THREE VALLEYS MUNICIPAL WATER DISTRICT
REGULAR BOARD MEETING AGENDA

1021 E. Miramar Avenue, Claremont, CA 91711
November 3, 2021 – 8:00 AM

SPECIAL NOTICE OF TELECONFERENCE ACCESSIBILITY

Pursuant to the provisions of Assembly Bill 361, and in response to the COVID-19 outbreak and as a precaution to our Board of Directors, staff and the public, Three Valleys MWD will hold its Board meeting via teleconference. The public's physical attendance at the District is not allowed. The public may participate in the teleconference by clicking on the link below:

https://tvmwd.zoom.us/webinar/register/WN_Xty9L_IUQIiXuAXTrC4Y0A
(Dial-in instructions are provided after registering at the link above)

Any member of the public wishing to participate in public comment may do so in any of the following manners: (1) when prompted by the President during the public comment period, (2) by filling out the electronic speaker's card at the following link https://arcg.is/0z5GqO prior to the close of public comment, or (3) by sending an email to naguirre@tvmwd.com prior to the close of public comment.

The mission of Three Valleys Municipal Water District is to supplement and enhance local water supplies to meet our region's needs in a reliable and cost-effective manner.

1. CALL TO ORDER — KUHN
2. FLAG SALUTE — KUHN
3. ROLL CALL — AGUIRRE
4. AGENDA REORDER/ADDITIONS *[Government Code Section 54954.2(b)(2)]* — KUHN

   Additions to the agenda may be considered when two-thirds of the board members present determine a need for immediate action, and the need to act came to the attention of TVMWD after the agenda was posted; this exception required a degree of urgency. If fewer than two-thirds of the board members are present, all must affirm the action to add an item to the agenda. The Board shall call for public comment prior to voting to add any item to the agenda after posting.

5. PRESENTATIONS — LITCHFIELD

   A. METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA'S GENERAL MANAGER ADEL HAGEKHALIL — LITCHFIELD

B. MWD REGIONAL RECYCLED WATER PROJECT ("CARSON PROJECT") UPDATE — LITCHFIELD

Mr. John Bednarski, Chief Engineer and Group Manager of Engineering Services for Metropolitan Water District of Southern California will provide an update on the Carson Project.

6. PUBLIC COMMENT *(Government Code Section 54954.3)* — KUHN

Opportunity for members of the public to directly address the Board on items of public interest that is within the subject matter jurisdiction of TVMWD. The public may also address the Board on items being considered on this agenda.

We request that remarks be limited to three minutes or less. Pursuant to Government Code Section 54954.3, if speaker is utilizing a translator, the total allotted time will be doubled.

7. PUBLIC HEARING – FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT — KUHN

The Board will convene to a Public Hearing to hear testimony and receive comments prior to considering action to adopt the final program environmental impact report for the Six Basins strategic plan. TVMWD has fully complied with the noticing requirements for this Public Hearing.

In accordance with Government Code Section 6061, the Public Hearing was noticed in newspapers of general circulation, San Gabriel Valley Tribune and Inland Valley Daily Bulletin on October 18, 2021 and October 25, 2021. A copy of the notice is available upon request.

- Open Public Hearing
- Staff report to the Board of Directors
- Consider public comments and testimony
- Close Public Hearing

8. ADOPT RESOLUTION NO. 21-11-907 TO APPROVE FINAL PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT AND CALIFORNIA ENVIRONMENTAL QUALITY ACT DOCUMENTATION FOR THE SIX BASINS STRATEGIC PLAN — PERALTA

The Board will consider approval of Resolution No. 21-11-907.

BOARD ACTION REQUIRED ITEM 8

Staff Recommendation: Approve as Presented

9. GENERAL MANAGER'S REPORT — LITCHFIELD

The Executive Leadership Team will provide brief updates on existing matters under their purview and will be available to respond to any questions thereof.

A. CY 2022 MEETING SCHEDULE — LITCHFIELD

The Board will review the proposed CY 2022 Meeting Schedule.

B. EMPLOYEE'S DEFERRED COMPENSATION — LITCHFIELD

The Board will review proposed changes to the employees deferred compensation program.

C. NEW DISTRICT POLICIES — ROBLES

The Board will review two new potential district policies: (1) Diversity, Equity and Inclusion Policy and (2) Outreach Program Policy.

D. OPEB TRUST – CONSIDERATION OF ADDITIONAL CONTRIBUTION AND INVESTMENT STRATEGIES — LINTHICUM

The Board will review additional contribution and investment strategies for OPEB Trust.

E. OPEB PENSION – CONSIDERATION OF ADDITIONAL CONTRIBUTION AND INVESTMENT STRATEGIES — LINTHICUM

The Board will review additional contribution and investment strategies for OPEB Pension.

F. BONANZA SPRINGS STUDY UPDATE — LITCHFIELD

The Board will be provided an update on the Bonanza Springs Project.

10. CLOSED SESSION — KUHN

A. CONFERENCE WITH LEGAL COUNSEL – ANTICIPATED LITIGATION

- Significant exposure to litigation pursuant to Government Code Section 54956.9(d)(2)
- One potential case

11. FUTURE AGENDA ITEMS — KUHN

12. ADJOURNMENT AND NEXT MEETING — KUHN

The Board will adjourn to a regular Board Meeting on November 17, 2021 at 8:00 AM.

In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, please contact the Executive Assistant at (909) 621-5568 at least 24 hours prior to the meeting.

Pursuant to Government Code Section 54957.5, materials related to an item on this agenda submitted after distribution of the agenda packet will be posted on the TVMWD website at www.threevalleys.com.

Three Valleys MWD Board meeting packets and agendas are available for review at www.threevalleys.com.

THREE VALLEYS MWD

Board of Directors
Staff Report

To: TVMWD Board of Directors

From: Matthew H. Litchfield, General Manager

Date: November 3, 2021

Subject: **Adopt Resolution No. 21-11-907 to Approve Final Programmatic Environmental Impact Report and California Environmental Quality Act Documentation for the Six Basins Strategic Plan**

☒ **For Action**	☐ **Fiscal Impact**	☐ **Funds Budgeted**
☐ **Information Only**	☐ **Cost Estimate**	$

Staff Recommendation:

Staff recommends Board approval of Resolution No. 21-11-907 adopting the Final Programmatic Environmental Impact Report ("PEIR") and related California Environmental Quality Act ("CEQA") documentation and direct the General Manager to file with the State Clearinghouse and the County Clerk of Los Angeles County a Notice of Determination pursuant to PRC Section 21152(a) and CCR Section 15075 consistent with this resolution.

Background:

Six Basins Watermaster (6BWM) developed and completed a Strategic Plan that basin stakeholders may use to help chart out future projects and programs. The 6BWM has completed the evaluation of the potential projects and programs. This process required an environmental review that complies with the California Environmental Quality Act (CEQA). 6BWM administrative staff recommended that a Programmatic Environmental Impact Report (PEIR) be the avenue by which to comply with CEQA.

Through the CEQA process, a public agency must act as the lead agency to offer public review and evaluation of relevant data, receive and address comments associated with the environmental assessment, and to adopt appropriate findings associated with that review. Since 6BWM is not a public agency but rather an arm of the court, its Board of Directors requested that Three Valleys Municipal Water District (TVMWD) serve as the lead agency for the CEQA proceedings associated with the Six Basins Watermaster Strategic Plan.

TVMWD agreed to serve as the lead agency. Through a February 2018 Memorandum of Agreement (MOA) between Six Basins Watermaster and TVMWD, the District assumed the administrative responsibilities (i.e., procuring an environmental consultant and paying invoices).

During the regular Board meeting on May 16, 2018, the Board approved awarding a professional services agreement to the environmental consultant ("Jericho") to prepare a PEIR and all necessary environmental documentation for the Six Basins Strategic Plan.

Discussion:

The consultant has worked directly with Six Basins Watermaster staff during preparation of all environmental documentation related to the PEIR. The consultant completed the Draft PEIR on May 26, 2021, which was made available on the TVMWD website for public viewing. In addition, the consultant completed the Final Mitigation Monitoring and Reporting Programs ("MMRP") earlier this month as well as the Final PEIR which have been posted on the District's website for public viewing.

Written Public Comments were received from California Department of Fish and Wildlife and Endangered Habitats League. Written responses to all public comments have been prepared to thoroughly address the public comments. The responses to public comments have been incorporated into the environmental documentation.

Staff is ready to move forward in accordance with CEQA guidelines.

Next Steps:

In accordance with CEQA and the Guidelines promulgated thereunder, TVMWD has prepared and circulated a draft PEIR for the Six Basins Strategic Plan.

TVMWD prepared and published public notifications for this project pursuant to Government Code Section 6061 in newspapers of general circulation: Inland Valley Daily Bulletin and San Gabriel Valley Tribune. A copy of the PEIR, Notice of Availability and Notice of Intent to Adopt the PEIR were sent to those who commented on the PEIR on October 5, 2021, and included information regarding the availability of the PEIR on the District's website and information regarding the time and place of the District Board meeting. A Public Hearing notice was published on October 18 and 25, 2021 setting the date and time for the public hearing for November 3, 2021.

To date, TVMWD has received written comments on the PEIR, during the public review period, that staff believes have been adequately addressed in writing.

Staff recommends Board approval to adopt the PEIR and related CEQA documentation pending the outcome of the public hearing.

Attachment(s):

Exhibit A – Resolution No. 21-11-907

Exhibit B – Final PEIR and CEQA documentation

Exhibit C – Notice of Public Hearing

Meeting History:

Board of Directors Meeting, May 16, 2018, Action Item

NA/ML

RESOLUTION NO. 21-11-907

A RESOLUTION OF THE BOARD OF DIRECTORS OF THE THREE VALLEYS MUNICIPAL WATER DISTRICT CERTIFYING THE FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE SIX BASINS STRATEGIC PLAN (SCH# 2018091020)

WHEREAS, the Three Valleys Municipal Water District ("District") is a Municipal Water District in the County of Los Angeles and organized and operating pursuant to California Water Code Section 71000 et seq; and

WHEREAS, in implementing the statutory functions of a Municipal Water District, the District seeks to improve its service obligations, including the management and storage of local groundwater within the District's boundaries; and

WHEREAS, pursuant to the California Environmental Quality Act (Public Resources Code, § 21000 et seq.), the State CEQA Guidelines (California Code of Regulations, Title 14, § 15000 et seq.), THE DISTRICT is the lead agency for preparation and certification of the Six Basins Strategic Plan Program Environmental Impact Report (PEIR); and

WHEREAS, in accordance with State CEQA Guidelines section 15063, the District evaluated the Strategic Plan (Project) to evaluate whether an EIR was required; and

WHEREAS, based on this review, the District determined that a Program EIR should be prepared because the Project may have a significant effect on the environment in the following areas: aesthetics, air quality, biological resources, cultural resources/tribal cultural resources, environmental justice, geology/soils/mineral resources/paleontological resources, greenhouse gas emissions, hazards/hazardous materials/airport safety/wildfire, hydrology/water quality, land use/planning, noise, public services, transportation, utilities/service systems/energy; and

WHEREAS, in accordance with State CEQA Guidelines section 15082, on September 12, 2018, the District sent to the Office of Planning and Research State Clearinghouse (State Clearinghouse) and each responsible and trustee agency a Notice of Preparation ("NOP") stating that a Program Environmental Impact Report (State Clearinghouse No. 2018091020) would be prepared; and

WHEREAS, seven (7) comment letters were received in response to the NOP during the 30-day NOP review period between September 11, 2018 and October 12, 2018; and

WHEREAS, pursuant to Public Resources Code section 21083.9 and State CEQA Guidelines sections 15082(c) and 15083, the District held a duly noticed Scoping Meeting on September 26, 2018, to solicit comments on the scope of the environmental review of the proposed Project and no additional comments were received; and

WHEREAS, a Draft Program Environmental Impact Report ("Draft PEIR") was prepared, incorporating comments received in response to the NOP and at the Scoping Meeting; and

WHEREAS, in accordance with State CEQA Guidelines section 15085, a Notice of Completion was prepared and filed with the Los Angeles County Clerk and the State Clearinghouse on May 26,2021; and

WHEREAS, as required by State CEQA Guidelines section 15087(a), the District provided a Notice of Availability of the Draft PEIR to responsible and trustee agencies, interested parties and the public at the same time that the District sent Notice of Completion to the State Clearinghouse and Los Angeles County Clerk, on May 26, 2021; and

WHEREAS, during the public comment period, copies of the Draft EIR and technical appendices were available for review and inspection on the TVMWD website (due to COVID 19 restrictions); and

WHEREAS, pursuant to State CEQA Guidelines section 15105(a), the Draft EIR was circulated for a 60-day review period between May 26, 2021 and July 28, 2021; and

WHEREAS, the District received two (2) written comment letters on the Draft EIR; and

WHEREAS, pursuant to Public Resources Code section 21092.5, the District provided copies of its responses to commenting public agencies at least ten (10) days prior to the District's consideration of the Final PEIR on October 20, 2021; and

WHEREAS, the District has prepared a Final PEIR, consisting of the comments received during the public review and comment period on the Draft PEIR, written responses to those comments, minor revisions to the Draft PEIR, and minor revisions to the MMRPs for each of the Project Categories evaluated in the Draft PEIR. For purposes of this Resolution, the "EIR" shall refer to the Draft PEIR, as revised by the Final PEIR, together with other sections of the Final PEIR; and

WHEREAS, the Findings and Facts in support of this CEQA resolution **(Exhibit A)** are included in the following sections:

- Section A Introduction to the Findings and Facts in Support of the CEQA Resolution
- Section B Project Summary
- Section C Environmental Review of the Project
- Section D Introduction to the Findings
- Section E Findings for Project Category 1 (Pump and Treat) projects
- Section F Findings for Project Category 2 (Water Recharge) projects
- Section G Findings for Project Category 3 (Temporary Surplus) projects
- Section H Findings for Project Category 4 (Monitoring Programs)
- Section I Findings regarding Cumulative Impacts
- Section J Findings regarding Growth Inducing Impacts
- Section K Findings regarding Alternatives
- Section L Summary of Specific Plan Benefits

WHEREAS, the Mitigation Monitoring and Reporting Programs (MMRPs) setting forth the mitigation measures for construction/operation of projects identified in Project Categories 1

through 3 to which the District shall bind itself in connection with the Project, are attached hereto as Exhibit "B"; and

WHEREAS, prior to taking action, the Board has heard, been presented with, reviewed, and considered all of the information and data in the administrative record, including the PEIR, and all oral and written evidence presented to it during all meetings and hearings; and

WHEREAS, the EIR reflects the independent judgment of the Board and is deemed adequate for purposes of making decisions on the merits of the Project; and

WHEREAS, the District has not received any additional comments or information that constituted substantial new information requiring recirculation under Public Resources Code section 21092.1 and State CEQA Guidelines section 15088.5; and

WHEREAS, all the requirements of CEQA and the State CEQA Guidelines have been satisfied by the District in the PEIR and the attached Findings and Facts, which is sufficiently detailed so that all of the potentially significant environmental effects of the Project have been adequately evaluated; and

WHEREAS, all other legal prerequisites to the adoption of this Resolution have occurred.

NOW THEREFORE, BE IT RESOLVED by the Board of Directors of the Three Valleys Municipal Water District of Los Angeles County that, pursuant to PRC Section 21080(c) and CCR Section 15074(b), on the basis of the whole record before the District's Board of Directors (including the PEIR and any comments received) there is no substantial evidence that the Project will have a significant effect on the environment if the mitigation measures contained in the attached MMRPs (Exhibit B) hereto and incorporated herein and incorporated into the Project, and said PEIR reflects the District's independent judgement and analysis.

BE IT FURTHER RESOLVED that the District's Board of Directors hereby adopts the attached PEIR for the Project and adopts the MMRPs for projects in each of the Project Categories (1 through 3) as required by CCR Section 15074(d), and hereby certifies the Final PEIR.

BE IT FURTHER RESOLVED that the District's General Manager is hereby authorized and directed to file with the State Clearinghouse and the County Clerk of Los Angeles County a Notice of Determination pursuant to PRC Section 21152(a) and CCR Section 15075 consistent with this resolution within five working days after adoption of this resolution.

BE IT FURTHER RESOLVED that the custodian of the documents or other materials which constitute the record of proceedings upon which the District's decision is based shall be the District's General Manager, and the location of said records shall be the District's headquarters located at 1021 East Miramar Avenue, Claremont, California.

ADOPTED and **PASSED** at a meeting of the Three Valleys Municipal Water District's Board of Directors held via teleconference, on this 3rd day of November 2021 by the following vote:

AYES:

NOES:

ABSTAIN:

ABSENT:

_____
Bob G. Kuhn, President

ATTEST:

_____
Carlos Goytia, Secretary

SEAL:

EXHIBIT A FINDINGS OF FACT

A. INTRODUCTION

The Three Valleys Municipal Water District (TVMWD) in consultation with Six Basins Watermaster (Watermaster) Parties (stakeholders), in approving the Strategic Plan for the Six Basins Program Environmental Impact Report (Program EIR), make the findings described below. These findings are based on the facts presented in public hearings on this matter, presented in the staff reports, environmental documents, and other information presented to TVMWD and summarized in this document. The Final Program EIR for the Strategic Plan, State Clearinghouse (SCH) No.2018091020, will be referred to herein as the "Final Program EIR or FPEIR". The total action that may be implemented by approval of the proposed Six Basins Strategic Plan consists of all of the actions outlined in the FPEIR. The Watermaster is a public partnership of cities, Pomona College, water suppliers (including TVMWD), mutual water companies in the eastern San Gabriel Valley who have adjudicated water rights and common goals for sustainable water management within the Six Basins project area. Implementation of this long-term regional plan to rehabilitate existing wells and treatment facilities or create new treatment facilities; expand or create new recharge basins; and interconnect the facilities would result in increased groundwater recharge, increased water treatment and storage and decreased reliance on State supplied water within the Six Basins. Strategic Plan projects would be completed by TVMWD and other Watermaster Parties over a projected period of 20 years.

The California Environmental Quality Act (CEQA) Guidelines Section 15091 states that:

No public agency shall approve or carry out a project for which an EIR has been completed which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

(a) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

(b) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other.

(c) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

The required findings shall be supported by substantial evidence in the record (CEQA Guidelines, Section 15091).

All significant and potentially significant impacts identified in the Draft Program EIR can be reduced to less than significant levels through mitigation measures identified in the Draft Program EIR (DPEIR). The FPEIR incorporates the DPEIR. References to the "Program EIR" are to the collective documentation contained in the Draft and Final Program EIRs.

The DPEIR was prepared as a complete environmental document that encompasses all the issues identified as having a potential to cause significant adverse environmental impacts during the Notice of Preparation (NOP) phase including written comments on the NOP and comments received during the Public Scoping Meeting. The FPEIR was prepared following a 60-day public review period of the DPEIR. The FPEIR incorporates the DPEIR, comments received and lead agency responses, and minor revisions to the DPEIR for clarification that do not represent new significant information that would require recirculation of the DPEIR.

The FPEIR serves as an informational document intended for use by TVMWD and other Watermaster Parties, Responsible and Trustee Agencies, and the general public in evaluating the potential environmental effects of implementing the Strategic Plan. The DPEIR concluded that potential impacts associated with implementation of Strategic Plan were less than significant or could be mitigated to a less than significant level with implementation of mitigation measures to address these potentially significant issues.

B. PROJECT SUMMARY

B.1 PROJECT LOCATION

The Six Basins are six interconnected groundwater basins located within the Southern California region along the base of the San Gabriel Mountains in the eastern San Gabriel Valley. The basins are Canyon Basin, Upper Claremont Heights Basin (UCHB), Lower Claremont Heights Basin (LCHB), Pomona Basin, Live Oak Basin and Ganesha Basin. The limits of the Six Basins area are generally the San Gabriel Mountains to the north, the San Jose Hills to the south, the Main San Gabriel Basin to the west, and the Chino Basin to the east.

The Six Basins generally underlie an urbanized area that includes the cities of Claremont, La Verne, Pomona, and Upland and adjacent small unincorporated Los Angeles County communities, and the unincorporated community of San Antonio Heights adjacent to the City of Upland in western San Bernardino County.

B.2 MAJOR ISSUES FACING THE SIX BASINS WATERMASTER

The Six Basins project area is part of the greater southern California region, a region with a Mediterranean climate characterized as relatively dry, with mild winters and hot summers. The region has experienced prolonged dry periods that will likely be exacerbated by climate change in the future. The Strategic Plan takes into consideration availability of current and future water supplies and considers possible fluctuations in demand forecasts due to historic climate patterns as well as potential impacts associated with climate change which is altering hydrologic conditions statewide.

