality Control Plan for the Santa Ana River Basin or the Groundwater Sustainability Plan for the San Jacinto Groundwater Basin. No impact would occur.

3.11 Land Use and Planning

LAND USE 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.

Discussion. Would the Project:

a. Physically divide an established community?

No Impact. No, the proposed Project would not physically divide an established community. The proposed Project involves the encasement of existing underground pipelines entirely within Metropolitan fee property and easements. The Project site does not serve as a means of moving through or connecting a community or neighborhood. No new permanent aboveground facilities or structures would be constructed as part of the proposed Project, and no existing roadways that provide access within the local vicinity (e.g., Soboba Road, State Street) would be altered. Therefore, the proposed Project would not physically divide an existing community, and 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 Project site is located on Metropolitan fee property and easements in unincorporated Riverside County. The Project site has Riverside County General Plan land use designations of Open Space-Recreation and Open Space-Water and is zoned as W-2-10 (County of Riverside 2025a). No General Plan land use amendment or zone change is proposed, and upon completion of construction activities, the Project site would remain in its current use. Pursuant to California Government Code Section 53091, building and zoning ordinances of a county or city do not apply to the location or construction of facilities for the production, storage, or transmission of water, wastewater, or electrical energy by a local agency. Operations and maintenance activities at the Project site would be similar to existing conditions once construction is complete. Therefore, 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. No impact would occur.

3.12 Mineral Resources

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.

Discussion. Would the Project:

a. *Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?*

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 known mineral resource that would be of value to the region and the residents of the State or 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 mineral recovery is currently occurring at the Project site, and the Project site and surrounding properties are not designated or zoned for mineral resource extraction (County of Riverside 2021a). The proposed Project would not result in changes to the current land use of the Project site. Therefore, the proposed Project would result in no impacts to mineral resources.

3.13 Noise

NOISE Would the Project result in:	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.

OVERVIEW OF NOISE AND VIBRATION

Noise

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

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, ground-borne vibration generated by manmade activities attenuates rapidly as distance from the source of the vibration increases. 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 2020a). 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 Federal Transit Administration (FTA) to avoid structural damage to buildings.

Table 3.13-1. FTA Groundborne Vibration Criteria for Architectural Damage

Building Category	Vibration Level (in/sec PPV)
I. Reinforced concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

Notes: in/sec (inches per second), PPV (peak particle velocity).
Source: FTA 2018

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 2020a

REGULATORY FRAMEWORK

Chapter 9.52 of the Riverside County Code regulates noise in the unincorporated areas of Riverside County and notes that no person shall create any sound, or allow the creation of any sound, on any property that causes the exterior sound level on any other occupied property to exceed the sound level standards set forth by the County. Section 9.52.020(A-C) exempts facilities owned or operated by or for a governmental agency, capital improvement projects of a governmental agency, and the maintenance or repair of public properties from compliance with Chapter 9.52.

Discussion. Would the Project result in:

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. No, the proposed Project would not generate a substantial temporary or permanent increase in ambient noise levels in excess of applicable standards.

Construction Activities

Pursuant to Riverside County Code Section 9.52.020(A-C), Metropolitan's facilities, capital improvement projects, and maintenance and repair activities are exempt from compliance with the sound level standards in the County's noise ordinance because Metropolitan is a governmental agency. Therefore, construction noise associated with the proposed Project would be exempt from the County's noise regulations. Furthermore, noise from construction activities would quickly attenuate with distance from the equipment and would not substantially increase the ambient noise level at the nearest residence due to the large distance between this residence and the Project site, which is located approximately 0.2 mile west of the nearest limit of work boundary associated with the proposed Project. Lastly, in accordance with Metropolitan standard practice outlined in Section 01065 of the construction contractor specifications (see Section 1.6.7, *Environmental Requirements for Construction*), the Project Contractor(s) would be required to implement several noise reduction measures including maintaining all construction vehicle equipment in proper working order for the duration of the construction activities, equipping all construction equipment with properly operating and maintained noise mufflers and intake silencers, and covering or locating all stationary noise-generating equipment, such as generators and compressors, as far as practicable from the nearest residential and institutional property lines. Therefore, Project construction would not generate a substantial temporary increase in ambient noise levels in the vicinity of the Project site in excess of standards established in a local general plan or noise ordinance, or applicable standards of other agencies. Impacts would be less than significant.