The main source of groundwater replenishment to the Six Basins is surface-water runoff from precipitation that falls on the San Gabriel Mountains and recharges at spreading grounds located along the foot of the mountain range. In addition to recharge of mountain runoff, imported water from the State Water project and the Colorado River is used for artificial recharge at the spreading grounds and for direct consumptive uses through agreements with the Metropolitan Water District of Southern California (MWDSC). The stability of each of these water sources is unpredictable due to changing climatic conditions in the State of California and in the larger region of the western U.S.

The major issues facing TVMWD and other Watermaster Parties in their management of surface water resources are:

- The climate of the region is such that the Six Basins area is subject to prolonged dry periods. In years when precipitation is below average, the volume of surface-water runoff that is available for artificial recharge at spreading grounds in the Six Basins is small, so the facilities for artificial recharge go largely unutilized.

- The facilities to divert and recharge stormwater runoff do not capture all the runoff that is available. Stormwater runoff that bypasses the spreading grounds is a loss of a low-cost, high-quality water resource.

- The current methods and protocols employed by the US Army Corps of Engineers (USACE), Los Angeles County Flood Control District (LACFCD), and the Pomona Valley Protective Association (PVPA) to monitor the surface-water resources may not be returning accurate data for surface-water discharges and diversions. The completeness and accuracy of these data are crucial to the development and implementation of programs to improve basin management.

Although the population increase in the urbanized project area is projected to be a modest 8 percent over a 20-year period (2020 – 2040) when Strategic Plan projects are anticipated to be constructed and in operation, the larger issue facing the Six Basins Watermaster Parties, is the long-term sustainability (considering current use and future availability) of the water supply and the quality of that resource in order to guarantee a safe supply of potable water for the residential, commercial and industrial water users in the future.

B.3 PROJECT GOALS AND OBJECTIVES

Implementation of the Strategic Plan would be accomplished through the development of a number of projects identified by the Watermaster Parties. The Watermaster Parties have developed management goals for the Strategic Plan that address the issues, needs, and wants of the Parties. Implementation would result in changes in the current management of the Six Basins, improvements to existing facilities, and development of new facilities. Each project has elements of storage and yield management, recharge management and water quality management, and will require new monitoring for both design and implementation. The management goals are as follows:

Goal No. 1 – Enhance Water Supplies. The Parties desire to have a diverse, cost-effective water supply portfolio that will allow them to reliably meet their water demands now and into the future. Imported water has long been a vital supply for water purveyors in Southern California, but imported water is becoming increasingly more expensive, and its reliability is threatened by natural disasters, climate change, and changing environmental regulations. Maximizing the sustainable use of local water supplies, including groundwater, surface water, and recycled water to meet future demands is the focus of the Parties. In particular, enhancing the groundwater supply of the Six Basins means increasing the yield. To achieve this goal, the Parties must find ways to increase recharge, increase treatment and pumping, and reduce losses in a cost-effective manner.

Goal No. 2 – Enhance Basin Management. Enhancing the water supplies of the Six Basins will require advanced basin management beyond that which is provided for in the Judgment. Increasing the yield and reliability of the Six Basins to ensure the maximum and equitable availability of groundwater for all Parties requires coordinated plans for recharge, pumping, and storage. Maximizing the use of local water supplies may necessitate partnerships with other local groundwater basins or water-supply agencies to maximize the use of assets, such as surface-water availability, storage capacity, recharge capacity, and funding. No harm must come without mitigation to the Parties, the groundwater basins, or the environment from the activities to enhance basin management.

Goal No. 3 – Protect and Enhance Water Quality. The Parties desire to improve groundwater quality in the Six Basins and deliver water that is safe and suitable for the intended beneficial use and meets all applicable regulatory standards. Management of groundwater quality, through the cleanup of point-source contamination and control of salt and nutrient accumulation, is essential to ensuring the long-term reliability of the groundwater supply in a cost-effective manner.

Goal No. 4 – Equitably Finance the Strategic Plan. The primary source of revenue to finance the development and implementation of the Strategic Plan are the consumers of Six Basins groundwater, but other sources of revenue will be aggressively pursued. The policies and agreements to implement the Strategic Plan will ensure an equitable distribution of costs relative to the benefits.

B.4 PROJECT CHARACTERISTICS

The Watermaster Parties, including TVMWD, are proposing to construct and operate projects in a coordinated manner to optimize water resources management activities in the Six Basins, and thereby increase the reliability of regional water supplies. Implementation of the Strategic Plan includes two elements: 1) a planning element consisting of the development of an updated Operating Plan (last updated in 2012) for storage and recovery agreements, special projects, and temporary surplus; and 2) a physical element consisting of the construction of new facilities and/or improvements to existing facilities, and on-going operation/maintenance of those facilities.

The main source of groundwater replenishment to the Six Basins is surface-water runoff from precipitation that falls on the San Gabriel Mountains and recharges at spreading grounds located along the foot of the mountain range predominantly at the two existing recharge facilities (basins) in the San Antonio Spreading Grounds (SASG) located south of the San Antonio Dam, as well as the TVWMD's Miramar ponds, located in the southerly portion of the SASG. Additional spreading occurs at the Pedley Spreading Grounds (PSG) fed from a pipeline originating in the SASG. In addition to groundwater pumping, imported water from the State Water project and the Colorado River is used for artificial recharge at the spreading grounds and for direct consumptive uses through agreements with MWDSC. Imported water from MWDSC not used for recharge is treated at one of two water treatment plants – TVMWD's Miramar WTP located in the City of Claremont and the Weymouth WTP located in the City of La Verne.

Implementation of the Operating Plan would be accomplished through the construction and operation of new or upgraded facilities. The planning period for the Strategic Plan is approximately 58 years (2017 through 2075). However, for the purposes of the environmental evaluation of the Strategic Plan and its related projects, the DPEIR considered a 20-year planning period for basin management activities consisting of construction and operation of various

facilities that fall into the following categories: Project Category 1- Pump and Treat; Project Category 2 – Stormwater and Supplemental Water Recharge; Project Category 3 – Temporary Surplus; and an additional category, Project Category 4 - Monitoring Programs in Support of the Strategic Plan. This last category is limited to research, evaluation and reporting of groundwater data to be used in decision making as well as to identify new projects to meet Strategic Plan goals.

For the environmental evaluation of Strategic Plan implementation, the four project categories are summarized herein:

Project Category 1: Pump and Treat. These projects were conceptualized to (1) remove contaminants from groundwater and put the treated groundwater to beneficial use and (2) lower groundwater levels to reduce the threat of high groundwater and increase the yield of the Pomona Basin by reducing subsurface outflow. These types of projects also can facilitate the Conjunctive Water Management (CWM) program by creating storage space in the Pomona Basin to facilitate the implementation of a storage and recovery program, and by increasing groundwater-pumping capacity to enable "takes" from storage. These projects include:

- Increase Groundwater Production and Treatment Capacity at Reservoir 5 Treatment Facility
- Increase Groundwater Production and Treatment Capacity at Lincoln/Mills Treatment Facility
- Rehabilitate Del Monte 4 and Add Arsenic Treatment
- Construct Durward 2 Well and a Wellhead Treatment Facility
- Rehabilitate Old Baldy Well and Construct Wellhead Treatment Facility

Project Category 2: Stormwater and Supplemental Water Recharge. These projects were conceptualized to enhance the yield of the Six Basins by increasing the capacity to divert and recharge stormwater, improve groundwater quality through the recharge of high-quality stormwater, and increase the volume of groundwater that can be sustainably pumped from the Six Basins via recharge of supplemental water. Such projects can facilitate the implementation of a CWM program by increasing the volumes of stormwater recharge and providing additional recharge capacity for supplemental water recharge during "put" years. These projects include:

- Enhance Stormwater Recharge at the San Antonio Spreading Grounds
- Enhance Supplemental-Water Recharge at the SASG
- Enhance Stormwater Recharge at the Thompson Creek Spreading Grounds
- Supplemental-Water Recharge at the TCSG
- Enhance Stormwater Recharge at the Pedley Spreading Grounds
- Recharge Stormwater and Supplemental Water at the LA County Fairplex
- Enhance Stormwater Recharge through MS-4 Compliance (Pedley and Fairplex sites)

Project Category 3: Temporary Surplus. These projects were conceptualized to increase groundwater pumping during wet periods to minimize the potential for high groundwater conditions, provided that the pumping wells that extract the temporary surplus are located in areas that will mitigate the potential for high groundwater. *Project Category 3* projects can facilitate the implementation of a CWM program by increasing the use of surplus groundwater during wet periods, which can then be used for in-lieu recharge of the Pomona Basin. These projects include:

- Construct Interconnections (pipelines) between water supply agencies
- Rehabilitate P-20 and a Wellhead Treatment Facility
- Construct New Production Wells

Although improvements at the City of Pomona's P-20 well site is classified as a Project Category 3 project, because the improvements included rehabilitating the existing well and adding treatment for high nitrate concentrations, it was evaluated in the DPEIR along with Project Category 1 projects.

Project Category 4. Monitoring Programs in Support of the Strategic Plan. Under existing conditions Watermaster conducts a comprehensive groundwater-level monitoring program across the Six Basins project area. The information developed from this monitoring program is used to identify potential impacts associated with the threat of high groundwater, pumping sustainability, chronic lowering of groundwater levels, developed yield and subsurface outflow to the Chino Basin. Category 4 projects consist of the development and implementation of groundwater monitoring programs to support the necessary engineering investigations to (i) design the new facilities, (ii) develop the operating plans for the new and existing facilities, and (iii) adapt operations in the future to achieve the project goals. The expanded monitoring programs would include improved monitoring methods at existing facilities and the construction of new monitoring facilities at specific locations.

- Construct New Monitoring Wells

For the purposes of efficiency in evaluating the potential environmental impacts associated with the development of new monitoring wells, these wells were evaluated with the development of new production wells in Project Category 3. Therefore, the DPEIR considered Project Category 4 to be developing and implementing monitoring programs, development of operating plans and designing (but not construction of) new facilities.

B.5 REGULATORY REQUIREMENTS

Implementation of physical components of the Strategic Plan such as new recharge basin construction or the expansion of existing basins, construction or rehabilitation of wells and water treatment facilities, construction of new interconnects (pipelines) between wells and treatment facilities, will, in some cases, each require the submittal of a Notice of Intent (NOI) to the State Water Resources Control Board (SWRCB) for a NPDES (National Pollution Discharge Elimination System) general construction stormwater discharge permit. This permit is granted by submittal of an NOI to the SWRCB but is enforced through a Storm Water Pollution Prevention Plan (SWPPP) that identifies construction best management practices for the site. In the project area, the Los Angeles, and Santa Ana Regional Water Quality Control Boards (Regional Boards) enforces the best management practice requirements described in the NPDES permit by ensuring construction activities adequately implement a SWPPP.

Regulatory permits to allow fill and/or alteration activities due to a project such as new or expanded retention basins and pipeline installation may require permits from the Army Corps of Engineers (ACOE), either of the Regional Boards, and California Department of Fish and Wildlife (CDFW) prior to project development. A Section 404 permit for the discharge of fill material into "waters of the United States" may be required from the ACOE; a Section 401 Water Quality Certification may be required from either of the Regional Board; a Report of Waste Discharge

may be required from the Regional Board; and a 1600 Streambed Alteration Agreement may be required from the CDFW. A determination of permit requirements would be made on a project-by-project basis as a project is proposed.

The U.S. Fish and Wildlife Service (USFWS) and/or CDFW may need to be consulted regarding threatened and endangered species that may be found to be present during the subsequent biological resources field surveys for such projects as recharge basins and/or pipeline development. For these projects an Incidental Take Permit (CDFG Section 2081) may be required prior to undertaking any construction activities.

Consultation with local jurisdictions, such as the cities of Claremont, La Verne, Pomona, or Upland, and the two counties (Los Angeles and San Bernardino) may be required where jurisdictions require project review.

Air quality permits to construct and operate may be required from the South Coast Air Quality Management District (SCAQMD) for new treatment facilities.

Encroachment permits may be required from local jurisdictions, such as individual cities, California Department of Transportation (Caltrans), the two counties (Los Angeles and San Bernardino), Flood Control agencies, Metropolitan Water District of Southern California. and private parties such as Southern California Edison or Southern California Gas Company.

State Water Resources Control Board will be a responsible agency if permits or funding are requested from the State Revolving Fund Program or Division of Drinking Water.

Finally, Watermaster has a separate approval process for determining material physical injury to the stakeholders within the Six Basins project area.

The above is considered to be a partial list of permitting agencies for projects identified in the Strategic Plan, or other future individual projects as proposed by TVMWD or other Watermaster Party. Additional agencies/permits bay e identified as subsequent projects are brought forward.

C. ENVIRONMENTAL REVIEW

The entire administrative record, including the Six Basins Strategic Plan Draft and Final Program EIRs, public comments and responses, TVMWD Staff reports, and these facts and findings serve as the basis for TVMWD's environmental determination. The TVMWD Board's environmental determination is that the Six Basins Strategic Plan Final Program EIR – consisting of the DPEIR, comments on the DPEIR and responses, and mitigation monitoring and reporting programs (MMRP) for each category of projects - addresses all of the potential impacts associated with implementing the Strategic Plan and its related projects.

As outlined above and defined in detail in Chapter 3 of the DPEIR. The detailed project specific and cumulative environmental impacts and proposed mitigation measures for the future development of the proposed projects are presented in Chapter 4 of the DPEIR, in the Executive Summary Chapter and in the response to comments which is part of the Final Program EIR (FPEIR Chapter 2). Evaluations of growth inducement and irreversible commitment of resources are provided in Chapter 5 of the DPEIR. Alternatives to the proposed project are discussed in Chapter 6 of the DPEIR. The findings outlined in the following section of this document contain

a summary of the facts used in making findings and determinations for each environmental issue addressed in the Final Program EIR.

1. Consideration of the EIR: The CEQA environmental review process for the Six Basins Strategic Plan was initiated on September 11, 2018, with the release of a Notice of Preparation (NOP) for public review and comment. The NOP 30-day review period ended on October 12, 2018. The NOP was distributed to responsible and trustee agencies, other interested agencies and organizations, the State Clearinghouse, the County Clerks of Los Angeles, and San Bernardino counties, and interested parties contained on the Watermaster's mailing list. A scoping meeting was held on September 26, 2018 in the TVMWD Board Room, in the City of Claremont, California.

The DPEIR was prepared to address the issues identified through preliminary environmental review and presented in the NOP and attached comprehensive project description. In addition, the DPEIR considered all issues raised in comments received in response to the NOP and provided an informational document intended for use by the TVMWD and other Watermaster Parties, responsible and trustee agencies and other interested parties, and the general public in evaluating the potential environmental effects associated with the implementation of the Strategic Plan and the projects described therein. The NOP provided a comprehensive project description to allow commentors to identify potential significant impacts that should be evaluated in the DPEIR. After review of the NOP comments, the scope of the DPEIR was finalized and no additional issues were added to the scope of the DPEIR.

Technical documents relied upon for the analyses are provided in the appendices of the DPEIR. The air quality and greenhouse gas emissions forecasts, the noise analysis and the energy analysis were provided by Urban Crossroads; the cultural resources due diligence report was provided by CRM TECH; the hydrology and water quality analyses were provided by Wildermuth Environmental (West Yost); and the biological analysis was provided by Jericho Systems in coordination with ELMT Consulting.

The DPEIR was released to the public for review and comment on May 26, 2021. As allowed under CEQA Guidelines Section 10105, TVMWD opted to provide a 60-day review period for the DPEIR which closed on July 28, 2021. A total of two comment letters were received on the Draft Program EIR.

A link to the FPEIR on TVMWD's website was transmitted to all interested parties, including public agencies that commented on the Draft Program EIR, to fulfill the requirements of Section 21092.5 of CEQA. The Six Basins Strategic Plan Final Program EIR and all supporting material has been made available to the TVMWD Board and a summary of the Final Program EIR and its findings presented directly to the Board for consideration in making its decision to certify the Six Basins Strategic Plan Final Program EIR and approve the Strategic Plan.

The TVMWD Board makes the following certifications pursuant to CEQA Guidelines Section 15090:

> The Board finds and certifies that the Strategic Plan Final Program EIR has been completed in compliance with CEQA. The Board certifies that all voting members have reviewed and considered the Final Program EIR prior to approving the Strategic Plan (Project). In addition, all voting Board members have reviewed and

considered the additional information presented at or prior to the public hearing on October 20, 2021. The Board further finds and certifies that the Final Program EIR reflects the independent judgment and analysis of TVMWD, its Board and Staff and the Final Program EIR is adequate to make a decision for this proposed project.

2. Full Disclosure: The TVMWD Board finds and certifies that the Strategic Plan Final Program EIR constitutes a complete, accurate, adequate, and good faith effort at full disclosure under CEQA.

3. Location of Record Proceedings: The documents and other materials which constitute the record of proceeding upon which this decision is based are in the custody of TVMWD located at 1021 Miramar Avenue, Claremont, CA 91711. This information is provided in compliance with CEQA Section 21081.6(a)(2).

4. Three Valleys Municipal Water District as Lead Agency under CEQA: The Three Valleys Municipal Water District is the "lead agency" as defined by CEQA Guidelines Section 15050. In compliance with its authority and responsibility as a municipal water district and Six Basins Watermaster Party, TVMWD has prepared the Draft and Final Program EIRs for the proposed Strategic Plan and related projects, compiled these candidate facts and findings in accordance with CEQA and the CEQA Guidelines, and will carry out all other duties and responsibilities required of a lead agency under CEQA and the CEQA Guidelines.

D. FINDINGS

Presented below are the environmental findings made by TVMWD after its review of the documents referenced above; and consideration of written and oral comments on the proposed Strategic Plan (Project) at public hearings, including all other information provided during the decision-making process. These findings provide a summary of the information contained in the Final Program EIR, related technical documents, and the public hearing record that have been referenced by the TVMWD Board in making its decision to approve the Six Basins Strategic Plan.

The Final Program EIR prepared for the proposed Project addresses the consequences of implementing the Strategic Plan and related projects including the rehabilitation of existing groundwater wells and treatment facilities or construction of new treatment facilities; the development or expansion of groundwater recharge basins; and the construction and operation of new production and monitoring wells; and the construction of interconnections (pipelines) between new production wells and treatment facilities or between the Pomona Treatment Plant and the new San Antonio Spreading Grounds recharge basin.

This Final Program EIR, and supporting technical studies, evaluated all 18 major environmental issues categories as set forth in Appendix G of the CEQA Guidelines for potential significant adverse impacts. Short and long-term impacts and project-specific and cumulative impacts associated with the implementation of the proposed project were evaluated. Some of the issue categories contained several sub-issues which are summarized within each set of findings below.

Of these 18 major environmental categories, the TVMWD Board concurs with the findings in the Strategic Plan Program EIR, that the issues and sub-issues discussed below would have no impact, a less than significant impact and no mitigation is required, or an impact can be reduced to a less than significant level with implementation of mitigation measures. On a project-by-project basis,

as Strategic Plan projects are developed implementation of all mitigation measures that are applicable to each individual project would result in the reduction of impacts to less than significant levels. The FPEIR Chapter 4 contains the Mitigation Monitoring and Reporting Programs (MMRP) for each of the Project Categories with the exception of Project Category 4 where no changes to the physical environment would occur at this category is limited to developing and implementing monitoring programs, developing operating plans and designing (but not construction of) new facilities.

Because the Final Program EIR evaluated four categories of projects, these environmental findings are presented by project category and within each project category findings have been made for impacts as follows:

- No Impact or Less than Significant Impact; or
- Less Than Significant with Implementation of Mitigation Measures

Section E contains the findings for Project Category 1 (*Pump and Treat*) projects. Those environmental issues identified in the Final Program EIR for *Pump and Treat* projects as having no impact or no potential for significant adverse impact and therefore no implementation of mitigation measures would be required, are described in Section E.1. The discussion in Section E.2 summarizes the facts and findings for the potentially significant issues for which mitigation has been identified to reduce impacts below a significant level.

Section F contains the findings for Project Category 2 (*Stormwater and Supplemental Water Recharge*) projects. Those environmental issues identified in the DPEIR for Project Category 2 projects as having no impact or no potential for significant adverse impact and therefore no implementation of mitigation measures would be required, are described in Section F.1. The discussion in Section F.2 summarizes the facts and findings for the potentially significant issues for which mitigation has been identified to reduce impacts below a significant level.

Section G contains the findings for Project Category 3 projects. Those environmental issues identified in the Final Program EIR for Project Category 3 projects as having no impact or no potential for significant adverse impact and therefore no implementation of mitigation measures would be required, are described in Section G.1. The discussion in Section G.2 summarizes the facts and findings for the potentially significant issues for which mitigation has been identified to reduce impacts below a significant level.

Section H contains the findings for Project Category 4 (*Monitoring Programs in Support of the Strategic Plan*) projects. Those environmental issues identified in the Final Program EIR for *Monitoring Programs in Support of the Strategic Plan* projects as having no impact or no potential for significant adverse impact, with or without mitigation, are described in Section H.1. Because there are no physical changes in the environment associated with implementation of this category of projects, there are no findings for potentially significant impacts. Monitoring wells that may be developed as part of a monitoring program were evaluated in Project Category 3.

Section I contains the findings for Cumulative Impacts where all Strategic Plan project categories are evaluated in conjunction with the buildout scenarios evaluated in each of the cities (Claremont, La Verne, Pomona, Upland) general plans to determine if implementation of the Strategic Plan would contribute cumulatively to a significant regional impact.

Section J contains the findings for Growth Inducing Impacts that may result from the implementation of the Strategic Plan.

Section K contains the findings for Alternatives to the Strategic Plan.

Section L contains a summary of the benefits that would be created with implementation of the Strategic Plan and related projects. This section contains a discussion of the balancing of benefits and impacts.

Mitigation measures referenced in this document are also contained in the MMRP for each Project Category included in DPEIR Section 8 and are incorporated as part of the Six Basins Strategic Plan FPEIR in Chapter 4 (with minor revision based on responses to comment). The MMRPs set forth each mitigation measure and identifies the person or entity responsible for overseeing or enforcing the mitigation measures. The monitoring program ensures that the measures identified in the FPEIR are implemented in accordance with mitigation discussions in the FPEIR.

E. PROJECT CATEGORY 1 - PUMP AND TREAT

E.1 NO IMPACTS OR LESS THAN SIGNIFICANT IMPACTS IDENTIFIED IN THE FPEIR FOR PROJECT CATEGORY 1 PROJECTS

The following issues were identified in the Six Basins Strategic Plan DPEIR for Project Category 1 projects as having no impact or to have a less than significant impact and therefore no mitigation measures are required. All of these issues were fully addressed and substantiated in the DPEIR. All the following references are to findings in the Six Basins Strategic Plan DPEIR. In the following presentation, each impact is identified; followed by a summary description of the potential effects and rationale for determining that there would be no impact or that the impact would be less than significant.

E.1.1 Aesthetics

Impact 4.1-2 Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway?

Findings: No Impact

Facts: A review of Caltrans List of Officially Designated and Eligible Scenic Highways showed that there are no designated Scenic Highways within the Six Basins project area. The 210 Freeway is listed as being eligible, however, to date, it has not been officially designated. Therefore, there would be no impact to scenic resources as viewed from a State Scenic Highway.

Conclusions: TVMWD finds that none of the proposed Project Category 1 projects would result in damage to a scenic resource within a State Scenic Highway because no such highways have been identified in the Six Basins project area.

E.1.2 Agricultural and Forestry Resources

Impact 4.2.1 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; or Conflict with existing zoning for agricultural use or a Williamson Act contract?

Finding: No Impact

Facts: A search of the California Department of Conservation, Farmland Mapping and Monitoring Program website https://www.conservation.ca.gov/dlrp/fmmp showed that there is no Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance in the project area. In the SASG, the area immediately below the San Antonio dam located within the San Bernardino County, is classified as Grazing Land. The rest of the wash area in the City of Upland is classified as Other Land. In addition, the Los Angeles County map ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf, showed that the entire Six Basins project area within Los Angeles County is classified as Other Lands. Therefore, implementation of the Strategic Plan would not result in the conversion of farmland.

Conclusions: TVMWD finds that there is no zoning for agricultural use or impacts on sites under Williamson Act contracts that would be affected by Project Category 1projects. A review of city zoning maps for the cities of Claremont, La Verne, Pomona, and Upland revealed that there are no project sites identified in the Strategic Plan that are zoned for agricultural uses or under Williamson Act contract. Therefore, implementation of the Strategic Plan and related projects would not result in any conflict with zoning for agricultural use or impact any sites under contract.

Impact 4.2-2 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)); or Result in the loss of forest land or conversion of forest land to non-forest use?

Finding: No Impact

Facts: The Six Basins project area is located on an alluvial fan emanating from the San Gabriel Mountains. The overlying land uses are largely urban/suburban and there are no forest lands designated within any of the jurisdictions that control land use within the Six Basins project area. Therefore, development of Project Category 1projects would not result in the loss of forest land or conversion of forest land to non-forest use.

Conclusions: TVMWD finds that implementation of any of the Project Category 1 projects would not 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 because the overlying land uses are largely urban/suburban and there are no forest lands designated within any of the jurisdictions that control land use within the Six Basins project area.

Impact 4.2-3 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?

Findings: No Impact

Facts: Implementation of the Strategic Plan would not result in impacts on farmland or forest land as there are no properties with this designation within the Six Basins project area. There are a few remnant groves located within the Canyon Basin area, however, none of the Project Category 1projects are located within this basin. Therefore, there would be no impact.

Conclusions: TVMWD finds that implementation of Project Category 1 projects would not result in conversion of farmland, to non-agricultural use or conversion of forest land to non-forest use because none of the Project Category 1 project sites support agriculture or forest/timber lands.

E.1.3 Air Quality/Greenhouse Gas Emissions/Global Climate Change

Impact 4.3-3 Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?

Findings: Less Than Significant Impact

Facts: Potential odor sources associated with proposed projects may result from construction equipment exhaust during construction activities. The temporary storage of typical solid waste (refuse) may also cause odors, however, during construction, contractors would be responsible for maintaining a clean orderly site as would be set forth in a site-specific Stormwater Pollution Prevention Plans (SWPPP) (see Section E.2.8 below). Any construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the lead agency's solid waste regulations. Therefore, odors associated with the proposed project construction and operations would be less than significant and no mitigation is required.

Conclusions: TVMWD finds that impacts associated with implementation of Project Category 1 projects would be temporary during construction, and that odors can be controlled through good housekeeping on site. Further, any construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. Therefore, odors associated with the proposed project construction and operations would be less than significant and no mitigation is required.

Impact 4.3-6 Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Findings: Less Than Significant Impact

Facts: Project Category 1 projects generally consist of construction activity and do not include trip-generating land uses (residential, commercial, industrial) or facilities that would generate any substantive amount of on-going GHG emissions. Short-term GHG emissions associated with the 13-month construction schedule for the three projects selected to represent a worst-case scenario, are below the 3,000 MTCO2e/year screening threshold. Therefore, the proposed projects would not generate a significant amount of GHG emissions. The proposed Strategic Plan

projects would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Impacts are less than significant in this regard.

Conclusions: TVMWD finds that Project Category 1 projects would not generate a significant amount of GHG emissions and therefore would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

E.1.4 Biological Resources

Impact 4.4-2 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; or 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?

Findings: Less Than Significant Impact

Facts: All Project Category 1 project sites are located in urban areas and not located near a sensitive natural community including riparian habitat or protected wetlands. Each of the project sites is developed with existing groundwater pumps and treatment facilities, are separated from adjacent properties by walls and/or fences, and are all located adjacent to urban uses, not including flood control channels. Therefore, construction and operations activities associated with the development and operation of Project Category 1 projects would not have a substantial adverse effect on any riparian habitat or other sensitive natural community; or wetlands identified by any public agency.

Conclusion: TVMWD finds that construction and operations activities associated with the development and operation of Project Category 1projects would not have a substantial adverse effect on any riparian habitat or other sensitive natural community; or wetlands identified by any public agency because these projects would all be implemented on sites in urban areas that are already developed with water production and/or treatment facilities.

Impact 4.4-3 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?

Findings: Less Than Significant Impact

Facts: This category of projects consists of improvements to existing facilities in urban areas. Project Category 1 project sites are already developed with groundwater wells and related facilities including perimeter walls and pavement, gravel, or compacted soil and do not provide habitat for native resident or migratory species including movement of wildlife species through the area or native wildlife nursery sites.

Conclusions: TVMWD finds that all Project Category 1 project sites are located in urban areas and are enclosed by walls or fences such that animal movement through or across a site is limited. Therefore, construction and operations activities associated with the development and operation of Project Category 1 projects would not have a substantial adverse effect on wildlife movement.

Impact 4.4-4 Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Findings: Less Than Significant Impact

Facts: This category of projects consists of improvements to existing Project Category 1 facilities. These project sites are already developed with groundwater wells and related facilities including perimeter walls or fences, and pavement, gravel, or compacted soil. None of the Project Category 1 sites are located in an area covered by a Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, there would be no impact associated with Project Category 1 projects.

Conclusions: TVMWD finds that none of the Project Category 1 project sites are located in an area covered by a Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, there would be no impact associated with Project Category 1 projects.

E.1.5 Environmental Justice

Impact 4.6-2 Result in a disproportionate decrease in the employment and/or economic base of minority and/or low-income populations of working or residing in the area surrounding the project area?

Findings: Less Than Significant Impact

Facts: Implementation of the Strategic Plan and related projects would not result in a decrease in employment and/or economic base of minority and/or low-income populations because none of the proposed projects include the displacement of any urban uses (e.g., residential, commercial, institutional) that would result in the loss of jobs. In addition, all Project Category 1 projects are on sites already developed with well sites and related infrastructure and thus would not be developed on sites that could otherwise be utilized for a commercial or industrial use that would generate employment opportunities.

Conclusions: TVMWD finds that implementation of Project Category 1 projects would not result in a decrease in employment and/or economic opportunities because all sites are already developed with groundwater wells and some with treatment plants. Therefore, implementation of these projects would have a less than significant impact on the employment or economic base.

Impact 4.6-3 Present opportunities to address existing disproportionate impacts on minority, low-income, or indigenous populations that are addressable through the project?

Findings: No Impact

Facts: The proposed Strategic Plan and related projects are neutral on the issue of disproportionate impacts on minority, low-income, or indigenous populations. The intent of the Strategic Plan is to address water supply and water quality issues throughout the Six Basins project area regardless of residents' race or income status. The intent of implementation of Project Category 1 projects is to upgrade existing groundwater production wells and provide additional groundwater treatment in order to provide additional water supplies within the project area regardless of minority or income status.

Conclusions: TVMWD finds implementation of Project Category 1 projects would not adversely affect minority, low-income, or indigenous populations. Upgrading existing groundwater wells and treatment facilities or adding new treatment facilities would result in an increase in the production of groundwater and the treatment of that water for use by Watermaster Parties that provide drinking water within the Six Basins project area for all residential and non-residential users.

E.1.6 Geology and Soils/Paleontological Resources/Mineral Resources

Impact 4.7-5 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?

Findings: No Impact

Facts: Project Category 1 projects do not include facilities that would require the use of septic systems. There is no planned use of a project site that would require employees to be on-site for extended periods that would require the use of restroom facilities, and none are planned at any of the sites. Therefore, no impact would occur relative to soil suitability for septic tanks or alternative wastewater disposal systems.

Conclusion: TVMWD finds that there are no septic systems associated with the implementation of Project Category 1 projects. Therefore, no impact would occur relative to soil suitability for septic tanks or alternative wastewater disposal systems.

Impact 4.7-7 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 loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

Findings: Less Than Significant

Facts: The majority of the Six Basins project area as designated by the State as MRZ-2 which indicates that the area contains potentially significant sand and gravel deposits that are to be conserved and any proposed development plan must consider access to the deposits for purposes of extraction. However, all of the Project Category 1 project sites are relatively small in size, and are already developed with a combination of wells, treatment facilities and pipelines. In addition, these sites are all surrounded by urban uses so there are no available mineral resources that would be affected by the implementation of the Project Category 1 projects. In addition, Project Category 1 projects would not prevent the future availability of aggregate material (the known resources in the region) to be mined in other areas of the Six Basins project area such as in the SASG where aggregate mining currently occurs.

Conclusions: TVMWD finds that Project Category 1 project sites are relatively small sites that are already developed with water uses in urban areas so that there is no opportunity to recover mineral resources at these sites.

E.1.7 Hazards/Hazardous Materials/Airport Safety/Wildfire Hazards

Impact 4.8-3 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?

Findings: No Impact

Facts: A review of the databases including EnviroStor and GeoTracker showed that none of the projects in Project Category 1 are listed as a hazardous materials site pursuant to Government Code Section 65962.5.

Conclusions: TVMWD finds that no Project Category 1 project site has been identified as a hazardous materials site on any of the State's hazardous materials databases.

Impact 4.8-4 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?

Findings: Less Than Significant Impact

Facts:

Ontario Airport

Due to the nature of the Project Category 1 projects as upgrades to existing wells and/or treatment facilities where no permanent or long-term human activity (residents or employees) would occur, the proposed projects would not conflict with the Ontario Airport Land Use Compatibility Plan (ALUCP). Therefore, regarding the Ontario International Airport, there would be no impact on Airport Compatibility associated with Project Category 1 projects.

Brackett Field

Most of the City of La Verne falls into Zone D or Zone E of the Brackett Field ALUCP. These zones have the fewest restrictions and are categorized as having "normally compatible" or "conditional" land use acceptability across most categories. In addition, none of the projects identified in the Strategic Plan include habitable structures or buildings/structures of significant height that would interfere with the operation of the Brackett Field Airport. Therefore, regarding Brackett Field, there would be no impact on Airport Compatibility associated with Project Category 1 projects.

Cable Airport

Regarding the Cable Airport ALUCP, most of the Six Basins project area lies within Zone D and Zone E, the least restrictive zones where there is no limit on the number of people that may occupy the site; maximum lot coverage may reach 100 percent; and structures and trees may reach heights of 100 feet above the ground surface. There are no Project Category 1 projects located in the City of Upland. Therefore, regarding Cable Airport, there would be no impact on Airport Compatibility associated with Project Category 1 projects.

Conclusion: TVMWD finds that implementation of any of the Project Category 1 projects would not result in a safety hazard or excessive noise for people residing or working in the project

area. Due to the nature of the Project Category 1 projects as upgrades to existing wells and/or treatment facilities where no permanent or long-term human activity (residents or employees) would occur, the proposed projects would not conflict with any of the Airport Land Use Compatibility Plans.

Impact 4.8-5 Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?

Findings: Less Than Significant Impact

Facts: Designated Fire Severity Safety Zones are located in the foothills of the San Gabriel Mountains and along the San Antonio Spreading Grounds. There are no Project Category 1 projects proposed in these areas. Because the location of the sites where Project Category 1 projects are not within an area where wildland fires occur but are generally located within the urban portion of the Six Basins project area, the potential for project sites to be adversely impacted by wildland fires would be less than significant.

Conclusions: TVMWD finds that implementation of Project Category 1 projects would not expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires because none of the sites are located within a designated wildfire hazard zone.

Impact 4.8-7 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 wildfire?

Findings: Less Than Significant Impact

Facts: There are no occupants (residents or employees) associated with the proposed projects in this category. In addition, Project Category 1 projects are all located on sites within the urban areas of the Six Basins project area, and not within a High Fire Severity Zone where wildfire risk is greatest due to a combination of steep topography, dry vegetation (fuel) and wind factors (e.g., Santa Ana wind conditions). Therefore, there is a less than significant impact associated with the rehabilitation of existing wells and treatment facilities, and the development of new treatment facilities at existing sites. Construction and operational activities would not exacerbate wildfire risk such as pollutant concentrations or uncontrolled spread of wildfire.

Conclusions: TVMWD finds that implementation of Project Category 1 projects would not expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires because none of the sites are located within a designated wildfire hazard zone. In addition, there are no residents or long-term employees that would occupy any of the Project Category 1 project sites.

Impact 4.8-8 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?

Findings: Less Than Significant Impact

Facts: All Project Category 1 projects are located on sites within the urban areas of the Six Basins project area, accessible by existing roads and supplied by existing utilities. Therefore, there is no impact associated with improvements to existing well sites.

Conclusions: TVMWD finds that due to the location of Project Category 1 project sites, no new roads, powerlines, or other infrastructure is required.

Impact 4.8-9 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?

Findings: Less Than Significant Impact

Facts: There are no occupants (residents or employees) associated with the proposed projects in this category. All Project Category 1 projects are located on sites within the urban areas of the Six Basins project area, accessible by existing roads and supplied by existing utilities. Therefore, there is no impact associated with improvements to existing well sites that would expose people or structures to significant risk of flooding or landslides due to post-fire slope instability or drainage changes.

Conclusions: TVMWD finds that there would be a less than significant impact because there are no occupants associated with Project Category 1 projects.

E.1.8 Land Use/Planning

Impact 4.10-1 Physically divide an established community.

Findings: No Impact

Facts: None of the proposed Project Category 1 projects would result in the physical division of an established community. The physical division of an established community generally refers to the construction of an interstate highway or the extension of an urban road into a rural community, construction of new railroad tracks, or permanent removal of an existing local road or bridge that would result in a reduction in mobility within an existing community or between a community and an outlying area. Therefore, there would be no impact associated with Project Category 1 projects.

Conclusions: TVWMD finds that Project Category 1 project sites are already developed with production wells and some with treatment facilities; with all sites located in developed urban area. None of the proposed projects would result in the physical division of an established community because none of the projects include the expansion of existing sites that may require the removal of residential units. Therefore, there would be no impact.

Impact 4.10-2 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?

Findings: No Impact

Facts: Project Category 1 projects would all be carried out on sites where groundwater production wells and/or treatment plants are already in place. Project Category 1 projects represent improvements/upgrades to existing wells and treatment plants, or the development of

new treatment on existing well sites. Findings for consistency with local jurisdictions plans/policies are made in Section E.2.1, *Aesthetics*, and Section E.3. *Biological Resources*, Section E.2.4, *Cultural Resources*, Section E.2 9 *Noise*, Section E.2.11 *Transportation*, where impacts would be less than significant with mitigation incorporated.

The Findings for consistency with regional or State planning documents or rules/regulations are included in the following sections: E.2.2 *Air Quality/Greenhouse Gases/Global Climate Change*, for consistency with the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP), E.2.6, *Geology/Soils/Mineral Resources/Paleontological Resources*, for consistency with the California Building Standards Code, E.2.7, *Hazards/Hazardous Materials/Airport Safety/Wildfire Hazards*, for consistency with Airport Land Use Plans, E.2.8, *Hydrology and Water Quality*, for consistency with Regional and State Water Quality Standards.

Therefore, the Land Use section of the DPEIR was limited to the analysis of the consistency of proposed Project Category 1 projects to the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategies. (RTP/SCS).

Conclusion: TVMWD finds that the analysis of the potential for Project Category 1 projects to conflict with SCAG's RTP/SCS goals for regional transportation showed that construction and operation of Project Category 1 projects would create a minimal number of trips associated with on-going operation and maintenance of wells, treatment facilities and spreading grounds. The Strategic Plan was found to be consistent with the goals of the RTP/SCS or that no inconsistencies were identified.

E.1.9 Noise

Impact 4.11-2 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?

Findings: No Impact

Facts: The Strategic Plan does not include any residential land uses, therefore implementation of Project Category 1 projects would not include any new residents that would be adversely affected by proximity to an airport or private airstrip. In addition, proposed projects identified in the Strategic Plan do not include any sites where permanent employees would be located. Once construction is complete, operation and maintenance tasks would be performed by workers working on site intermittently and not for extended periods. When on a site located within the AIA of one of the airports, workers may occasionally hear airplanes pass by overhead however, they would not be exposed to substantial, long-term airport-related noise. Therefore, the proposed projects would not expose persons to excessive airport-related noise levels.

Conclusions: TVMWD finds that no Project Category 1 project sites are located in the vicinity of a private airstrip and for those sites that are located within the jurisdiction of an Airport Land Use Compatibility Plan, no permanent employees would be present on-site. Once construction is complete, operation and maintenance tasks would be performed by workers working on site intermittently and not for extended periods. Therefore, there is no impacts associated with construction or operation of production well and treatment facilities.

E.1.10 Population and Housing

Impact 4.12-1 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)?

Findings: No Impact

Facts: Project Category 1 projects consist of upgrades to existing well sites and treatment facilities and would not require the development of any new sites. Therefore, the projects in this category would not induce substantial unplanned population growth in the area. No new homes or businesses are proposed and no new infrastructure such as new roads to access a site are proposed. Therefore, there would be no population or housing impact in the Six Basins project area associated with these projects.

Conclusions: TVMWD finds that Project Category 1 projects would not induce substantial unplanned population growth in an area, because none of the projects include new homes or businesses, and none of the Project Category 1 projects require the extension of any new infrastructure including roads. Therefore, there is no impact on population in the Six Basins project area.