Operation and Maintenance Activities

After Project construction is complete, there would be no changes to Metropolitan's existing operation and maintenance activities at the Project site. Therefore, Project operation and maintenance would not generate a substantial permanent increase in ambient noise levels in the vicinity of the Project site in excess of standards established in a local general plan or noise ordinance, or applicable standards of other agencies. No impact would occur.

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 noise levels.

Construction Activities

During construction, the use of heavy-duty equipment, such as excavators and graders, for sitework and earthmoving activities would generate groundborne vibration at the Project site and in the immediate vicinity. However, groundborne vibration levels resulting from construction activities would quickly diminish with distance from the source. Vibration-generating construction activities would occur approximately 1,075 feet from the nearest residential structure. At this distance, vibration levels would be well below the thresholds for building damage recommended by the FTA and the thresholds for annoyance recommended by Caltrans. Therefore, Project construction activities would not generate excessive groundborne vibration or noise levels at the nearest sensitive receptors, and impacts would be less than significant.

Operation and Maintenance Activities

After Project construction is complete, there would be no changes to Metropolitan's existing operation and maintenance activities at the Project site, which do not currently involve the use of vibration-generating equipment. Groundborne vibration and noise impacts would be less than significant. Therefore, Project operation and maintenance would not generate excessive groundborne vibration or groundborne noise levels, and no impact would occur.

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 working in the Project area to excessive noise levels. The Project site is not located within two miles of a public airport, public use airport, or private airstrip or within the jurisdiction of an airport land use plan. The nearest public use airport is the Hemet-Ryan Airport, located approximately 6.4 miles southwest of the Project site. Therefore, no impact would occur.

3.14 Population and Housing

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.

Discussion. Would the Project:

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

No Impact. No, the proposed Project would not directly or indirectly induce substantial unplanned growth in the Project area. The proposed Project does not propose the construction of new homes and thus would not directly induce population growth in Riverside County. The proposed Project does not include construction of new water supply facilities or expansion of existing facilities and therefore would not increase water supply to the region or otherwise indirectly induce population growth. Operations and maintenance activities at the Project site would remain similar to existing conditions once construction activities are completed and would not require additional Metropolitan employees. Therefore, 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 Project site does not contain housing, and the proposed Project would not change the existing land use of the Project site. As such, the proposed Project would not displace any people or housing, and no impact would occur.

3.15 Public Services

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.

Discussion.

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 nearest governmental facilities to the Project site are Riverside County Fire Department Station 25 (located 2.3 miles to the south), the San Jacinto Police Department (located 2.7 miles to the south), Mt. San Jacinto Community College (located 1.0 mile to the south), Sagecrest Park (located 0.8 mile to the southwest), and the San Jacinto Public Library (located 2.6 mile to the southeast). As discussed in Section 3.14, *Population and Housing,* the proposed Project would not directly or indirectly induce population growth or require additional Metropolitan employees for operation and maintenance and thus would not increase demand for fire protection services, police protection services, schools, parks, or other public facilities. Therefore, 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

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.

Discussion.

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. The Project site is located entirely within Metropolitan's fee property and easements, and the nearest park to the Project site is Sagecrest Park, located approximately 0.8 mile to the southwest. In addition, the City of San Jacinto's planned San Jacinto River Park is located immediately south of the Project site. As discussed in Section 3.14, *Population and Housing,* the proposed Project would not directly or indirectly induce population growth or require additional Metropolitan employees for operation and maintenance in a manner that would increase the use of existing neighborhood and regional parks or other recreational facilities. Therefore, 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, and no impact would occur to such facilities.

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 does not include recreational facilities or require the construction or expansion of recreational facilities. As such, no impact would occur.