Impact 4.12-2 Would the project displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere?

Findings: No Impact

Facts: Project Category 1 projects consist of upgrades to existing well sites and treatment facilities and would not require the development of any new sites that are currently occupied by residences. Therefore, the projects in this category would not require the construction of replacement housing elsewhere, and there would be no housing impact in the Six Basins project area associated with these projects.

Conclusions: TVMWD finds that all Project Category 1 projects are located on existing well sites and no additional sites are required to implement these projects. Therefore, development of Project Category 1 projects would not displace any residences or residents, and there is no impact.

E.1.11 Public Services/Recreation

Impact 4.13-2 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; or include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Findings: No Impact

Facts: There are no Project Category 1 projects that would result in any new residents or employees that would result in an increase in 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. In addition, none of the proposed projects include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Conclusions: TVWMD finds that because there are no new residents or employees associated with Project Category 1 projects, there would be no impacts to existing neighborhood and regional parks or other recreational facilities.

E.1.12 Transportation

Impact 4.14-2 Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Findings: No Impact

Facts: CEQA Guidelines Section 15064.3(b) sets forth the criteria for analyzing transportation impacts. Specifically, this section of the Guidelines focuses on land use projects and associated vehicle miles traveled. This assumes a project has either residents or employees that travel to and from a project site on a daily basis.

Upon completion of construction activities, proposed Project Category 1 projects would generate negligible vehicle miles traveled because once constructed, vehicle trips would be limited to daily site inspections and periodic scheduled maintenance requiring one or two vehicles at a site. No substantial number of daily vehicle trips are associated with Project Category 1 projects because there are no permanent residents or employees associated with project operation at any of the sites. Therefore, these projects would not conflict or be inconsistent with the intent of CEQA Guidelines Section 15063(b).

Conclusions: TVWMD finds that because there are no new residents or employees associated with Project Category 1 projects, there would be no impacts related to increases in vehicle miles traveled in the region. No substantial number of daily vehicle trips are associated with this category of projects because there are no permanent residents or employees associated with project operation at any of the sites.

E.1.13 Utilities/Service Systems/Energy

Impact 4.15-2 Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Findings: Less Than Significant Impact

Facts: The goal of the Strategic Plan for the Six Basins is to increase groundwater recharge, increase groundwater storage, improve water quality, and decrease the reliance on State supplied water within the Six Basins project area. The intent to undertake Project Category 1 projects is to upgrade existing wells and treatment facilities or develop new treatment facilities at existing well sites in order to increase groundwater production. The results would be the improvement of water quality and reliability of the local groundwater supplies, especially during dry periods, by increasing groundwater production, decreasing uncontrolled losses of sub- surface outflow to the Chino Basin and rising groundwater; and removing groundwater contaminants. Therefore, Project Category 1 projects would assist the Watermaster Parties in having sufficient water supplies

available to meet the needs within the Six Basins project area during normal, dry, and multiple dry years, resulting in a less than significant impact to water supply.

Conclusions: TVMWD finds that the intent of the Strategic Plan, and Project Category 1 projects is to increase the reliability and sustainability of groundwater within the Six Basins project area by upgrading existing groundwater production wells to increase capacity, and to upgrade or develop new treatment facilities at these sites in order to treat local groundwater to drinking water standards. Therefore, Project Category 1 projects would have a less than significant impact to the water supply.

Impact 4.15-3 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?

Findings: No Impact

Facts: Project Category 1 projects represent improvements to existing water production and/or treatment facilities. During construction of improvements at the project sites there would be no discharge to existing wastewater systems associated with the proposed projects. Portable toilets would be used at each site, and the sanitary wastes would be hauled from each site for appropriate disposal at a regional wastewater treatment facility. During operation, no employees will be working on site on a daily basis, so no restroom facilities would be required. Site inspections may occur on a daily basis where a water district or water company employee would enter the site to inspect operating conditions, but these site visits would be short, and no extended stay is anticipated that would require restroom facilities. Therefore, none of the Project Category 1 projects represent a projected demand for wastewater treatment, and there is no impact on a wastewater treatment provider's ability to serve existing commitments. During construction, portable toilets and hand wash stations would be delivered to a site and serviced (pumped and transported off site) by a professional service provider.

Conclusions: TVMWD finds that none of the Project Category 1 projects represent a projected demand for wastewater treatment, and there is no impact on a wastewater treatment provider's ability to serve existing commitments. Further, during construction, portable toilets and hand wash stations would be delivered to a site and serviced (pumped and transported off site) by a professional service provider.

Impact 4.15.5 Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Findings: Less Than Significant Impact

Facts:

Construction

The Energy Analysis prepare for the Program EIR (DPEIR Appendix H) concluded that the estimated power cost of on-site electricity usage during the construction of Strategic Plan projects is approximately $72,745.51. Additionally, based on the assumed power cost, it is

estimated that the total electricity usage during construction is calculated to be around 759,467 kWh.

Construction equipment used by the project would result in single event consumption of approximately 116,359 gallons of diesel fuel. Construction equipment use of fuel would not be atypical for the type of construction proposed because there are no aspects of the project's proposed construction process that are unusual or energy-intensive, and project construction equipment would conform to the applicable CARB emissions standards, acting to promote equipment fuel efficiencies.

CCR Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Best available control measures inform construction equipment operators of this requirement. Enforcement of idling limitations is realized through periodic site inspections conducted by City building officials, and/or in response to citizen complaints.

Construction worker trips would result in the estimated fuel consumption of 6,834 gallons. Additionally, fuel consumption from construction vendor trips will total approximately 6,590 gallons. Diesel fuel would be supplied by local and regional commercial vendors. Indirectly, construction energy efficiencies and energy conservation would be achieved through the use of bulk purchases, transport and use of construction materials. The 2019 Integrated Energy Policy Report (IEPR) released by the California Energy Commission (CEC) has shown that fuel efficiencies are getting better within on and off-road vehicle engines due to more stringent government requirements. As supported by the preceding discussions, construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

Operations

Maintenance of proposed Project Category 1 projects would include remote monitoring via Watermaster Party computer systems, meter readings, routine inspections and maintenance of facilities, periodic testing, and emergency repairs. Maintenance activities would occur on an as-needed basis (1 trip per week was assumed). The operation of a pump station (well) as well as vehicle trips by maintenance staff would require the consumption of energy resources in the form of electricity and vehicle fuels. However, electricity and fuel consumption would not be wasteful, inefficient, or unnecessary as maintenance activities would only occur as necessary for well pump operation. Therefore, no operational energy impacts would occur.

SB 100 mandates 100 percent clean electricity for California by 2045. SCE has achieved over 46 percent Carbon-Free energy sources as of the 2018 Suitability Report. As the proposed project would be powered by the existing electricity grid (SCE), the project would eventually be powered by renewable energy mandated by SB 100 (50 percent by 2026 and 100 percent by 2045) and would not conflict with the statewide plan. TVMWD, for example, has not yet adopted specific renewable energy or energy efficiency plans with which the project could comply. Nonetheless, the project would not conflict with or obstruct the State plan for renewable energy; therefore, no impact would occur.

Conclusions: TVMWD finds that in recognition of the project's objective which is to construct facilities necessary for Watermaster Parties to meet their customers' current and projected water

demands, the required energy use is not anticipated to result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

E.2 IMPACTS THAT WOULD BE LESS THAN SIGNIFICANT IMPACTS WITH IMPLEMENTATION OF MITIGATION MEASURES IDENTIFIED IN THE FPEIR FOR PROJECT CATEGORY 1 PROJECTS

E.2.1 Aesthetics

Impact 4.1-1 Have a substantial adverse effect on a scenic vista.

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: To ensure that improvements to existing facilities would result in a less than significant impact on a scenic vista, the Watermaster Party proposing a Project Category 1 project shall consult with the relevant city or county Planning or Development Services Department for review of plans including construction drawings, site plans, landscape plans etc., typically required of a development application. Facility/site plans shall be designed in coordination with local jurisdictions, to the extent feasible taking into consideration the needs of the project as set forth in mitigation measure AES-1.

Mitigation Measures

AES-1 Proposed facilities, including walls, gates, treatment facilities, etc., shall be designed in accordance with local design standards in order to be complementary to the local area. Landscaping shall be installed and maintained in conformance with local landscaping design guidelines as appropriate to screen views of new facilities from surrounding areas to the extent feasible taking into consideration the needs of the project and except where such compliance is not required by California law.

Conclusions: TVMWD finds that implementation of mitigation measure AES-1 can reduce potential adverse aesthetics impacts to a level of less than significant. This measure would minimize impacts to scenic vistas by working with the local jurisdiction to meet local design standards to the extent feasible taking into consideration the needs of the project. Coordination with local jurisdictions to design proposed facilities consistent with local design standards would result in a less than significant impact to scenic vistas.

Impact 4.1-3 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 a 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?

Findings: Less than Significant Impact with Mitigation Incorporated

Facts: Project Category 1 projects consist of upgrades to existing well sites and treatment facilities that would not require the development of any new sites. To ensure that improvements would result in a less than significant impact on a visual character or quality of public views, a Watermaster Party proposing such upgrades to existing sites would consult with the appropriate

city staff through a city's Development Review process that would include review of plans including construction drawings, site plans, landscape plans etc., typically required of a development application. Mitigation measure AES-1 requires a project applicant to design a facility/site in coordination with local jurisdictions to reduce potential visual effects, to the extent feasible taking into consideration the needs of the project and except where compliance is not required by law.

Mitigation Measures

See Findings and Facts under Impact 4.1-1 mitigation measure AES-1 above.

Conclusions: TVMWD finds that implementation of mitigation measure AES-1 can reduce potential adverse impacts on the existing visual character or quality of public views to a level of less than significant. This measure would minimize impacts to scenic vistas by working with the local jurisdiction to meet local design standards. Design of proposed facilities consistent with local design standards to the extent feasible taking into account the needs of the project would result in a less than significant impact to visual character and public views.

Impact 4.1-4 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Findings: Less than Significant Impact with Mitigation Incorporated

Facts: Project Category 1 project sites are located within an urban area developed with residential, commercial, or industrial uses. Implementation of projects within this category may result in new exterior nighttime lighting for operational and security purposes within the existing site. The increase in lighting may result in lighting spilling over onto adjacent sites. Therefore, increased lighting within an existing site represents a potentially significant lighting impact. In addition, during construction, lighting may be required intermittently if work crews must work after dark to complete a task.

As individual projects are proposed, the Watermaster Party proposing the project would coordinate with development services or planning staff of the respective city or county to ascertain site development requirements including height and location of light poles, types of building materials (non-reflective), and landscaping (i.e., trees for screening the site if applicable). Mitigation measures AES-2 through AES-4 have been identified to address the potential for light and glare to adversely affect adjacent properties. These measures would be implemented to the extent feasible taking into consideration the needs of the project. Compliance with these measures would ensure that impacts associated with light, and glare would be less than significant.

Mitigation Measures

AES-2 To avoid any light intrusion to surrounding land uses, on project sites where permanent exterior lighting is proposed, lights shall be shielded and directed downward and toward the interior of a site. The maximum light allowed beyond the property boundary adjacent

to sensitive light receptors shall be as stipulated in local design guidelines or development code and except where such compliance is not required by California law.

AES-3 Development of Strategic Plan projects shall comply with existing and future lighting ordinances, to the extent feasible to taking into consideration the needs of the project.

AES-4 Any new structures that may require large facades shall not be constructed using highly reflective building materials.

Conclusions: TVMWD finds that implementation of mitigation measures AES-2 through AES-4 can reduce potential adverse impacts associated with new light and glare to a level of less than significant. Design of proposed facilities consistent with local design standards would result in a less than significant impact to visual character and public views to the extent feasible taking into consideration the needs of the project.

E.2.2 Air Quality/Greenhouse Gas Emissions

Impact 4.3-1 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?

Findings: Less Than Significant with Mitigation Incorporated

Facts: Because the Strategic Plan is a long-range plan (20 years), it is unknown when projects would be developed during this period. Therefore, to provide a worst-case analysis of air emissions, the Strategic Plan's *Air Quality Impact Analysis* (DPEIR Appendix B1) assumed a one-year construction period that would include the development of the following: (1) the construction of a treatment facility with related infrastructure (Project Category 1); (2) up to 8,500 linear feet of pipeline construction (Project Category 3); and (3) the construction of the San Antonio Spreading Grounds would occur. Construction of the spreading grounds includes the disturbance approximately 50 acres to a depth of up to 200 feet, and the removal of approximately 2.5 million tons (approximately 1.79 million cubic yards) of aggregate material that would be conveyed across the SASG to the existing Holliday Rock aggregate mine site east of the San Antonio Creek channel (Project Category 2).

For purposes of analysis of air emissions, construction of these projects is expected over an approximately 13- period. Construction duration utilized in the analysis represents a "worst-case" analysis should construction occur any time after the respective dates since emission factors for construction decrease as the analysis year increases.

Construction Impacts

The estimated maximum daily construction emissions with implementation of mitigation measures are summarized on Table 1, *Overall Construction Emissions Summary (With Mitigation)*. Under the assumed scenario emissions resulting from construction activities would not exceed criteria pollutant thresholds established by the South Coast Air Quality Management District (SCAQMD) for emissions of any criteria pollutant. This conclusion assumes compliance with all

applicable SCAQMD Rules for construction activities. Mitigation measures AQ-1 through AQ-4 shall be implemented during construction activities at project sites.

Mitigation Measures

AQ-1 Construction contractors at each project site shall adhere to applicable measures contained in Rule 403 Table of including, but not limited to:

- All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions.
- The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at least three (3) times daily during dry weather.
- Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the mid-morning, afternoon, and after work is done for the day.
- The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are limited to 15 miles per hour or less.

AQ-2 Regarding emissions of NOx and VOC, when using construction equipment greater than 150 horsepower (>150 HP), the Construction Contractor shall ensure that off-road diesel construction equipment complies with EPA/CARB Tier 4 emissions standards or equivalent and shall ensure that all construction equipment is tuned and maintained in accordance with the manufacturer's specifications.

Table 1 Overall Construction Emissions Summary (with Mitigation)

Year	Emissions (lbs/day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
Summer						
2021	2.96	35.61	41.89	0.08	4.55	2.73
2022	2.76	33.70	41.65	0.08	4.41	2.60
Winter						
2021	2.98	35.62	41.80	0.08	4.55	2.73
2022	2.78	33.71	41.56	0.08	4.41	2.60
Maximum Daily Emissions	2.98	35.62	41.89	0.08	4.55	2.73
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: Urban Crossroads, Six Basins, Air Quality Impact Analysis, Cities of Claremont, La Verne, Pomona, and Upland, and the County of Los Angeles, Six Basins Watermaster, February 2021, Table 3-4.

Notes: 1 The mitigated CalEEMod regional construction-source emissions are presented in Appendix 3.2 of the Air Quality Report included in Appendix B of the Program EIR.

AQ-3 SCAQMD Rule 403-Table 1 lists a number of Best Available Control Technologies (BACT) that may apply to the construction of Strategic Plan projects. On a project-by-project basis, SCAQMD Rule 403 Table 1 shall be reviewed, and appropriate measures incorporated into a project specific monitoring program.

Operations Impacts

Mobile Source Emissions

Long-term air quality impacts occur from mobile source emission generated from project-related traffic and from stationary source emissions generated from natural gas. The proposed Strategic Plan projects primarily involve construction activities. For on-going operations, mobile emissions would be generated by the motor vehicles traveling to and from project sites during frequent inspections (daily or weekly) and periodic maintenance. These trips are not anticipated to be lengthy and would not result in any substantive new long-term emissions sources.

Stationary Source Emissions

Stationary energy emissions would result from energy consumption associated with the proposed wells (production and monitoring) and treatment facilities. All pumps and generators associated with these projects would be electrically powered and would not directly generate air emissions. However, the *Air Quality Impact Analysis* assumed that well sites would include the use of an emergency diesel generator, allowing the well pump to run on backup power in case of emergency. If a backup generator would be installed, the lead agency would be required to obtain the applicable permits from SCAQMD for construction and operation of such equipment. Backup generators, if used, would be used only in emergency situations and for routine testing and maintenance purposes and would not contribute a substantial amount of emissions capable of exceeding SCAQMD thresholds. As the operations of proposed Strategic Plan projects would not exceed SCAQMD thresholds, their operation would not violate an air quality standard or contribute to an existing violation. Therefore, project operations would not result in a cumulatively considerable net increase of any criteria pollutant and impacts would be less than significant.

Conclusions: TVMWD finds that construction and operation of Strategic Plan projects, would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in non-attainment. Backup generators would be used only in emergency situations and for routine testing and maintenance purposes and would not contribute a substantial amount of emissions capable of exceeding SCAQMD thresholds. As project operations would not exceed SCAQMD thresholds, the project would not violate an air quality standard or contribute to an existing violation. Therefore, project operations would not result in a cumulatively considerable net increase of any criteria pollutant and impacts would be less than significant.

Impact 4.3-2 Expose sensitive receptors to substantial pollutant concentrations?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts:

Construction

Consistent with SCAQMD's LST Methodology, a 25-meter receptor distance was utilized in the Air Quality analysis for the set of projects representing the Strategic Plan and provides for a conservative i.e., "health protective" standard of care. The SCAQMD's screening look-up tables were used to determine project impacts. It should be noted that since the look-up tables identify

thresholds at only 1 acre, 2 acres, and 5 acres, linear regression was utilized, consistent with SCAQMD guidance, in order to interpolate the threshold values for the other disturbed acreage and distances not identified in the look-up tables. The assumption was made that the proposed construction activities could actively disturb approximately 1 acre per day.

The LST analysis showed that without mitigation, localized construction emissions would exceed the applicable SCAQMD LSTs for emissions of PM10. However, after implementation of mitigation measures AQ-1 through AQ-3, construction-source emissions would not exceed the applicable SCAQMD LSTs thresholds and would be less-than-significant.

Operations

LSTs would apply to the operational phase of a proposed project if the project includes stationary sources or attracts mobile sources that may spend extended periods queuing and idling at the site (e.g., warehouse or solid waste transfer facilities). As previously discussed, proposed Strategic Plan projects would generate a nominal number of traffic trips in the context of on-going maintenance resulting in a negligible amount of new mobile source emissions. Additionally, all well pumps associated with the project (production and monitoring) were assumed to be electrically powered and would not directly generate air emissions. However, some projects may include the use of an emergency diesel generator, allowing a well pump to run on backup power in case of emergency. If a backup generator is installed, the lead agency would be required to obtain the applicable permits from SCAQMD for operation of such equipment. Upon compliance with SCAQMD permitting procedures, localized emissions from any potential diesel generator would not result in substantial pollutant concentrations capable of exceeding operational LST thresholds. Therefore, proposed Strategic Plan projects would not expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant.

Mitigation Measures

See Findings and Facts under Impact 4.3-1, mitigation measures AQ-1 through AQ-3.

Conclusions: TVMWD finds that construction and operation of Strategic Plan projects, would not result in the exposure of sensitive receptors to substantial pollutant concentrations with iimplementation of mitigation measures AQ-1 through AQ-3. This will ensure that the generation of fugitive dust (PM10) and other pollutants during construction would remain at levels that are less than significant. During operation, backup generators (if installed) would be used only in emergency situations and for routine testing and maintenance purposes and would not contribute a substantial amount of emissions capable of exceeding SCAQMD thresholds. Further, TVMWD finds that as project operations would not exceed SCAQMD thresholds, the project would not violate an air quality standard or contribute to an existing violation. Therefore, project operations would not result in the exposure of sensitive receptors to substantial pollutant concentrations that are above SCAQMD's LST thresholds.

Impact 4.3-4 Conflict with or obstruct implementation of the applicable air quality plan?

Findings: Less Than Significant with Mitigation Incorporated

Facts: The project's consistency with the SCAQMD Air Quality Management Plan (AQMP) was determined using the 2016 AQMP.

Consistency Criterion No. 1: The proposed Strategic Plan projects would not 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.

The violations that Consistency Criterion No. 1 are related to the California Ambient Air Quality Standards (SCAAQS) and the National Ambient Air Quality Standards (NAAQS). CAAQS and NAAQS violations would occur if regional or localized significance thresholds were exceeded. The project would not exceed the applicable LST thresholds or regional significance thresholds for construction activity after implementation of applicable mitigation measures (AQ-1 through AQ-3). Therefore, implementation of Strategic Plan projects would not conflict with the AQMP according to this criterion.

Consistency Criterion No. 2: The proposed Strategic Plan projects would not exceed the assumptions in the AQMP based on the years of Project build-out phase.

The 2016 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the Air Basin are provided to SCAG, which develops regional growth forecasts, that are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in the adopted general plans for the cities of Claremont, La Verne, Pomona, Upland and the counties of Los Angeles and San Bernardino is considered to be consistent with the AQMP.

Peak day emissions generated by construction activities are largely independent of land use assignments, but rather are a function of development scope and maximum area of disturbance. Regardless of a site's land use designation, each Strategic Plan project site was assumed to be designed to its maximum potential, with disturbance of the entire site occurring during construction activities. This assumption allows the analysis of a worst-case scenario for the construction of Strategic Plan projects. On the basis of the preceding discussion, proposed Strategic Plan projects were determined to be consistent with the second criterion.

Mitigation Measures

See Findings and Facts under Impact 4.3-1, mitigation measures AQ-1 through AQ-3.

Conclusions: TVMWD finds that the construction and operation of proposed Strategic Plan projects would not result in or cause NAAQS or CAAQS violations with implementation of mitigation measures AQ-1 through AQ-3. The Watermaster Parties are not proposing land uses that would result in the generation of excessive criteria pollutants either during construction or operation. The proposed Strategic Plan projects are therefore considered to be consistent with the AQMP.

Impact 4.3-5 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Findings: Less Than Significant with Mitigation Incorporated

Facts:

Construction

Project construction actvities would generate carbon dioxide (CO2), methane (CH4) and nitrous oxide (N2O) emissions. The annual GHG emissions associated with the construction of the proposed Strategic Plan projects are summarized in Table 2, *Project GHG Emissions*.

Table 2 Project GHG Emissions

Emission Source	Emissions (MT/yr)			
	CO2	CH4	N2O	Total CO_2e
Annual construction-related emissions	1,214.79	0.30	0.00	1,222.28
Total CO_2e (All Sources)	1,222.28			

Source: Urban Crossroads, Six Basins, Greenhouse Gas Impact Analysis, Cities of Claremont, La Verne, Pomona, and Upland, and the County of Los Angeles, Six Basins Watermaster, February 2021, Table 3-1.

The table shows that construction would generate a total of approximately 1,222.28 $MTCO_2e/yr$. The analysis assumed the implementation of Air Quality mitigation measures (AQ-1 through AQ-3) during construction. As such, with mitigation, the project would not exceed the SCAQMD's recommended numeric threshold of 3,000 $MTCO_2e/yr$ if it were applied. Thus, project-related emissions associated with the construction scenario used to analyze air quality would not have a significant direct or indirect impact on GHG and climate change and no mitigation or further analysis is required.

Operations

In terms of operational GHG emissions, the proposed Strategic Plan projects do not include any substantive new stationary or mobile sources of emissions, and therefore, by its very nature, will not generate quantifiable GHG emissions during operations of the projects. There are no buildings, other than small buildings to house the well pumps and related monitoring equipment and electrical room. Therefore, there would be no permanent source or stationary source emissions. While it is anticipated that projects would require intermittent maintenance to be efficient, such maintenance would be minimal requiring a negligible amount of traffic trips on an annual basis. Therefore, there is no significant operational impacts related to the generation of GHGs.

Mitigation Measures

See Findings and Facts under Impact 4.3-1, mitigation measures AQ-1 through AQ-3.

Conclusions: TVMWD finds that the construction of proposed Strategic Plan projects would not exceed the SCAQMD's recommended numeric threshold of 3,000 $MTCO_2e/yr$ if it were applied with implementation of mitigation measures AQ-1 through AQ-3 for the control of construction related GHG emissions. Likewise, new facilities including well pumps and treatment facilities would run on electricity obtained from the grid. Therefore, operation of Strategic Plan projects would not exceed the SCAQMD's recommended numeric threshold.

Impact 4.3-6 Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: As discussed above in Impact 4.3-5, proposed Strategic Plan projects generally consist of construction activity and do not include trip-generating land uses (residential. commercial, industrial) or facilities that would generate any substantive amount of on-going GHG emissions. As presented in Table 2, short-term GHG emissions associated with the 13-month construction schedule for the three projects selected to represent a worst-case scenario, are below the 3,000 MTCO2e/year screening threshold. Therefore, the proposed projects would not generate a significant amount of GHG emissions. The proposed Strategic Plan projects would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Impacts are less than significant in this regard.

Mitigation Measures

See Findings and Facts under Impact 4.3-1, mitigation measures AQ-1 through AQ-3.

Conclusions: TVMWD finds that the construction of proposed Strategic Plan projects would not exceed the SCAQMD's recommended numeric threshold of 3,000 $MTCO_2e/yr$ if it were applied with implementation of mitigation measures AQ-1 through AQ-3 for the control of construction related GHG emissions. Likewise, Project Category 1 facilities including well pumps and treatment facilities would run on electricity obtained from the grid. Therefore, operation of Project Category projects would not exceed the SCAQMD's recommended numeric threshold.

E.2.3 Biological Resources

Impact 4.4-1 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.

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Construction of a new treatment facility or upgrades to existing wells may require trimming the existing trees or shrubs. Two of the Project Category 1 project sites – Reservoir 5 and Durward 2 - do not have vegetation on site. The Reservoir 5 site is devoid of vegetation so no habitat that would be modified and the site is enclosed by perimeter fencing/walls. Therefore, proposed improvements at the Reservoir 5 site would not result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species. Likewise, proposed improvements at the Durward 2 site would be either underground or at ground level typical of a well site. There is no habitat that would be modified. Therefore, proposed improvements at the Durward 2 site would not result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species. Similarly, the area in the P-20 well site where the new treatment facility would be built does not contain vegetation.

The remaining Project Category 1 project sites Lincoln/Mills, Old Baldy, and Del Monte 4 are located on smaller sites with mature landscaping that has the potential to provide opportunities

for nesting birds. Depending on the time of year, construction activities, including tree trimming, may require a pre-construction nesting bird survey. Mitigation measure BIO-1 addresses how a Watermaster Party or construction contractor would coordinate with the local agency prior to tree trimming or removal. Mitigation measure BIO-2 addresses the requirement for sites identified in the Strategic Plan where nesting birds may be adversely affected by construction activities. Implementation of Mitigation measures BIO-1 and BIO-2 would ensure that potential impacts on nesting birds would be less than significant. In summary, mitigation measures BIO-1 and BIO-2 would apply to three of the Project Category 1 project sites – Lincoln/Mills, Old Baldy, and Del Monte 4. Implementation of mitigation measure BIO-1 and BIO-2 would ensure that potential impacts on nesting birds would be less than significant.

Mitigation Measures

BIO-1a *Tree Removal*. Prior to the trimming or removal of a tree at any project site, a project proponent will coordinate with the local agency to determine if the particular trees targeted for trimming or removal are heritage trees regulated by local agency. If the targeted tree is a heritage under the City or County Regulations, the appropriated application will be submitted and approved by the local agency prior to conducting the trimming or removal of the heritage tree(s), except where compliance is not required by California law.

For other trees, including native trees that may be impacted by a Strategic Plan project, the Watermaster Party proposing a project shall hire a qualified arborist to assess the health of a tree(s) and determine whether trimming a tree would prove detrimental to the tree. In such a case, or if a tree is removed, replacement of trees shall be required, and new trees shall be native trees whether the tree removed is native or non-native.

BIO-1b Prior to commencement of ground disturbing activities where native trees may require trimming or removal), and to address the potential spread of invasive pests and diseases by implementing the following:

1) Prior to tree trimming or removal, a certified arborist shall evaluate trees for infectious tree diseases including but not limited to sudden oak death (*Phytophthora ramorum*), thousand canker fungus (*Geosmithia morbida*), polyphagous shot hole borer (*Euwallacea* spp.), and goldspotted oak borer (*Agrilus auroguttatus*) (TCD 2021; UCANR 2021; Phytosphere Research 2012; UCIPM 2013).

2) If a certified arborist determines trees are impacted by infectious pests or diseases, the certified arborist shall prepare an *Infectious Tree Disease Management Plan* or develop a detailed, robust, enforceable, and feasible list of preventative measures. A plan/list shall provide measures relevant for each tree pest or disease observed. To avoid the spread of infectious tree pests and diseases, infected trees should not be transported from a project area without first being treated using best available management practices described in the *Infectious Tree Disease Management Plan* or list of preventative measures.

3) If possible, all tree material, especially infected tree material, shall be left on site. The material could be chipped for use as ground cover or mulch. Pruning and power tools should be cleaned and disinfected before use to prevent introducing pathogens

from known infested areas, and after use to prevent spread of pathogens to new areas.

BIO-2 *Nesting Birds*. Removal of any trees, shrubs, or any other potential nesting habitat shall be conducted outside the avian nesting season, as verified by a qualified Avian Biologist. The nesting season generally extends from February 1 through August 31, but it can vary slightly from year to year based on seasonal weather conditions. If ground disturbance and vegetation removal cannot occur outside of the qualified Avian Biologist's-verified nesting season, a preconstruction clearance survey for nesting birds shall be conducted within 30 days of the start of any construction. If no active nests are found, no further action would be required. If an active nest is found, the biologist shall set appropriate no-work buffers around the nest, which would be determined based on the nesting species, its sensitivity to disturbance, nesting stage and expected types, intensity, and duration of disturbance. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved no-work buffer zone shall be clearly marked in the field, within which no disturbance activity shall commence until the qualified biologist has determined the young birds have successfully fledged and the nest is inactive.

Conclusions: TVMWD finds that construction of a new treatment facility may require trimming the existing trees or shrubs. Depending on the time of year, this activity may require a pre-construction nesting bird survey. Mitigation measures BIO-1a, BIO1b, and BIO-2 would apply to – Lincoln/Mills, Old Baldy, and Del Monte 4. Implementation of mitigation measures BIO-1 and BIO-2 would ensure that potential impacts on nesting birds would be less than significant.

Impact 4.4-4 Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Watermaster Parties with existing facilities have worked with local jurisdictions to mitigate potential impacts on the surrounding neighborhoods through compliance with standards and requirements set forth by State agencies and regional agencies (e.g., SCAQMD and RWQCB), for impacts related to air quality, noise, and control of stormwater. Regarding mature trees at or adjacent to existing facilities, Watermaster Parties performing maintenance at their facilities have had to occasionally trim or remove trees in order to continue operation at their well sites. In order to continue to be "good neighbors" mitigation measures BIO-1a, BIO-1b and BIO-2 are intended to comply with State California Department of Fish and Wildlife requirements regarding nesting birds and are also intended to allow Watermaster Parties the flexibility to operate facilities in a safe and efficient manner while still being "good neighbors".

Mitigation Measures

See Findings and Facts under Impact 4.4-1, mitigation measures BIO-1a, BIO-1b and BIO-2.

Conclusions: TVMWD finds that construction of a new treatment facility or upgrades to existing wells may require trimming the existing trees or shrubs. Depending on the time of year, this activity may require a pre-construction nesting bird survey. Mitigation measures BIO-1a, BIO-1b, and BIO-2 would apply to three Project Category 1 project sites – Lincoln/Mills, Old Baldy, and

Del Monte 4. Implementation of these mitigation measures would ensure that potential impacts on nesting birds would be less than significant.

E.2.4 Cultural Resources/Tribal Cultural Resources

Impact 4.5-1 Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5, Determining the Significance to Archaeological and Historical Resources?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Project Category 1 projects are all being proposed at sites that are currently developed with wells and/or treatment facilities. Some of the existing sites may be older than 45 years. The 45-year rule is used due to the anticipated length of time a project may be in planning/design before construction begins and is meant to prevent last minute problems with resources that have become 50 years old and are therefore historic under State and federal laws. Therefore, to ensure that proposed projects on existing sites comply with this requirement, mitigation measures CUL-1 requires the project proponent (Watermaster Party) to hire a qualified historian or architectural historian meeting the Secretary of the Interior's Standards for Architectural History if existing facilities at Project Category 1 project sites are at least 45 years in age. If facilities at a project site are determined to be greater than 45 years in age and it is determined that such facilities represent an historic resource, a treatment plan shall be prepared prior to demolition or substantial alteration of such resources.

There is a potential destruction of unknown prehistoric and historical archaeological resources during site disturbance. Although the potential to recover of unknown resources at these project sites is low due to previous site disturbance, the possibility exists that excavation or trenching activities may uncover such resources. Therefore, mitigation measure CUL-2 requires each of the Watermaster Parties to hire a qualified archeologist to review site/construction plans, conduct a site visit, and determine whether monitoring would be required.

The potential to disturb Native American human remains may occur where excavation or trenching activities are proposed. However, should construction activity result in the disturbance of human remains, mitigation measure CUL-3 would be implemented. This requires that the construction contractor stop work in the area and contact the Coroner.

Mitigation Measures

CUL-1 Prior to approval of a project identified under Project Categories 1 through 3, Watermaster Party undertaking a project shall retain a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology to conduct an assessment of the project site and vicinity for all project elements that involve ground disturbance. The archaeologist shall conduct cultural resources assessment consisting of: (1) a cultural resources records search to be conducted at the South Central Coastal Information Center located at California State University Fullerton; (2) consultation with the Native American Heritage Commission (NAHC) and with interested Native American tribes identified by NAHC; (3) a field survey by the archaeologist; and (4) recordation of all identified archaeological resources located on a project site on California Department of Parks and Recreation 523 Site

Record forms. The archaeologist shall provide recommendations regarding resource significance and additional work for those resources that may be affected by a project.

CUL-2 Prior to ground disturbance activities at a project site that contain structures 45 years old or older, affected structure(s) shall be subject to a historic built environment survey, and potentially historic structures shall be evaluated for their potential historic significance, prior to a Watermaster Party's finalization of design/site plans. The survey shall be carried out by a qualified historian or architectural historian meeting the Secretary of the Interior's Standards for Architectural History. If potentially significant resources are encountered during the survey, a treatment plan shall be prepared prior to demolition or substantial alteration of such resources identified.

CUL-3 In the event that human remains are uncovered at a project site, there shall be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlie adjacent human remains until:

- The coroner of the county in which the remains are discovered must be contacted to determine that no investigation of the cause of death is required, and
- If the coroner determines the remains to be Native American:
  - The coroner shall contact the Native American Heritage Commission within 24 hours.
  - The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American.
  - The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains, and any associated grave goods as provided in Public Resources Code Section 5097.98.
- Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance.
  - The Native American Heritage Commission is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 24 hours after being notified by the commission.
  - The descendant identified fails to make a recommendation; or
  - The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.

Conclusions: TVMWD finds that implementation of mitigation measures CUL-1 through CUL-3 can reduce potential impacts to historical resources pursuant to Section 15064.5, or unknown subsurface historical resources to a less than significant impact level for Project Category 1 projects. The above measures can be implemented without causing additional adverse environmental impacts. Mitigation measures CUL-1 through CUL-3 will be integrated into the future development activities without additional impacts on the environment.

Impact 4.5-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: See Findings of Facts under Impact 4.5-1 above.

Mitigation Measures

See Findings of Facts under Impact 4.5-1, mitigation measures CUL-1 through CUL-3.

Conclusions: TVMWD finds that implementation of the mitigation measures CUL-1 through CUL-3 can reduce potential impacts to archaeological resources pursuant to Section 15064.5, or unknown subsurface archaeological resources to a less than significant impact level for Project Category 1 projects. The above measures can be implemented without causing additional adverse environmental impacts. Mitigation measures CUL-1 through CUL-3 will be integrated into the future development activities without additional impacts on the environment.

Impact 4.5-3 Disturb any human remains, including those interred outside of formal cemeteries?

Findings: Less Than Significant with Mitigation Incorporated

Facts: See Findings and Facts under Impact 4.5-1 above.

Mitigation Measures

See Findings of Facts under Impact 4.5-1 mitigation measure CUL-3.

Conclusions: TVMWD finds that implementation of mitigation measure CUL-3 would reduce potential impacts to unknown human remains to a less than significant impact level. The Watermaster Party proposing a Project Category 1 project shall comply with provisions of state law regarding discovery of human remains, including PRC Section 5097.98 and Health and Safety Code Section 7050.5. Mitigation measure CUL-3 shall be integrated into the future development activities for Project Category 1 projects without additional impacts on the environment.

Impact 4.5-4 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).

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: There are no Project Category 1 project sites that are listed or eligible for listing on the California Register of Historical Resources, or in a local register of historical resources. However, some of these sites contain facilities that may be over 45 years old, and thus may be eligible to be listed as historic resources. Therefore, to ensure that proposed projects on existing sites comply with the requirement to consider projects that may affect facilities over 45 years in age, mitigation measure CUL-1 shall be implemented. If potentially significant resources are encountered during the survey, mitigation measure CUL-2 shall be implemented.

Mitigation Measures

See Findings and Facts under Impact 4.5-1 for mitigation measures CUL-1 and CUL-2.

Conclusions: TVMWD finds that implementation of mitigation measures CUL-1 and CUL-2 can reduce potential impacts to historical resources, or unknown subsurface historical resources to a less than significant impact level for Project Category 1 projects. These measures can be implemented without causing additional adverse environmental impacts. Mitigation measures CUL-1 and CUL-2 will be integrated into the future development activities without additional impacts on the environment.

Impact 4.4-5 A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: TVMWD completed the requirements for tribal consultation pursuant to Assembly Bill 52 (AB 52) in 2020. In response to TVMWD's request for consultation, representatives of two tribes responded. These were the Morongo Band of Mission Indians and the San Manuel Band of Mission Indians (SMBMI). The Morongo representative indicated that there was no additional information to provide to TVMWD at that time, and no consultation was requested. The SMBMI representative requested consultation which consisted of providing the representative with (1) a copy of the Strategic Plan's Cultural Resources Due Diligence Report (literature and desktop searches), (2) the Notice of Preparation of the Program EIR, and (3) a number of exhibits identifying the locations of the projects identified in the Strategic Plan. On June 25, 2020, after additional discussion, the SMBMI representative concluded that her questions had been answered and that it was understood that at such time as TVMWD or other Watermaster Party came forward with a Strategic Plan project, the lead agency for such a project would undertake AB 52 consultation. The representative acknowledged that as of that date SMBMI considered CEQA consultation for this Six Basins Strategic Plan concluded. No other Native American tribes responded to the request for consultation.

Because the EIR prepared for the Strategic Plan was programmatic, individual project sites were not assessed for potential site-specific impacts. Instead, the Cultural Resources Due Diligence Report consisted of literature and desktop searches, including review of previous Cultural Resources reports for development projects proposed in cities within the vicinity of the Six Basins project area. Therefore, at such time as TVMWD or other Watermaster Party proposes a Project Category 1 project, a site-specific Cultural Resources Assessment shall be prepared consisting of a literature search and site survey. In addition, the Watermaster Party or designated project archaeologist for a project shall contact the Native American Heritage Commission (NAHC) who will provide a list of Native American tribes that should be contacted for AB 52 consultation. Individual tribal representatives will determine whether a Project Category 1 project warrants consultation.

Mitigation measure CUL-4 shall be implemented prior to approval of a project per the requirements of Public Resources Code Section 21084.3. The intent is to minimize adverse impacts to tribal cultural resources to the satisfaction of the lead agency and the Native American tribe that requested consultation under AB 52.

Mitigation Measures

CUL-4 Prior to approval of a project, the Watermaster Party undertaking the project shall conduct AB 52 consultation with Native American tribes based on a list provided by the NAHC. If the lead agency determines that a project may cause a substantial adverse change to a tribal cultural resource, identified through project-specific AB 52 consultation, and measures are not otherwise identified in the consultation process required under PRC Section 21080.3.2, Watermaster Parties shall implement the following measures where feasible and necessary to address site specific impacts to avoid or minimize the significant adverse impacts:

- Avoidance and preservation of the resources in place, including, but not limited to planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
  - Protecting the cultural character and integrity of the resource
  - Protecting the traditional use of the resource
  - Protecting the confidentiality of the resource
- Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- Protecting the resource.

Conclusions: TVMWD finds that construction activities may have the potential to affect significant historic-period archaeological resources, tribal cultural resources, and/or human remains; and thus, construction impacts on historical, archaeological, and tribal cultural resources, as well as human remains, could be significant. However, implementation of mitigation measure CUL-1 through CUL-4 would ensure that impacts associated with these impacts would be less than significant during construction.

TVMWD further finds that operations of the Project Category 1 projects would not involve earthmoving activities, facility upgrades, and other demolition. Regular maintenance activities would be completed as part of the operation of all facilities and may include activities such as vegetation clearance or facility repairs. Such activities are expected to be limited to previously disturbed areas; therefore, operation of the proposed Strategic Plan projects is not expected to affect significant historic-period archaeological resources, tribal cultural resources, and/or human remains. Operations and maintenance impacts on historical, archaeological, and tribal cultural resources, as well as human remains, would be less than significant.