3.17 Transportation

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

Significance criteria established by CEQA Guidelines, Appendix G.

Discussion. Would the Project:

a. *Conflict with a program, 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 program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The Project site is located in unincorporated Riverside County, in close proximity to the city of San Jacinto. The County of Riverside's General Plan Circulation Element (2024c), County of Riverside's San Jacinto Valley Area Plan (2021), City of San Jacinto's General Plan (2025a), City of San Jacinto's Trails Master Plan (2025b), and SCAG's 2024-2045 Regional Transportation Plan/Sustainable Communities Strategy (SCAG 2024) identify goals and policies for the circulation system in the vicinity of the Project site. During Project construction, vehicles would access the Project site from SR 79, before traveling north on State Street and east on Soboba Road. An existing access road leading from Soboba Road, as well as a new unpaved access road, would provide direct access into the Project site. There are no pedestrian facilities (sidewalks) or bicycle lanes along Soboba Road in the vicinity of the Project site. The City of San Jacinto's Trails Master Plan (2025b) identifies a planned regional trail south of the Project site. Construction staging would occur south of Soboba Road, to the west and east of existing access roads, and would not interfere with circulation along this roadway. Neither construction nor operation of the proposed Project would require modifications to public roadways or circulation infrastructure. Project construction would require the temporary use of heavy equipment and a limited number of construction worker trips during weekday daytime hours. These activities would represent a minor and short-term addition to existing traffic volumes and would not result in long-term increases in traffic. Upon the completion of construction, there would be no changes to Metropolitan's existing operation and maintenance activities at the Project site, and no aboveground structures or facilities would be installed that could interfere with the City of San Jacinto's planned regional trail. Therefore, the proposed Project would not conflict with applicable programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, or pedestrian facilities, 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 with or be inconsistent with CEQA Guidelines Section 15064.3(b). Neither the Governor's Office of Land Use and Climate Innovation nor any jurisdiction in the local area requires an evaluation of vehicle miles traveled (VMT) impacts during construction (County of Riverside 2020). Caltrans' (2020b) *Transportation Analysis under CEQA, First Edition* guidance document indicates that a construction VMT analysis is typically only necessary for large projects or projects located a considerable distance from urbanized areas. The guidance also states that vehicle trips related to construction activities are temporary and the associated VMT is generally minor and limited to construction equipment and personnel with no long-term trip generation. The Project site is close to urbanized areas, and the proposed Project would not involve large-scale construction activities that would have the potential to result in substantial increases in regional VMT because 1) construction workers and materials would be primarily sourced locally and 2) a relatively low volume of daily truck trips is anticipated. In addition, the proposed Project would not require lane closures that could result in out-of-direction travel as travelers attempt to avoid the construction area. Therefore, based on the Caltrans guidance, the proposed Project would not generate substantial VMT during construction. After Project construction is complete, there would be no changes to Metropolitan's existing operation and maintenance activities at the Project site. Therefore, the proposed Project would not conflict with or be inconsistent with CEQA Guidelines Section 15064.3(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 substantially increase hazards due to a geometric design feature or incompatible uses. The Project site would be accessed via SR 79, State Street, and Soboba Road during construction activities. The proposed Project would not result in temporary or permanent alterations to these roadways, changes to existing geometric design, or creation of incompatible uses along these roadways. Upon the completion of construction, there would be no changes to Metropolitan's existing operation and maintenance activities at the Project site. Therefore, no impact would occur.

d. Result in inadequate emergency access?

No Impact. No, the proposed Project would not result in inadequate emergency access. The Project site would be accessed via major regional routes (SR 79) and local roads (State Street and Soboba Road) during construction activities. Project-related vehicles and equipment would be parked off of public roads and would not block emergency access routes, and no road or lane closures are proposed. Additionally, in accordance with Metropolitan standard practice outlined in Section 01065 of the construction contractor specifications (see Section 1.6.7, *Environmental Requirements for Construction*), the Construction Contractor(s) would prepare a Traffic Control Plan that would include provisions to ensure that emergency vehicles can access the area without delay or interference. As a result, the proposed Project would not result in inadequate emergency access, and no impact would occur.

3.18 Tribal Cultural Resources

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?	☐	☒	☐	☐

Significance criteria established by CEQA Guidelines, Appendix G.

Discussion. Would the Project:

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)?*

Less Than Significant Impact. Metropolitan sent letters dated June 23, 2025, via certified mail to two Native American tribes (Soboba Band of Luiseño Indians and Pechanga Band of Luiseño Indians) 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. One tribe, the Soboba Band of Luiseño Indians, requested consultation. A consultation meeting took place on August 28, 2025. During the consultation meeting, the Soboba Tribal Historic Preservation Officer, Joseph Ontiveros, expressed concerns that the proposed Project is located in an area considered sensitive by the Soboba and has spiritual significance to the tribe. Mr. Ontiveros described the tribal use of the proposed Project area and local vicinity, and the importance of the geographic features within and surrounding the proposed Project area that may be sensitive for unidentified tribal cultural resources and burials, and described that the proposed Project area has a Luiseño place name. Mr. Ontiveros proposed measures to avoid or minimize effects to Tribal Cultural Resources. Metropolitan's cultural resource and archaeological resource identification efforts did not identify the presence of a resource eligible for or listed on the CRHR or local register within the proposed Project area except for the CRA itself, which is eligible for the CRHR as a historic district. Because no tribal cultural resource eligible for the CRHR or a local register of historical resources was identified within or adjacent to the proposed Project area, impacts would be less than significant.

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?

Less Than Significant Impact with Mitigation Incorporated. As described above, Metropolitan conducted tribal cultural resource consultation with the Soboba Band of Luiseño Indians. Although no cultural resources eligible for the CRHR or a local register of historical resources are known to be present within the proposed Project area, except for the CRA, the area is known to be sensitive for prehistoric archaeological resources and has been used or occupied by native peoples prior to European contact. During consultation, Mr. Ontiveros, the Soboba Tribal Historic Preservation Officer, recommended the implementation of a Tribal Cultural Resource Management Plan as a mitigation measure, detailing processes and procedures for unanticipated tribal cultural resource discoveries during Project-related ground-disturbing activities and procedures for the unanticipated discovery of human remains and burials. Therefore, Metropolitan would implement Mitigation Measure TCR-1, which includes preparation and implementation of a Tribal Cultural Resource Management Plan in coordination with the Soboba Band of Luiseño Indians to reduce potential direct and indirect impacts to tribal cultural resources to less-than-significant levels.

MITIGATION MEASURES

TCR-1 Tribal Cultural Resource Management Plan

Metropolitan shall prepare a Tribal Cultural Resources Management Plan in coordination with the Soboba Band of Luiseño Indians prior to Project construction. The plan shall include a description of Project construction activities that shall require tribal monitoring. The plan shall also include detailed processes and procedures for unanticipated tribal cultural resource discoveries during Project ground-disturbing activities and procedures for the unanticipated discovery of human remains and burials. The provisions of the Tribal Cultural Resources Management Plan shall be implemented during Project construction, and any monitoring logs/reports shall be submitted to Metropolitan.

3.19 Utilities and Service Systems

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.

Discussion. Would the Project:

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 water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities. The proposed Project itself involves structural improvements to the existing CRA Casa Loma Siphon No. 1 and San Jacinto Pipeline, including subsurface concrete encasement reinforced with steel rebar and erosion control measures, such as riprap. The proposed Project does not include construction of new water supply facilities or expansion of existing water supply facilities, and no increase in wastewater generation at the Project site would occur. In addition, the proposed Project would not require electric power, natural gas connections, or telecommunications infrastructure and would not permanently alter stormwater drainage patterns within the Project site. Therefore, the proposed Project would not require or result in the relocation or construction of new or expanded utility facilities, and no impact would occur.