E.2.5 Environmental Justice

Impact 4.6-1 Result in a disproportionate human health or significant environmental impact on minority and/or low-income populations?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: The analysis of the Strategic Plan's potential adverse effects on minority and low-income populations has been undertaken in compliance with Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority and Low-Income Populations*. This order requires federal agencies – as part of their due diligence under the National Environmental Policy Act (NEPA) – to assess the potential for the proposed action to have a disproportionately high and adverse environmental and health impacts on minority and low-income populations. An analysis of the Strategic Plan's potential adverse effects on minority and low-income populations is required as part of the Program EIR because some Strategic Plan projects may be funded through the Clean Water State Revolving Fund (CWSRF) Program that is administered by the State Water Resources Control Board (SWRCB) and partially funded by the US Environmental Protection Agency (EPA). The purpose of the CWSRF Program is to implement the federal Clean Water Act and other State laws by providing low-interest financing for construction of new or improvements to existing water supply and water treatment facilities. The Strategic Plan identifies a number of projects that qualify to participate in the CWSRF Program that are deemed projects under CEQA but because of the federal nexus with the EPA, must also meet federal environmental laws and regulations, including an analysis of the potential adverse environmental and health impacts on minority and low-income populations.

For the Six Basins Strategic Plan, the environmental impacts most likely to adversely affect minority and low-income populations are related to Air Quality/GHG/Global Climate Change, Hazards and Hazardous Materials, Hydrology and Water Quality, and Transportation (related to emergency access).

Air Quality/Greenhouse Gas Emissions/Global Climate Change

SCAQMD established Localized Significance Thresholds (LST) in response to its Governing Board's Environmental Justice Initiative I-4. The purpose of SCAQMD's Environmental Justice program is to ensure that everyone has the right to equal protection from air pollution and fair access to the decision-making process that works to improve the quality of air within their communities. LSTs were developed in response to environmental justice and health concerns raised by the public regarding exposure of individuals to criteria pollutants in local communities. To address the issue of localized significance, SCAQMD adopted LSTs that show whether a project would cause or contribute to localized air quality impacts and thereby cause or contribute to potential localized adverse health effects. Because the Strategic Plan is a long-range plan (20 years), it is unknown when projects would be developed during this period. Therefore, to provide a worst-case analysis of air emissions, the Strategic Plan's *Air Quality Impact Analysis* assumed an approximately 13-month construction period that would include the development of the following:

- the construction of a treatment facility with related infrastructure (Project Category 1;
- up to 8,500 linear feet of pipeline construction (Project Category 3); and
- the construction of the San Antonio Spreading Grounds would occur. Construction of the spreading grounds includes the disturbance approximately 50 acres to a depth of up to 200 feet, and the removal of 2.5 million tons of aggregate material that would be conveyed across the SASG to the existing Holliday Rock aggregate mine site east of the San Antonio Creek channel (Project Category 2).
    - Construction duration utilized in the analysis represents a "worst-case" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as the analysis year increases.

The LST analysis showed that without mitigation, localized construction emissions would exceed the applicable SCAQMD LSTs for emissions of PM10. However, with mitigation construction-source emissions would not exceed the applicable SCAQMD LSTs thresholds and would be less-than-significant. Mitigation measure AQ-1 requires compliance with SCAQMD fugitive dust control requirements and mitigation measure AQ-2 requires that off-road diesel construction equipment that also generates particulate matter complies with EPA/CARB Tier 4 emissions standards or equivalent and shall ensure that all construction equipment is tuned and maintained in accordance with the manufacturer's specifications.

Mitigation Measures

See Findings and Facts under Section E.2.2, *Impact 4.3-1 for* mitigation measures AQ-1 and AQ-2.

Conclusions: TVMWD finds that implementation of Strategic Plan projects would not disproportionately affect air quality in existing minority or low-income communities with implementation of mitigation measures AQ-1 and AQ-2 requiring compliance with SCAQMD rules for the control of emissions.

Hazards and Hazardous Materials/Airport Safety/Wildfire Hazards

Hazards/Hazardous Materials

The focus of the EIR analysis associated with Strategic Plan projects was on hazards and hazardous material associated with groundwater contamination and high groundwater levels in the Six Basins project area and how it affects overlying census tracts. There are three sites that have contributed the most to groundwater contamination in the southwesterly basins in the Six Basins project area (other sites in the project area have also contributed but to a lesser extent). The sites are: (1) former Xerox Corporation site in Pomona: (2) former Victor Graphic site at in La Verne; and (3) former United Production Services in La Verne. The intent of Project Category 1 projects is to pump and treat groundwater within the southwesterly most basins - Pomona and Ganesha basins. Production well P-20 located in the Lower Claremont Heights Basin has also been adversely impacted and has not been in production in over 20 years. Table 3, *Groundwater Constituents of Potential Concern, and Treatment Facilities,* lists the Project Category 1 projects, the known constituents of potential concern, current treatment and proposed additional treatment.

Census tracts that appear to be affected by groundwater contamination from these sites are located in the Pomona Basin and Ganesha Basin, the southwesterly most basins in the project area.

The Strategic Plan identifies a number of Project Category 1 projects that when implemented, would enhance water supply, enhance groundwater management in the Six Basins, and protect and enhance water quality. This is because it provides the greatest opportunity to pump and treat groundwater for beneficial uses including a more sustainable supply of potable water, and to reduce high groundwater levels along the south and easterly portions of that basin.

Table 3 Groundwater Constituents of Potential Concern and Treatment Facilities

Site	Known Constituents of Potential Concern	Current Treatment	Proposed Additional Treatment
Reservoir 5	Concentrations of DCE Chromium 6 Nitrate Perchlorate	Air Stripping System	(1) construct ion exchange (IX) or biological treatment facility to remove Cr-6, nitrate, and perchlorate; and (2) expand existing air stripping facility or construct a GAC facility to remove DCE
Lincoln Mills	Concentrations of TCE, Nitrate Perchlorate	Air Stripping System	(1) construct ion exchange (IX) or biological treatment facility to remove nitrate and perchlorate; and (2) expand existing air stripping facility or construct a GAC facility to remove TCE
Del Monte 4	Concentrations of TCE, Arsenic	GAC System	(1) construct an arsenic treatment system
Durward 2	Concentrations of TCE, Nitrate Perchlorate	No facilities, well has been removed	(1) construct new well; (2) construct new air stripping, GAC; IX and/or biological treatment facilities at the new well to treat TCE, nitrate, perchlorate
Old Baldy Well	Concentrations of Nitrate and Perchlorate	Well has been inactive since 2002 due to high nitrate and perchlorate concentrations	(1) construct ion exchange (IX) or biological treatment facility to remove nitrate and perchlorate
P-20 Well[1]	Concentrations of Nitrate	Well has been inactive since 2000 due to high nitrate concentrations	(1) construct ion exchange (IX) or biological treatment facility to remove nitrate

Source: Strategic Plan for the Six Basins, WEI, 2017, Section 6. 3, Pump and Treat; and Section 6.5, Temporary Surplus.
Notes:
1. The City of Pomona's P-20 well site is listed under Project Category 3, Temporary Surplus Project, however, because this project is similar in type and scope to the Pump and Treat projects, it is included in this table and related discussion.

In addition to permits required by DWR for rehabilitation of pumps and new treatment facilities, SCAQMD has rules for constructing/operating treatment facilities to ensure they do not discharge air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The need to obtain a Permit to Construct/Operate would be considered on a project-by-project basis as new projects are proposed as set forth in mitigation measure HAZ-1.

Mitigation Measures

See Findings and Facts under Section E.2.7, Impact 4-8-1 for mitigation measure HAZ-1.

TVMWD finds that treating groundwater for constituents identified in Table 3, would result in an increase in the availability of treated potable water in the project area and assist with resolving

an underlying issue of high groundwater levels that would otherwise have the potential to damage buildings, and during a seismic event, be exposed to liquefaction-related damage without consideration of demographic or socioeconomic factors. TVMWD further finds that implementation of Project Category 1 projects would not disproportionately affect existing minority or low-income communities in the Six Basins project area during short-term construction or long-term operation.

Hydrology/Water Quality

Project Category 1 projects are intended to address water quality issues by rehabilitating existing wells and development of new treatment facilities at some of these sites as summarized above in the Hazards section. Hydrology issues at existing sites are largely associated with the potential for pollutants to enter stormwater and be transported offsite, affecting stormwater quality. This issue is addressed through implementation of mitigation measures HWQ-2 and HWQ-3 which requires that all construction contractors identify and implement Best Management Practices (BMPs) for the control of stormwater during construction. During long-term operation, Watermaster Parties are also responsible for minimizing stormwater runoff from these sites.

Mitigation Measures

See Findings and Facts under Section E.2.8 Impact 4.9-2, mitigation measures HWQ-2 and HWQ-3.

Conclusion: TVMWD finds that there would be a less than significant impact on Hydrology/Water Quality from proposed Project Category 1 projects, and such projects would not disproportionately affect existing minority or low-income communities in the Six Basins project area during short-term construction or long-term operation.

Transportation

Traffic generated by proposed Project Category 1 projects would be limited to construction traffic including: (1) delivery of equipment and material to the site; (2) construction worker trips; and (3) potential hauling excess soil off-site (Project Category 2, only). The Traffic Memo prepared for the Strategic Plan (DPEIR Appendix G) showed that a typical project is anticipated to generate fewer than 50 morning and evening peak hour trips. As such, traffic impacts associated with employee and construction-related activities is considered to be less than significant. However, there may be short-term impacts such as road detours or lane closures associated with equipment and material deliveries. Mitigation measures TR-1 through TR-3 address the need for a Watermaster Party or construction contractor to prepare and implement a Construction Traffic Management Plan. These measures have been identified to ensure that impacts can be minimized in the short term.

During operations minimal transportation/traffic impacts associated with the operation/maintenance of well sites and treatment facilities are anticipated. On a daily basis, site inspections involving access for a light duty vehicle would occur. However, at times wells and treatment facilities require maintenance which may involve the use of vehicles and equipment similar to those used during construction, mitigation measures TR-1 through TR-3 would apply.

Mitigation Measures

See Findings and Facts under Section E.2.11 Impact 4.14-1, mitigation measures TR-1 through TR-3.

Conclusion: TVMWD finds that implementation of mitigation measures TR-1 through TR-3 would ensure that construction activities requiring street closures would not disproportionately affect existing minority or low-income communities in the Six Basins project area during short-term construction or long-term operation.

E.2.6 Geology/Soils/Paleontological Resources/Mineral Resources

Geology/Soils

Impact 4.7-1 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, ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; or (iv) landslides?

Findings: Less than Significant Impact with Mitigation Incorporated

Facts:

Fault Rupture and Ground shaking

The area where Project Category 1 project sites are located are generally located south of the Indian Hill Fault and west of the San Jose Fault. Existing facilities are not known to be located on a fault as shown on the Alquist Priolo Earthquake Fault Zoning Map. However, this would be verified through the preparation of a site-specific geotechnical study as identified in mitigation measure GEO-1. In addition, implementation of Project Category 1 projects would expose proposed improvements at existing facilities to strong seismic shaking. Ground shaking could result in structural damage to new facilities, which in turn could affect their operation and the operation of related, interconnected systems. Therefore, structural, and mechanical failure of facilities that may be caused by strong ground shaking has the potential to adversely impact these facilities including shutting them down for repair after a seismic event. Structural elements of each project would be evaluated through design-level geotechnical assessments prior to final design and construction as required by the California Building Code (CBC) that require standard engineering practice and the appropriate standard of care for individual projects.

Compliance with CBC requirements and implementation of project-specific engineering design and construction measures would avoid the potential for adverse impacts associated with strong seismic ground shaking. Therefore, impacts related to strong seismic ground shaking can be reduced to a level that is less than significant based on site specific geotechnical investigations that would set forth the requirements for site development and long-term operation. Impacts associated with strong seismic ground shaking are addressed in mitigation measure GEO-2. With implementation of these measures, impacts would be considered to be less than significant.

Seismic-related Ground Failure Including Liquefaction

According to the Strategic Plan, there are areas within the Six Basins project area that are known to experience high groundwater levels. These areas are generally along the Indian Hill fault southeast of the Pedley Spreading Grounds; south of the Indian Hills fault and west of the Intermediate fault and a small area between the Intermediate and San Jose faults; and a large area adjacent to the San Jose Hills and west of the San Jose fault. Historically in these areas, depth to groundwater ranges between 50 and 100 feet below ground surface. The City of Pomona and Golden State Water Company have existing production wells within these areas of high groundwater in the Pomona and Upper Claremont basins, and the Reservoir 5 site is located in an area of high groundwater.

There is a potential for some Project Category 1 sites to be adversely affected during a seismic event. Impacts associated with seismic-related ground failure including liquefaction can be reduced to a level that is less than significant based on site specific geotechnical investigations that would set forth the requirements for site development and long-term operation.

Landslides

Steep slopes in the San Gabriel Mountains and related foothills that delineate the northerly boundary of the Six Basins project area, can be characterized as landslide-susceptible areas. Landslides and mudflow hazards exist on steep hillsides and in the creek and streambed areas such as SASG and TCSG. Though these areas may be susceptible to landslides, there are no Project Category 1 projects identified in these areas. Therefore, no impacts related to landslides are expected to occur.

Mitigation Measures

GEO-1 Should a project in any of the categories of projects be located within a designated Alquist-Priolo Fault Zone, the project proponent shall consider relocating the project to another site. If that is not feasible, then the project shall be designed in accordance with the most current version of the CBC and subject to a project specific Geotechnical Investigation.

GEO-2 Prior to construction of a project, a design-level geotechnical investigation shall be completed. The investigation shall identify all potential seismic hazards including fault rupture, and characterize the soil profiles, including liquefaction potential, expansive soil potential, and potential for subsidence to occur. The geotechnical investigation shall recommend site-specific design criteria to mitigate for seismic and non-seismic hazards, such as special foundations and structural setbacks, and these recommendations shall be incorporated into the design of individual projects.

Conclusions: TVMWD finds that with implementation of mitigation measures GEO-1 requiring the preparation of a site-specific geotechnical investigation and GEO-2 requiring compliance with CBC requirements and implementation of project-specific engineering design and construction measures would avoid the potential for adverse impacts associated with strong seismic ground shaking. TVMWD further finds that the potential for liquefaction to adversely affect groundwater well and treatment facilities can be minimized through the management of groundwater levels in areas of known high groundwater levels.

Impact 4.7-2 Result in substantial soil erosion or the loss of topsoil?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Construction activities for proposed Project Category 1 projects would result in minimal ground disturbance since these are existing well sites and some with existing treatment facilities that would be upgraded. However, excavation and grading that may be required for new treatment facilities could result in soil erosion during rain or high wind events. Such construction activities must comply with SCAQMD Rule 403 for dust control that would ensure the prevention and/or management of wind erosion and subsequent topsoil loss. This issue is addressed above in Section 3.2.2 and includes mitigation measure AQ-1 for the control of fugitive dust. Compliance with this measure would ensure that construction activities that could cause wind related soil erosion are reduced to less than significant levels and no additional mitigation measures have been identified.

Soil erosion associated with stormwater runoff is also a possibility for construction of Project Category 1 projects. To prevent erosion associated with stormwater runoff from construction sites that are one-acre or larger in size, construction contractors at each site would be required to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) in accordance with the requirements of the Statewide Construction General Permit (SWRCB Water Quality Order 2009-0009-DWQ). A SWPPP identifies best management practices (BMPs) to control erosion, sedimentation, and hazardous materials potentially released from construction sites into surface waters. Compliance with the Construction General Permit, site-specific SWPPP, and identified BMPs would ensure soil erosion and loss of topsoil impacts can be reduced to less than significant levels at each construction site.

For sites that are less than one-acre in size, the Statewide Construction General Permit does not apply. However, a construction contractor is still required to comply with minimum BMPs, as specified by the Municipal Separate Storm Sewer System (MS4) permit for each county. Each of the cities within the counties of Los Angeles and San Bernardino are co-permittees to the respective county MS4 permits. Watermaster Parties proposing construction projects must comply with these requirements and ensure that their respective construction contractors are implementing the required BMPs during all construction activities. Therefore, with compliance with the Statewide Construction General Permit and/or requirements under MS4 for the control of stormwater runoff from construction sites as set forth in mitigation measures HWQ-2 and HWQ-3, this impact would be less than significant.

Post construction of Strategic Plan projects would also be subject to MS4 requirements related to the control of on-site hydrology during storm events. All sites must retain stormwater flows on site and treat stormwater in accordance with an approved Water Quality Management Plan (WQMP) that incorporates Low Impact Development (LID) BMPs prior to release into a storm sewer.

Mitigation Measures

See Findings and Facts under Section E.2.2, Impact 4-3-1 mitigation measure AQ-1 and Section E.2.8, under Impact 4.9-2 mitigation measures HWQ-2 and HWQ-3.

Conclusions: TVMWD finds that with implementation of mitigation measure AQ-1 for the control of fugitive dust during construction, and with implementation mitigation measure HWQ-2 and HWQ-2 for a project-specific SWPPP or Drainage Plan during construction, the potential for substantial soil erosion or the loss of topsoil to occur during construction or operation of facilities at Project Category 1 project sites would be less than significant.

Impact 4.7-3 Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Rehabilitation of existing facilities or construction of additional facilities on existing Project Category 1 sites would not cause subsidence, settlement, lateral spreading, slope failure including landslides. However, where these types of unstable conditions may occur, existing and proposed facilities could be adversely affected. There is potential for damage to facilities on site to occur, however, because there are no employees associated with these projects (except for site inspections and periodic maintenance activities), impacts associated with unstable soil conditions on humans would be minimal. However, mitigation measure GEO-2 would still apply to projects that may be undertaken in areas susceptible to non-seismically induced geologic hazards. With implementation of GEO-2, this impact can be reduced to a less than significant level.

Mitigation Measures

See Findings and Facts under Section E.2.7, Impact 4.7-1 mitigation measure GEO-2.

Conclusions: TVMWD finds that with implementation of mitigation measure GEO-2 requiring the preparation of a design-level geotechnical investigation to identify potential geologic hazards including unstable soils that may be located on a Project Category 1 project site. Further, TVMWD finds that recommendations from the geotechnical investigation for site-specific design criteria to mitigate for seismic and non-seismic hazards, would ensure that this impact would be less than significant.

Impact 4.7-4 Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: The soils in the Six Basins project area are predominantly alluvial material within the valley area on top of bedrock. Predominant soils in the Six Basins project area are classified as Urban Land, defined as discontinuous human-transported material over alluvium derived from granite and/or sedimentary rock, ranging from 0 to 9 percent slope. Underlying soils are well drained to excessively drained sands, loams, and gravelly sands typical of alluvial material, down to bedrock. There are some locations within the project area that contain clay loams to sandy clay loams that have the highest shrink/swell potential. Typical construction techniques to address expansive soils if they are encountered on a project site is to remove the material and replace with a more suitable soil; or over excavate and recompact in place. The particular technique would be identified in a project's geotechnical investigation as identified in mitigation measure

GEO-2. Therefore, if expansive soils are encountered on a project site, they can be mitigated to a less than significant level with implementation of mitigation measure GEO-2.

Mitigation Measures

See Findings and Facts under Section E.2.2, Impact 4.7-1 mitigation measure GEO-2.

Conclusions: TVMWD finds that with implementation of mitigation measure GEO-2 requiring the preparation of a design-level geotechnical investigation to identify potential geologic hazards including expansive soils that may be located on a project site. The geotechnical investigation shall recommend site-specific design criteria to mitigate for seismic and non-seismic hazards, such as special foundations and structural setbacks, and these recommendations shall be incorporated into the design of individual projects. Therefore, with mitigation, this impact would be less than significant.

Paleontological Resources

Impact 4.7-6 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Because the EIR evaluates the Strategic Plan and related projects at a programmatic level, specific project design elements have not been finalized. However, as project construction is undertaken, excavation at some sites may be required; including Project Category 1 projects where new treatment facilities may be constructed. Therefore, mitigation measure GEO-3 was identified and will apply to all projects that require excavation at depths greater than three feet, a qualified paleontologist must be retained to determine if a study of the project area for paleontological resources should be undertaken. If the paleontologist determines this to be the case, he/she will conduct a paleontological resources assessment designed to identify potentially significant resources. The assessment would consist of: (1) a paleontological resource records search to be conducted at the Los Angeles County Natural History Museum and/or other appropriate facilities; (2) a field survey or monitoring during excavation (or both) if deemed appropriate by the paleontologist; and (3) recordation of all identified paleontological resources.