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

Less than Significant Impact. Yes, there would be sufficient water supplies available to serve the proposed Project. Project construction activities may temporarily require water supplies for controlling dust and irrigating any hydroseeded areas installed during site restoration. EMWD, one of Metropolitan's member agencies, is the retail water provider for the Project site vicinity. Water for dust suppression and irrigation would be transported to the Project site via a mobile water truck, and this usage would be minimal and temporary. After Project construction is complete, there would be no changes to Metropolitan's existing operation and maintenance activities at the Project site, and Metropolitan would continue to convey water supplies through the CRA Casa Loma Siphon No. 1 and San Jacinto Pipeline to its service area, as under existing conditions. Therefore, there would be sufficient water supplies available to serve the proposed Project, and impacts to water supplies would be less than significant.

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. The proposed Project would not require wastewater treatment and thus would not need a determination by a wastewater treatment provider that it has adequate capacity to serve the proposed Project. Therefore, 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, or otherwise impair the attainment of solid waste reduction goals. Construction activities would temporarily generate solid waste, including soil spoils and other construction waste that would be disposed of at the Lamb Canyon Sanitary Landfill approximately 4.7 miles northwest of the Project site, or at another nearby landfill. The Lamb Canyon Sanitary Landfill has a maximum permitted throughput of 5,000 tons per day. As of 2020, the Lamb Canyon Sanitary Landfill had approximately 14.5 million cubic yards remaining of its total capacity of 39.7 million cubic yards and is expected to continue operations through 2032 (California Department of Resources Recycling and Recovery 2025). According to the Riverside County Integrated Waste Management Plan 2023 Five-Year Review Report and the 2023 Riverside-Unincorporated Electronic Annual Report summary, a shortfall in permitted landfill capacity within Riverside County is not anticipated to occur in the next 15 years or more (California Department of Resources and Recycling Recovery 2023 and 2024). Furthermore, after Project construction is complete, there would be no changes to Metropolitan's existing operation and maintenance activities at the Project site, which currently do not generate solid waste routinely. Given that waste would only be temporarily generated by the proposed Project during the construction period and the existing availability of landfill capacity at the Lamb Canyon Sanitary Landfill, the proposed Project would have low potential to 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. Therefore, impacts would be less than significant.

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

No Impact. Yes, the proposed Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Project construction activities would temporarily generate solid waste, including soil spoils and other construction waste. Project Contractor(s) would be required to comply with federal, state, and local statutes and regulations related to solid waste. Therefore, no impact would occur.

3.20 Wildfire

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.

The Project site is in a Very High Fire Hazard Severity Zone in a State Responsibility Area (California Department of Forestry and Fire Protection 2025).

<u>Discussion</u>. *If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, would the Project:*

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

Less than Significant Impact. No, the proposed Project would not substantially impair an adopted emergency response plan or emergency evacuation plan. The County of Riverside's Operational Area Emergency Operations Plan is the applicable emergency response plan for the vicinity of the Project site and provides guidance during unique situations requiring an unusual or extraordinary emergency response (County of Riverside 2024b). Implementation of the Operational Area Emergency Operations Plan involves coordination with all the facilities and personnel of County government, along with the jurisdictional resources of the cities and special districts within Riverside County, into an efficient organization capable of responding to an emergency. The proposed Project involves concrete encasement and installation of riprap protection for two underground pipelines entirely within Metropolitan fee property and easements and would not temporarily obstruct or permanently alter public roadways or existing access points in the vicinity of the Project site. In addition, although State Street and Soboba Road are identified as evacuation routes, the proposed Project does not involve road closures or changes to public access routes. In accordance with Metropolitan standard practice outlined in Section 01065 of the construction contractor specifications (see Section 1.6.7, *Environmental Requirements for Construction*), a Traffic Control Plan would be prepared and would ensure continued emergency access along the adjacent routes during construction. Therefore, although the Project site is in a Very High Fire Hazard Severity Zone in a State Responsibility Area, impacts would be less than significant.

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?*

Less than Significant Impact. No, the proposed Project would not expose occupants to pollutant concentrations from a wildfire or exacerbate wildfire risks. Although the Project site is in a Very High Fire Hazard Severity Zone in a State Responsibility Area, the Project site consists of the riverbed of the San Jacinto River and adjacent vegetated open space areas (including the riverbanks) characterized by gentle slopes and low topographic relief surrounded by moderate hillside slopes. Based on topographic interpretation and United States Geological Survey mapping, the site does not contain steep slopes that would facilitate rapid fire spread (United States Geological Survey 2021). Meteorological data for the San Jacinto area indicate that prevailing winds generally flow from the southwest to west-southwest at 5 to 10 miles per hour, which could carry smoke or embers in the event of a wildfire (National Weather Service 2025). While these wind patterns could influence the spread of smoke or embers during a wildfire, they do not inherently increase the likelihood of wildfire ignition or occurrence during construction or operation of the Project.

Construction of the proposed Project would include the use of heavy-duty equipment, which could pose a potential ignition risk. In accordance with PRC Section 4442, equipment including earth-moving and portable construction equipment with internal combustion engines would be equipped with spark arrestors to prevent the emission of flammable debris from exhaust, when operating on any forest-covered, brush-covered, or grass-covered land. In addition, PRC Sections 4427 and 4431 specify standards for conducting construction activities on days when a burning permit is required, and PRC Section 4428 requires construction contractors to maintain fire suppression equipment during the highest fire danger period (April 1 to December 1) when operating on or near any forest-covered, brush-covered, or grass-covered land. These measures are designed to prevent accidental ignition and facilitate rapid response in the event of a fire. Furthermore, in accordance with Metropolitan standard practice outlined in Section 01065 of the construction contractor specifications (see Section 1.6.7, *Environmental Requirements for Construction*), gasoline-powered or diesel-powered machinery used during construction would be equipped with standard exhaust controls and muffling devices that also act as spark arrestors. Upon the completion of construction, there would be no new aboveground structures or facilities, no new permanent on-site personnel, and no changes to Metropolitan's existing operation and maintenance activities at the Project site. Therefore, the proposed Project would not expose occupants to pollutant concentrations from a wildfire or exacerbate wildfire risks, and impacts would be less than significant.

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?*

No Impact. No, the proposed Project would not require the installation or maintenance of infrastructure such as roads, fuel breaks, emergency water sources, power lines, or other utilities that could exacerbate fire risk or result in temporary or ongoing environmental impacts. Therefore, no impact would occur.

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?*

Less than Significant Impact. No, the proposed Project would not 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 patterns. Although the Project site is in a Very High Fire Hazard Severity Zone in a State Responsibility Area and is surrounded by moderate slopes, the Project site is uninhabited and does not contain any structures that would be exposed to increased risk from wildfire. The proposed Project involves subsurface encasement of existing pipelines and would not introduce new aboveground infrastructure or alter existing drainage patterns. The proposed Project also includes installation of erosion control measures such as riprap and geotextile fabric to stabilize soils and maintain drainage. The proposed Project is designed to improve the structural integrity of existing infrastructure and would not increase the potential for post-fire slope instability or related hazards. Therefore, impacts would be less than significant.

3.21 Mandatory Findings of Significance

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.

<u>*Discussion*</u>:

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

Less Than Significant with Mitigation Incorporated. No, the proposed Project would not substantially degrade or impact biological resources or eliminate important examples of the major periods 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-7 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*, the proposed Project would not cause a substantial adverse change in the significance of a historical resource or of an archaeological resource, and impacts would be less than significant. 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.

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. No, the proposed Project does not have impacts that are individually limited, but cumulatively considerable. Based on the analysis contained in this IS-MND, the proposed Project would not result in significant and unmitigable impacts to environmental resource areas. In all cases, impacts associated with the proposed Project would be limited to the Project site or are of such a negligible degree that they would not result in a significant contribution to any cumulative impacts. This is largely due to the fact that Project construction activities would be temporary, and after construction is completed, there would be no changes to Metropolitan's existing operation and maintenance activities at the Project site.