Mitigation Measures

GEO-3 For project-level development involving ground disturbance at depths greater than three feet, a qualified paleontologist shall be retained to determine the necessity of conducting a study of the project area(s) based on the potential sensitivity of the project site for paleontological resources. If deemed necessary, the paleontologist shall conduct a paleontological resources inventory designed to identify potentially significant resources. The paleontological resources inventory would consist of a paleontological resource records search to be conducted at the San Bernardino County Museum and/or other appropriate facilities; a field survey or monitoring where deemed appropriate by the paleontologist; and recordation of all identified paleontological resources.

Conclusions: TVMWD finds that excavation at project sites to depths of three feet or greater may reveal unknown paleontological resources. Where a project requires excavation, mitigation

measure GEO-3 shall be implemented which requires that a qualified paleontologist shall be retained to determine if on-site monitoring is required, and if resources are recovered during monitoring, that they be recorded. Therefore, the potential impacts to unknown paleontological resources would be less than significant.

E.2.7 Hazards and Hazardous Materials/Airport Safety/Wildfire Hazards

Hazards and Hazardous Materials

Impact 4.8-1 Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; or 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?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts:

Construction

Construction activities associated with the installation of proposed improvements to Project Category 1 sites include drilling, trenching, excavation or other ground disturbing activities to upgrade existing production wells and related pumps, meters, etc.; and new treatment facilities (ion exchange, biological treatment, or GAC). Construction activities may require the transport, use, and disposal of hazardous materials including gasoline, diesel fuel, hydraulic fluids, and other similarly related materials; generally, in support of heavy equipment use and drilling operations. In addition, other materials such as paints, adhesives, solvents, and other substances typically used in construction may also be used on-site during construction. Improper use, storage, or transport of hazardous materials could result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction projects, and there would be no greater risk for improper handling, transport, or spills associated with any of the Project Category 1 projects than would occur on any other similar construction site.

Construction contractors employed by the Six Basins Watermaster Party responsible for the development of a Project Category 1 project would be required to comply with all applicable federal, State, and local laws and regulations pertaining to the transport, use, disposal and storage of hazardous construction-related materials or waste during construction. These include but are not limited to requirements imposed by the US Environmental Protection Agency (EPA), the State Department of Toxic Substances Control (DTSC) and State Water Resources Control Board (SWRCB), and the Santa Ana or Los Angeles Regional Water Quality Control Boards (Regional Boards).

Mitigation measures HWQ-2 and HWQ-3 identified in Section E.2.8 sets forth the requirement for implementation of a SWPPP or other drainage plan in compliance with SWRCB and Regional Boards., to employ Best Management Practices (BMP) during project construction. Therefore, with implementation of BMPs, potential impacts associated with the construction of Project Category 1 projects would be less than significant and no mitigation is required.

Operation

Treatment Facilities

The use of hazardous materials and substances associated with the rehabilitation of existing wells and treatment facilities; and/ or the operation of certain types of treatment facilities may be subject to federal, State, and local health and safety requirements for the handling, storage, transportation, and disposal of hazardous materials. It is anticipated that during long-term operation of production wells (and related infrastructure) and water treatment facilities, hazardous materials (e.g., architectural coatings, lubricants, cleaning chemicals) could be used during the course of normal operations at any Project Category 1 sites. Good housekeeping practices and compliance with applicable laws governing the routine transport, storage, and use of hazardous materials would minimize the potential impacts to the public or environment.

Mitigation measure HWQ-3 sets forth the requirement for implementing site-specific drainage plans for the control of stormwater flows exiting a site during operations, including control of pollutants through stormwater treatment. Therefore, potential impacts associated with the operation of Project Category 1 projects would be less than significant with implementation of mitigation measure HWQ-3.

Mitigation Measures

See Findings and Facts under Section E.2.8, Impact 4.9-2 mitigation measures HWQ-2 and HWQ-3.

Conclusions: TVMWD finds that with implementation of mitigation measure HWQ-2 for the use of BMPs during construction and HWQ-3 for the development and implementation of a drainage plan at each Project Category 1 project site impacts associated with the release of hazardous materials into stormwater would be less than significant. TVMWD further finds, that at existing sites where drainage plans are already in place, the Watermaster Party proposing a project would be responsible for updating the existing plan.

Impact 4.8-2 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: There are three project sites that are located within ¼ mile of as school site. These are: (1) Reservoir 5 Site; (2) Del Monte Site; and (3) P-20 Well Site. Although the P-20 well site is a Project Category 3 project (Project Category 3) it was evaluated in the Program EIR with other Project Category 1 projects because the project would rehabilitate the existing well that has not been in production since 2002 due to high nitrate concentrations.

Reservoir 5, within a ¼ mile of an elementary school and a private college uses air stripping as the current treatment of groundwater to remove DCE. Typically, air stripping is conducted in an enclosed tank where groundwater is pumped into the tank and is aerated to evaporate the volatile organic compounds (VOC) found in the groundwater. After treating the water, the air and the vapors are either removed or, if the VOCs are low enough to meet SCAQMD Air Quality standards, they may be vented to the atmosphere. As part of the Strategic Plan, the air stripping

facility would continue to operate at Reservoir 5 and may be expanded or a granular activated carbon facility to remove DCE may be constructed. In addition, an ion exchange (IX) or biological treatment facility to remove Cr-6, nitrate and perchlorate may also be developed at this site.

At the Del Monte 4 site, the Claremont Colleges campus is located approximately 0.16 mile north of the site, and an elementary school is located approximately 0.12 mile to the southwest. Under existing conditions Golden State Water Company (GSWC) operates a GAC facility to remove TCE by blending groundwater with treated imported water and is proposing to add a wellhead treatment system to remove arsenic.

At the P-20 site, Claremont High School is located approximately 0.08 mile southwest of the site. The City of Pomona is proposing to increase groundwater production and treatment capacity in the Lower Claremont Heights Basin by constructing new treatment facilities to reduce nitrate concentrations in the produced water.

Mitigation measure HAZ-1 requires that prior to construction of a new air stripping or other treatment facility, or the rehabilitation/upgrade of existing treatment facilities, the Watermaster Party proposing new facilities to obtain a Permit to Construct from SCAQMD. Once completed, the Watermaster Party must apply for a Permit to Operate. SCAMD will review the permit applications and issue permits once it is determined that new treatment facilities can be operated with no adverse impacts. Implementation of this measure will ensure that operation of new or rehabilitated treatments facilities will result in less than significant impacts to the environment.

Mitigation Measures

HAZ-1 Permits. Prior to installation of new or relocated equipment, or prior to modification of any existing equipment, the Watermaster Party responsible for a project site where treatment facilities are located, or a diesel operated back-up generator is proposed, shall obtain a Permit to Construct from SCAQMD. Once a piece of equipment is installed, modified and/or operated, SCAQMD will process the application for a Permit to Operate.

Conclusions: TVMWD finds that with implementation of mitigation measure HAZ-1 requiring a Watermaster Party proposing a new treatment facility, or improvements to an existing treatment facility to be issued a permit to construct/operate such facilities from SCAQMD prior to commencing with construction of a facility. TVMWD further finds that operation of these facilities would result in a beneficial use by increasing groundwater production and treatment.

Impact 4.8-6 Substantially impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts:

Construction

Construction of proposed improvements to existing well sites would not impair implementation of or physically interfere with adopted emergency response plans or emergency evacuation plans. Construction activities at existing well sites would consist of the rehabilitation of production wells

and expansion of wellhead treatment facilities, or the construction of new wellhead treatment facilities. There would be no installation of pipelines or other facilities within rights-of-way adjacent to existing sites that would cause a road closure, lane closure or traffic detour; potentially affecting emergency access to an area or an evacuation route. During construction, haul trucks would be used to transport construction material to the site and remove any demolition debris associated with well or treatment facility rehabilitation or construction. This is considered to be a short-term or intermittent impact and only when a haul truck is transporting material to the site; or accessing/leaving a site. If construction would impact a road, the Watermaster Party proposing a project would be required to develop and implement a Traffic Control Plan prior to initiating construction. Such a plan shall be consistent with the appropriate city or county Emergency Response Plan as set forth in mitigation measures TR-1 through TR-3. Implementation of a Traffic Control Plan would ensure that impacts associated with the interruption of traffic would be less than significant.

Operation

Operation of the proposed facilities in this category of projects would not impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. The facilities consist of operation of production wells and groundwater treatment prior to being released into existing pipelines in adjacent streets, that, during operation, would not interfere with traffic flows. However, these facilities will require periodic maintenance; but such activities would be intermittent and require minimal trips that would not significantly impact the roadway network. Therefore, impacts to an adopted emergency plan would be less than significant during long-term operation.

Mitigation Measures

See Findings and Facts under Section E.2.11, Impact 4.14-1 mitigation measures TR-1 through TR-3.

Conclusions: TVMWD finds that implementation of mitigation measures TR-1 through TR-3 would ensure that construction activities requiring street closures would not disproportionately affect existing minority or low-income communities in the Six Basins project area during short-term construction or long-term operation.

E.2.8 Hydrology/Water Quality

Impact 4.9-1 Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: The Strategic Plan for the Six Basins, once approved, will become the water resources management program utilized by the Watermaster Parties to implement their respective water supply and water conservation projects in a coordinated manner to optimize conjunctive water management activities in the Six Basins, and thereby increase the reliability of the regional water supply. Increasing the groundwater extraction in existing production wells (Project Category 1), in conjunction with the development of new production wells (Project Category 3) would allow Parties to continue to control the groundwater levels in the Six Basins project area, in order to

prevent overdraft conditions from occurring. At the same time, continued monitoring at existing monitoring wells and the development of new monitoring wells in the Pomona Basin in particular, would allow the Parties to increase the monitoring of groundwater levels to provide additional data.

Increasing the groundwater extraction in existing production wells, in conjunction with the development of new production wells could exclude this water source from migrating to the adjacent Chino Basin resulting in the loss of this water source in that basin. However, the loss is likely to amount to a relatively small percentage of the total groundwater within the Chino Basin; resulting in no significant impact associated with the depletion of groundwater levels. To ensure that this impact would be less than significant, the Watermaster Parties operating existing production wells, or developing future production wells shall implement mitigation measure HWQ-1 that requires groundwater modeling to be conducted prior to upgrading existing wells or developing new wells.

Mitigation Measures

HWQ-1 Under existing conditions Watermaster conducts a comprehensive groundwater-level monitoring program across the Six Basins project area. The information developed from this monitoring program is used to identify potential impacts associated with the threat of high groundwater, pumping sustainability, chronic lowering of groundwater levels, developed yield and subsurface outflow to the Chino Basin. Under future conditions, the information developed from monitoring programs will be used to develop operating strategies and requirements for Strategic Plan projects to mitigate for these impacts.

Threat of High Groundwater. Potential operating strategies to mitigate the threat of high groundwater include: (1) modifying the put and take cycles to minimize impacts the threat of rising groundwater; (2) strategically re-distributing supplemental water recharge to minimize the threat of rising groundwater; (3) curtail spreading per Watermaster's methodology and deduct the estimated reductions in spreading from the responsible party's Storage and Recovery account; (4) construct and operate pumping facilities in the areas of concern to eliminate the threat of rising groundwater; (5) a combination of (1) through (4); and (6) the implementation of a monitoring program to verify the effectiveness of the mitigation actions.

Pumping Sustainability. Potential operating strategies include: (1) modifying the put and take cycles to minimize impacts to pumping sustainability: (2) strategically increasing supplemental water recharge to mitigate loss of pumping sustainability; (3) modifying a party's affected well (e.g., lowering pump bowls); (4) providing an alternate supply to the affected party to ensure it can meet its demands; (5) a combination of (1) through (4); and (6) the implementation of a monitoring program to verify the effectiveness of the mitigation actions.

Chronic Lowering of Groundwater Levels. Potential operating strategies include: (1) modifying the put and take cycles to minimize the potential chronic lowering of groundwater levels; (2) strategically increasing supplemental water recharge to mitigate chronic lowering of groundwater levels; (3) a combination of (1) and (2); and (4) the implementation of a monitoring program to verify the effectiveness of the mitigation actions.

Developed Yield. Potential operating strategies include: (1) modifying the put and take cycles to minimize impacts to developed yield; (2) strategically increasing supplemental water recharge to mitigate any reductions in developed yield; (3) deduct the estimated decrease in developed yield from the storage account; (4) strategically increase pumping in areas that will eliminate the decrease in developed yield; (5) a combination of (1) through (4); and (6) a periodic model recalibration and use of the model to estimate the impacts of the Strategic Plan program on developed yield.

Subsurface Outflow to the Chino Basin. If the data collected through the comprehensive groundwater-level monitoring and modeling monitoring program indicate chronic lowering of groundwater levels along the Chino Basin boundary, Watermaster will evaluate potential impacts to the Chino Basin through additional modeling and develop operating strategies to minimize, if appropriate.

Updated Operations Plan. In addition to the proposed operating strategies described above, Watermaster is in the process of updating its Operating Plan to include procedures that will enable the Watermaster to identify potential impacts and additional strategies or measures when projects are proposed and as they are implemented including procedures to: (1) analyze projects for the potential to cause substantial injury; (2) develop storage and recovery agreements that take into consideration the potential impacts described herein; and (3) implement a temporary surplus.

Conclusions: TVMWD finds that implementation of Project Category 1 in conjunction with implementation of other Strategic Plan projects, would not impede sustainable groundwater management of the basin by substantially decreasing groundwater supplies or interfering with groundwater recharge. Further, TVMWD finds that under future conditions, the information developed from monitoring programs will be used to develop operating strategies and requirements for Strategic Plan projects to mitigate for these potential impacts associated with ongoing implementation of the Strategic Plan.

Impact 4.9-2 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 onsite or offsite; ii) substantially increase the rate or amount of surface water runoff in a manner which would result in flooding on or offsite; iii) create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv) impede or redirect flood flows?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: The four potentially significant impacts are all related to drainage of a site or area that may result in runoff that could exceed capacity and thus cause erosion, siltation, flooding, contribute to polluted runoff, or redirect flows.

Construction

It is likely that at any Project Category 1 project site, improvements may not result in any new ground disturbance, or would result in ground disturbance of less than an acre. Therefore, construction activities would not likely trigger the "one acre" rule that would require the

preparation of a SWPPP under the statewide Construction General Storm Water Permit. However, construction sites would still be subject to the requirements of the Los Angeles County MS4 permit in which the cities within the Six Basins project area are co-permittees. Note: there are no projects in this category within the County of San Bernardino. An MS4 permit allows cities and counties to discharge pollutants from public stormwater systems to Waters of the US, under the federal Clean Water Act. Temporary Best Management Practices (BMPs) must be employed during construction to prevent stormwater runoff and the discharge of pollutants, including sediment, into the local storm drain system. Silt fences, inlet protection, and site-stabilization techniques are typical BMPs at a construction site.

Mitigation measure HWQ-2 shall be implemented at each Project Category 1 project site during construction activities. This measure requires that prior to the commencement of construction, a Watermaster Party or its construction contractor shall prepare a SWPPP (if the area of disturbance of one acre or greater) or provide the city or county in which construction activities will take place, with a list of BMPs to be implemented and a schedule for completion of such activities.

Finally, regarding a proposed project resulting in an impediment to or the redirection of flood flows during construction, all project sites are located on developed sites in urban areas where storm drain systems are in place. Therefore, the improvements to these sites would not result in a change in existing flood flows.

Operation

Implementation of Project Category 1 projects may result in the addition of impervious surfaces that could increase stormwater runoff quantity during post-construction operation, at some sites such as Reservoir 5 and Durward 2 where portions of these sites are unpaved. However, other sites such as Lincoln/Mills and Old Baldy are wholly developed and paved, so that upgrades to the groundwater well or additional treatment facilities, would not result in an increase in impervious surfaces. Mitigation Measure HWQ-3 requires that prior to construction at a project site, the Watermaster Party proposing a project that would result in the change in volume or direction of flows shall prepare a drainage plan that identifies design features to reduce stormwater peak concentration flows exiting a site (if they result in a change from existing conditions) so that the capacities of the existing downstream drainage facilities are not exceeded. Such design features may include bioretention, sand infiltration, return of stormwater for treatment within the treatment plant, and/or a detention basin.

In addition, the *Air Quality Impact Analysis* (DPEIR Appendix B.1) identified the need to comply with the SCAQMD requirements to implement Best Available Control Measures (BACM) for the control of fugitive dust and wind erosion, especially during Santa Ana wind conditions would ensure that impacts associated with wind related erosion can be reduced to a less than significant level. Therefore, compliance with mitigation measure HWQ-2 and AQ-1, temporary impacts associated with construction stormwater runoff would be less than significant. Likewise, implementation of a site drainage plan as set forth in mitigation measure HWQ-3, would ensure that impacts associated with on-going operation of a Project Category 1 site would be less than significant.

Mitigation Measures

HWQ-2 Implementation of a SWPPP and the Use of BMPs During Construction. Prior to commencement of any ground disturbing activities on a project site, the Watermaster Party or construction contractor shall prepare a SWPPP (area of disturbance one acre or greater) and submit a Notice of Intent to the State Water Resources Board. Implementation of BMPs as outlined in the SWPPP shall be on-going during construction activities. A copy of the SWPPP and the Waste Discharge Identification (WDID) number, shall be kept at the construction and available for review by inspectors until construction is completed. For sites where the area of disturbance would be less than one acre, the project proponent or construction contractor is still responsible for maintaining the site and must provide the city in which construction activities will take place, with a list of BMPs and a schedule for completion of such activities, prior to commencement of construction activities.

HWQ-3 Implementation of a Drainage Plan to Reduce Downstream Flows. Prior to construction of project facilities, the Watermaster Party proposing a project shall prepare a drainage plan that includes design features to reduce stormwater peak concentration flows exiting the above ground facility sites so that the capacities of the existing downstream drainage facilities are not exceeded. These design features could include bioretention, sand infiltration, return of stormwater for treatment within the treatment plant, and/or detention facilities.

Also see Findings and Facts under Section E.2.2 mitigation measure AQ-1.

Conclusions: TVMWD finds that construction/operation of Project Category 1 projects would not substantially alter the existing drainage pattern of the site or area through the addition of impervious surfaces that would result in increased erosion or siltation, an increase in the rate or amount of surface runoff, exceed the capacity of a stormwater drainage system, or impede or redirect flood flows with implementation of mitigation measures HWQ-2, HWQ-3, and AQ-1.

Impact 4.9-3 In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Project Category 1 project sites are all located in urban areas approximately 35 miles north and northeast of the Pacific Ocean. In addition, none of the project sites are located adjacent to any large standing water bodies that could experience a seiche.

Release of Pollutants During Construction

See discussion under Impact 4.9-2 for discussion of NPDES and MS4 stormwater requirements.

Mitigation Measures

See Findings and Facts under Section E.2.8, Impact 4.9-2 mitigation measures HWQ-2 and HWQ-3.

Conclusions: TVMWD finds that construction/operation of projects in Project Category 1 would not cause a flood hazard or release pollutants into a storm drain system due to project inundation with implementation of mitigation measure HWQ-2 and HWQ-3. Further, TVMWD finds that the Six Basins project area is not located in an area with the potential to be impacted by a tsunami or seiche.

Impact 4.9-4 Violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or ground water quality?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Issues to be resolved for this impact are related to both construction of new facilities and long-term operation/maintenance of the facilities in a way that would prevent degradation of surface or ground water quality.

Construction

SWRCB has issued General Waste Discharge Requirements (WDRs) under Order No. R4- 2013-0095, NPDES No. CAG 994004 (Dewatering General Permit) that addresses non-stormwater construction-related discharges from activities including dewatering related to well head improvements that require water extraction and disposal, and water line testing that may be required during construction activities at Project Category 1 sites. In addition, although not anticipated for projects in this category, there is a potential to encounter shallow groundwater that could potentially interfere with construction activities, requiring groundwater dewatering in support of construction.

For projects that require dewatering, discharges are covered under a separate NPDES General Permit (Groundwater Dewatering Permit) which specifically addresses groundwater extracted from major well rehabilitation and redevelopment activities for potable water supply wells. Dewatering typically includes the extraction of shallow groundwater and discharge into nearby storm drains in order to complete the construction of underground facilities, such as structural building foundations for new treatment facilities. The discharge requirements include provisions requiring notification, testing, and reporting of dewatering and testing-related discharges, and authorizes such construction-related discharges as long as all conditions of the permit are fulfilled. Mitigation measure HWQ-4 shall be implemented prior to commencement of well rehabilitation activities that involve dewatering or other water discharge. Implementation of mitigation measures HWQ-2 through HWQ-4, will ensure that impacts associated with Project Category 1 projects during construction would be less than significant.