Cumulative impacts could occur if the construction of other projects occurs at the same time as the proposed Project and in the same geographic scope, such that the effects of similar impacts of multiple projects combine to create greater levels of impact than would occur at the project level. For example, if the construction of other projects in the area occurs at the same time as construction activities associated with the proposed Project, combined noise and transportation impacts may be greater than at the project level. However, the Project site is within a non-urbanized area within Metropolitan fee property and easements. Given that the Project site is located more than 1,000 feet from the nearest residences and communities, and there are no planned projects in the vicinity of the Project site (County of Riverside 2024d and 2025b), the proposed Project's impacts during construction would not combine with the impacts of other projects to create cumulative construction activity-related impacts in areas such as air quality, noise, and transportation. Furthermore, upon completion, the proposed Project would have no operational impacts that could combine with the impacts of other projects to create cumulative impacts because there would be no changes to Metropolitan's existing operation and maintenance activities at the Project site. For these reasons, the incremental effects of the proposed Project would not be considerable when viewed in connection with the effects of past projects, current projects, or probable future projects, and cumulative impacts would be less than significant.

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

Less than Significant Impact. Based on the analysis contained in this IS-MND, the proposed Project does not exceed any significance thresholds or result in significant impacts in the environmental categories typically associated with indirect or direct effects to human beings, such as aesthetics, air quality, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, public services, transportation, or wildfire. As discussed in Section 3.1, *Aesthetics*, Section 3.3, *Air Quality*, Section 3.7, *Geology and Soils*, Section 3.9, *Hazards and Hazardous Materials*, Section 3.10, *Hydrology and Water Quality*, Section 3.13, *Noise*, Section 3.15, *Public Services*, Section 3.17, *Transportation*, and Section 3.20, *Wildfire*, of this document, the proposed Project would not expose persons to the hazards of toxic air emissions, chemical or explosive materials, groundshaking, flooding, noise, transportation, or wildfire. For these reasons, the proposed Project does not have a Mandatory Finding of Significance due to environmental effects that could cause substantial adverse effects on humans.

4. List of Acronyms

APEFZ	Alquist-Priolo Earthquake Fault Zone
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CAP	Climate Action Plan
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
CHRIS	California Historical Resources Information System
CNDDB	California Natural Diversity Data Base
CRA	Colorado River Aqueduct
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalents
DOC	California Department of Conservation
DPM	diesel particulate matter
dB	decibel
dBA	A-weighted decibel
EIR	environmental impact report
EMWD	Eastern Municipal Water District
FTA	Federal Transit Administration
GHG	greenhouse gas
in/sec	inches per second
IPCC	Intergovernmental Panel on Climate Change
IS-MND	Initial Study-Mitigated Negative Declaration
Metropolitan	The Metropolitan Water District of Southern California
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
PM_{10}	particulate matter with diameters of 10 microns or less
$PM_{2.5}$	particulate matter with diameters of 2.5 microns or less
PPV	peak particle velocity
PRC	California Public Resources Code
Rincon	Rincon Consultants, Inc.

RMS	root mean square
ROG	reactive organic gases
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCIC	South Coast Information Center
SLF	Sacred Lands File
SR	State Route
SSC	California Species of Special Concern
SWPPP	Stormwater Pollution Prevention Plan
TAC	toxic air contaminants
USEPA	United States Environmental Protection Agency
VOC	volatile organic compounds

5. List of Preparers

5.1 The Metropolitan Water District of Southern California

- Jennifer Harriger, Manager, Environmental Planning Section
- Sean Carlson, Team Manager, Environmental Planning Section
- Michelle Morrison, Senior Environmental Specialist, Environmental Planning Section
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- Jennifer Jacobus, PhD, Principal
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- Annaliese Torres, Supervising Environmental Planner
- Kholood Abdo, Senior Supervising Cultural Resources Specialist
- Andrea Maben, Senior Biologist
- Bill Vosti, Program Manager – Air Quality, GHG Emissions, and Noise
- Nicholas Carter, Environmental Planner
- Ryan Perry, Environmental Planner
- Lucas Carneiro, Air Quality and Greenhouse Gas Specialist
- Kyle Pritchard, Noise Specialist

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