Operation

New facilities would be located within existing sites which may result in an increase in the amounts of impervious surfaces that could increase stormwater runoff if uncontrolled. Each of the existing sites is subject to the General Industrial Stormwater Permit that requires facility design to include structural controls to protect stormwater runoff quality. Mitigation measure HWQ-3 requires the implementation of a drainage plan to reduce flows from a site. Because Project Category 1 projects are all located at existing sites, the requirement would be to update the existing permit with the revised drainage plan showing site design features that will ensure compliance with the General Industrial Stormwater Permit. Such design features may include bioretention, sand

infiltration, return of stormwater for treatment within the treatment plant, and/or detention basin. Therefore, with implementation of mitigation measure HWQ-3, impacts associated with operation and maintenance activities at Project Category 1 project sites would be less than significant.

Regarding groundwater quality, the intent of this category of projects is to upgrade existing facilities in order to increase groundwater production and add additional treatment facilities at existing sites. Upon approval of the new or upgraded facilities by the Department of Water Resources (DWR), Project Category 1 projects would allow Watermaster Parties to increase the amount of groundwater they extract and treat, resulting in a beneficial impact by increasing the reliability of the groundwater resource to meet existing and future demand while reducing the dependence on imported water which may not always be available in the quantities Watermaster Parties have relied upon in the past. Per the Strategic Plan "… *imported water is becoming increasingly more expensive, and its reliability is threatened by natural disasters, climate change, and changing environmental regulations*." (Strategic Plan page 4-1)

Mitigation Measures

HWQ-4 Dewatering General Permit. Prior to commencement of construction activities that would require dewatering and conveyance of groundwater to surface water including but not limited to a storm drain system, shall submit a Notice of Intent (NOI) to SWRCB under the requirements of the Dewatering General Permit. The NOI shall include any additional information including a list of BMPs for preventing degradation of water quality or impairment of receiving waters.

Conclusions: TVMWD finds that construction/operation of projects in Project Category 1 would not violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or ground water quality with implementation of mitigation measures HWQ-2 through HWQ-4.

Impact 4.9.5 Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Findings: Less Than Significant impact with Mitigation Incorporated

Facts: Regarding water quality control plans, see discussion under impacts 4.9-2 through 4.9-4.

Regarding compliance with a sustainable groundwater management plan, Senate Bills 1168 and 1319 and Assembly Bill 1739, signed by the Governor in September 2014, amended to California Water Code to establish the Sustainable Groundwater Management Act (SGMA). The SGMA requires the development of sustainable groundwater management plans for all medium- and high-priority basins, as defined by DWR; mandates the creation of local groundwater sustainability agencies to oversee and implement the plans; and outlines the guidelines and schedule for complying with the Act. Section 10721.8 of the amended Water Code exempts adjudicated areas and local agencies that conform to the requirements of an adjudication of water rights from the provisions of the SGMA (specifically naming the Six Basins as exempt) except for the following annual reporting requirements:

> By April 1, the Six Basins Watermaster must submit to the DWR a report containing the following information to the extent available for the portion of the basin subject to the adjudication: (a) Groundwater elevation data unless otherwise submitted pursuant to Section 10932.2; (b) Annual aggregated data identifying groundwater extraction for the preceding water year; (c) Surface water supply used for or available for use for groundwater recharge or in-lieu use for the preceding water year; (d) Total water use for the preceding water year; (e) Change in groundwater storage; and (f) The annual report submitted to the court.

Pursuant to the requirements of the SGMA, the Six Basins Watermaster has incorporated reporting items "a" through "f" within each of the Annual Report submitted to date. The intent of the Strategic Plan is to continue to manage the groundwater basins in a reliable and sustainable way in order to ensure a continuous supply of water to the Watermaster Parties and their customers.

Mitigation Measures

See Findings and Facts under Section E.2.9, Impact 4.9-1 mitigation measure HWQ-1.

Conclusions: TVMWD finds that construction/operation of Strategic Plan Project Category 1 projects would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan with the implementation of mitigation measures HWQ-1 through HWQ-3.

E.2.9 Noise

Impact 4.11-1 Generation of a substantial temporary or permanent increase in ambient noise levels, or ground-borne vibration 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?

Findings: Less Than Significant with Mitigation Incorporated

Facts: Because the Strategic Plan is a long-range plan (20 years), it is unknown when projects would be developed. Therefore, to provide a worst-case analysis of potential Noise impacts associated with construction of Strategic Plan projects, the Strategic Plan's Noise Impact Analysis Report assumed a 13-month construction period. The construction scenario utilized includes the development of the following: (i) the construction of a treatment facility with related infrastructure; (ii) up to 8,500 linear feet of pipeline construction; and (iii) the construction of the new recharge basin at the San Antonio Spreading Grounds (SASG). Project Category 1 projects consist of the rehabilitation of wells and upgrades to treatment facilities or the construction of new treatment facilities at existing well sites.

Noise

To describe construction noise levels, measurements were collected for similar activities at several construction sites in southern California, including grading and well drilling activities. Because these reference noise levels were collected at varying distances from a receptor, all construction noise measurements were adjusted to describe a common reference distance of 50 feet for

comparison purposes. Project construction activities were then analyzed using the reference construction noise levels. These are summarized in Table 4.

Table 4 Highest Project Construction Equipment Noise Levels at 50 Feet

Reference Construction Activity[1]	Reference Noise Level @ 50 Feet (dBA Leq)
Truck Pass-Bys & Dozer Activity	59.2
Dozer Activity	64.2
Well Pump Drilling	70.7
Non-Drilling Well Pump Construction Activity	62.8
Crane Activity	68.3
Highest Reference Noise Level at 50 Feet:	**70.7**

Source: Urban Crossroads, Six Basins Noise Impact Analysis, Cities of Claremont, Pomona, La Verne, and Upland and the County of Los Angeles, Six Basins Watermaster, March 2021; Table 6-2.

Notes:

1. Reference construction noise level measurements taken as previously shown on Table 4.11-6.

The construction noise analysis showed that sensitive receiver locations within 97 feet of the highest noise-generating project construction activities would experience noise levels that could exceed the 65 dBA Leq construction noise level threshold. This is shown in Table 5. The 65 dBA Leq construction noise level threshold is based on the Municipal Code standards of jurisdictions within the Six Basins project area. The 97-foot screening distance would be used for any future focused construction noise analysis that may be required at the time a project is proposed.

Table 5 Focused Construction Analysis Screening Distance

Worst-Case Construction Activity	Highest Construction Noise Levels @ 50 Feet (dBA Leq)[1]	Distance to 65 dBA Leq Noise Level Contour[2]
Grading & Well Drilling	70.7	97 feet

Source: Urban Crossroads, Six Basins Noise Impact Analysis, Cities of Claremont, Pomona, La Verne, and Upland and the County of Los Angeles, Six Basins Watermaster, March 2021; Table 6-3.

Notes:

1. Construction equipment noise levels as shown in Table 4.11-7.
2. Estimated distance to the 65 dBA Leq noise level contour.

The Noise Analysis concluded that the highest noise generating activities are expected to be grading and well drilling. For Project Category 1 projects, groundwater production wells are already in place and would be rehabilitated, an activity that would not require drilling a new well. However, because a number of these sites are located in or near residential neighborhoods or near schools, construction generated noise may be substantial, although short-term. Therefore, on a project-by-project basis, mitigation measures NOI-1 through NOI-4 may be required.

Operation

To estimate the operational noise impacts associated with new Project Category 1 projects, multiple reference noise level measurements were collected from similar types of activities to determine a conservative reference noise level for each activity and represent the noise levels expected with the development of new wells and treatment facilities. Operational noise impacts

are associated with enclosed well pump start-ups, air releases, and continuous pump activity in addition to enclosed equipment exhaust activities. For Project Category I projects there are no new wells proposed but some wells would be rehabilitated.

Based on the reference noise levels it was possible to estimate the distance from each project-related operational noise activity to the noise level contour boundary of each jurisdiction's exterior noise level standards as shown in Table 6. It is important to note that the operational noise contours do not account for any additional attenuation provided by existing barriers or topography at the adjacent receiver locations near project sites, and therefore, likely overstate project-related operational noise levels associated with pump and treat activities.

Table 6 Unmitigated Operational Noise Levels

Highest Reference Noise Source	Unmitigated Reference Noise Level @ 50 Feet (dBA)[1]		Distance from Noise Source to Nighttime Noise Level Standard Contour[2]		
			dBA L25	dBA L50	
	L50	L25	Claremont (55 dBA L25)	Pomona (50 dBA L50)	La Verne, Upland, & County of L.A. (45 dBA L50)
Well Pump Activities	45.4	45.6	17 feet	29 feet	52 feet
Exhaust Activities	47.7	47.9	22 feet	38 feet	68 feet

Source: Urban Crossroads, Six Basins Noise Impact Analysis, Cities of Claremont, Pomona, La Verne, and Upland and the County of Los Angeles, Six Basins Watermaster, March 2021; Table 5-2.

Notes:

1. Highest reference noise level by activity type, as previously shown on Table 4.11-6.
2. Estimated distance to the noise level contour boundary for each jurisdiction's nighttime noise level standard.

Although the *Noise Impact Analysis* evaluated the Strategic Plan and its related projects at a program level it was assumed that because proposed Project Category I projects are similar in function and type of equipment to existing conditions at these sites, a project's anticipated operational noise sources were assumed to generate unmitigated noise level contour boundaries that will largely be located within the boundaries of each site.

At receiver locations in the cities of Pomona, La Verne, Upland, and the County of Los Angeles, unmitigated well pump activity noise levels are shown to approach 45.4 dBA L50 at 50 feet, and enclosed equipment exhaust activity noise levels are shown to approach 47.7 dBA L50. The percent noise level is the level exceeded "n" percent of the time during the measurement period, so L_{25} is the noise level exceeded 25 percent of the time and L_{50}, 50 percent of the time. The cities of Pomona, La Verne, Upland, and the County of Los Angeles identify nighttime noise level limits of 50 dBA L50 and 45 dBA L50, respectively, and with the additional noise attenuation provided by distance, screen and perimeter walls at some of the well sites and/or at adjacent residential receiver locations, in addition to the building enclosures recommended by the *Noise Impact Analysis* (mitigation measure NOI-6), project operational noise levels would be reduced by a minimum of 5 dBA to range from 40.4 dBA L50 to 42.7 dBA L50 at 50 feet.

At receiver locations in the City of Claremont, unmitigated well pump activity noise levels are shown to approach 45.6 dBA L25 at 50 feet, and enclosed equipment exhaust activity noise levels are shown to approach 47.9 dBA L25. The City of Claremont identifies a nighttime noise level limit of 55 dBA L25, and with the additional noise attenuation provided by distance, screen and perimeter walls at some of the well sites and at adjacent residential receiver locations, in addition to the enclosures recommended in the *Noise Impact Analysis* (mitigation measure NOI-6), project operational noise levels would be reduced by a minimum of 5 dBA to range from 40.6 dBA L50 to 42.9 dBA L50 at 50 feet. The 5 dBA of barrier attenuation assumed in the analysis was the minimum noise attenuation achievable by breaking the line-of-sight to the receiver location, which is anticipated to be attained by screen and perimeter walls at some of the well sites and at adjacent residential receiver locations, the enclosures recommended in the *Noise Impact Analysis*, and existing intervening structures.

Vibration

Construction projects have the potential to result in varying degrees of temporary ground vibration, depending on the specific construction activities and equipment used. Based on the representative vibration levels shown in Table 7*,* for various construction equipment types, it is possible to estimate the human response (annoyance).

To quantify vibration, the Noise Analysis used the peak particle velocity (PPV), defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings but is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Instead, the human body responds to average vibration amplitude often described as the root mean square (RMS). The RMS amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body. Decibel notation (VdB) is commonly used to measure RMS. Decibel notation (VdB) serves to reduce the range of numbers used to describe human response to vibration. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receivers for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment.

Table 7 Vibration Source Levels for Construction Activities

Equipment[1]	PPV (in/sec) at 25 feet
Small bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076
Large bulldozer	0.089
Auger Drill	0.089

Source: Urban Crossroads, Six Basins Noise Impact Analysis, Cities of Claremont, Pomona, La Verne, and Upland and the County of Los Angeles, Six Basins Watermaster, March 2021; Table 6-4.

Notes:

1. Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, September 2018.

The background vibration-velocity level in residential areas is generally 50 VdB. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Table 8 shows the standards for jurisdictions within the Six Basins project area.

Table 8 Construction Vibration Level Standards

Jurisdiction	Municipal Code Section	Root-Mean-Square Velocity Standard (in/sec)
Claremont	16.154.020(J)	0.05
Pomona	18-309	0.05
La Verne	n/a	n/a
Upland	n/a	n/a
County of L.A.	12.08.350	0.01

Source: Urban Crossroads, Six Basins Noise Impact Analysis, Cities of Claremont, Pomona, La Verne, and Upland and the County of Los Angeles, Six Basins Watermaster, March 2021; Table 3-3.
Notes:
"n/a" = Jurisdiction's municipal code does not specify a construction noise level standard.

Based on the available vibration level standards shown on Table 8, an acceptable construction vibration level threshold of 0.05 in/sec RMS was used to evaluate vibration levels generated by construction at the nearby sensitive land uses within the cities of Claremont, Pomona, La Verne, and Upland, and the County of Los Angeles threshold of 0.01 in/sec RMS is used to determine potential impacts at receivers in unincorporated areas of the County of Los Angeles.

The results of the program-level construction vibration analysis indicated that sensitive receiver locations within 25 feet of a project's construction activities in the cities of Claremont, Pomona, La Verne, and Upland are anticipated to experience vibration levels of up to 0.063 in/sec RMS and could potentially exceed the 0.05 in/sec RMS threshold. In addition, sensitive receiver locations within 50 feet of a project's construction activities in the unincorporated areas of the County of Los Angeles adjacent to city boundaries are anticipated to experience vibration levels ranging from 0.022 in/sec RMS at 50 feet to 0.063 in/sec RMS at 25 feet and could potentially exceed the 0.01 in/sec RMS threshold identified by the County of Los Angeles. Therefore, project construction vibration mitigation measures are required – on a project-by-project basis mitigation measure NOI-1 shall be implemented requiring the preparation of site-specific noise and vibration plan. This will provide a focused analysis of individual activities and construction equipment once detailed construction plans are available for sites near occupied sensitive receiver locations within the identified screening distances of a project's construction activities. To reduce potential impacts associated with vibration generating construction activities, the Watermaster Party proposing a project must prepare and implement a focused construction noise and vibration mitigation plan based on mitigation measures NOI-1 and NOI-5 if either or both of the following screening criteria are met:

- If project construction activities would occur within 100 feet of occupied, sensitive receiver locations; or
- If high vibration-generating construction activities such as the use of well drilling equipment, heavy mobile equipment (greater than 80,000 pounds), or large loaded trucks would be

used within 25 feet of occupied, sensitive receiver locations in the cities of Claremont, Pomona, La Verne, and Upland; or within 50 feet of occupied, sensitive receiver locations in unincorporated County of Los Angeles.

Implementation of NOI-1 through NOI-5 project construction vibration levels would be reduced to less than significant levels.

Mitigation Measures

NOI-1 The following mitigation measures are required to reduce noise and vibration levels produced by the construction equipment at nearby, occupied sensitive receiver locations:

- A focused construction noise and vibration mitigation plan shall be required if any or both of the following screening criteria are met:
  - If project construction activities would occur within 100 feet of occupied, sensitive receiver locations (e.g., residential, school, etc. uses):
    - A focused construction noise mitigation plan shall be required which evaluates whether project construction noise levels would exceed the 65 dBA Leq exterior noise level limit at occupied sensitive receiver locations, and the mitigation measures (if any) necessary to satisfy the 65 dBA Leq exterior noise level limit.
    - Potential mitigation measures to reduce project construction noise levels include, but are not limited to, temporary noise barriers, the use of alternative equipment, noise level monitoring, temporary relocation of residents, or a combination of the above.

NOI-2 During all project site construction, the construction contractors shall ensure that all construction equipment, fixed or mobile, shall have properly operating and maintained mufflers, consistent with manufacturers' standards. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise-sensitive receivers nearest the Project site.

NOI-3 The construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receivers nearest the project site during all project construction (i.e., the center of each site).

NOI-4 The contractor shall design delivery routes of equipment and materials to minimize the exposure of sensitive land uses or residential dwellings to delivery truck-related noise.

NOI-5 If high vibration-generating project construction activities such as well drilling equipment, heavy mobile equipment (greater than 80,000 pounds), or large loaded trucks would be used:

- Within 25 feet of occupied, sensitive receiver locations in the cities of Claremont, Pomona, La Verne, and Upland; or
- Within 50 feet of occupied, sensitive receiver locations in unincorporated County of Los Angeles:
  - A focused construction vibration mitigation plan shall be required which evaluates whether project construction vibration levels would exceed the exterior vibration level limit at occupied sensitive receiver locations, specific to that

jurisdiction's standards, and the mitigation measures (if any) necessary to satisfy the exterior vibration level limit.

- Potential mitigation measures to reduce project construction vibration levels include, but are not limited to, the use of alternative equipment, vibration level monitoring, temporary relocation of residents, or a combination of the above.

NOI-6 The following operational noise abatement measures shall be required to further reduce the potential operational noise levels received at nearby sensitive receiver locations:

- New, or existing unenclosed, well pumps shall be enclosed to further reduce operational noise levels at nearby sensitive receiver locations (e.g., residential homes). The location of any louvres or openings in the enclosure assembly would reduce the overall noise reduction of the enclosure, and therefore, shall be oriented away from nearby residential homes, if feasible. In addition, acoustically rated louvres and materials within the enclosure construction are recommended to further reduce the noise levels at the well pump source.
- All trucks transiting on-site in outdoor areas of the project facilities should be operated with properly functioning and well-maintained mufflers.
- Maintain quality pavement conditions on the property that are free of vertical deflection (i.e., speed bumps) to minimize truck noise.
- Truck access gates and loading areas should have posted signs which state:
  1. Truck drivers shall turn off engines when not in use;
  2. No music or electronically reinforced speech from workers should be audible at noise-sensitive properties.

Conclusions: TVMWD finds that during construction of Strategic Plan Although the *Noise Impact Analysis* evaluated the Strategic Plan and its related projects at a program level it was assumed that because proposed Project Category 1 projects are similar in function and type of equipment to existing conditions at these sites, a project's anticipated operational noise sources were assumed to generate unmitigated noise level contour boundaries that will largely be located within the boundaries of each site. TVMWD further finds that Project Category 1 projects would not exceed noise level and vibration level standards with implementation of mitigation measures NOI-1 through NOI-5. Further TVMWD finds that for operation of Although the *Noise Impact Analysis* evaluated the Strategic Plan and its related projects at a program level it was assumed that because proposed Project Category 1 projects are similar in function and type of equipment to existing conditions at these sites, a project's anticipated operational noise sources were assumed to generate unmitigated noise level contour boundaries that will largely be located within the boundaries of each site. For Project Category 1 projects with existing noise attenuation (walls, screening, distance to nearest receptor) and the implementation of mitigation measure NOI-6, impacts associated with the operation of

E.2.10 Public Services/Recreation

Impact 4.13-1 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: i) Fire Protection; ii) Police Protection?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Project Category 1 projects include improvements to existing wells and treatment facilities and do not require the development of new or expansion of existing fire or police facilities. In addition, improvements to existing facilities would not directly induce substantial population growth or employment growth in the Six Basins project area that would require an increase in calls for fire or police assistance resulting in a reduction in service ratios, response times or other performance standards used to ensure adequate fire and police protection.

Construction

Because the project sites are all improved with existing wells and most with treatment facilities, the assumption has been made that during rehabilitation and/or construction activities, all equipment and vehicles can be accommodated on site and will not require staging off site. Therefore, regarding emergency access for fire and police personnel, for proposed Although the *Noise Impact Analysis* evaluated the Strategic Plan and its related projects at a program level it was assumed that because proposed Project Category 1 projects are similar in function and type of equipment to existing conditions at these sites, a project's anticipated operational noise sources were assumed to generate unmitigated noise level contour boundaries that will largely be located within the boundaries of each site.

projects, impacts on the ability of fire and/or police departments to respond to calls within the vicinity of a project site would be less than significant. If construction would impact a road, the Watermaster Party proposing a project would be required to develop and implement a Traffic Control Plan prior to initiating construction. Such a plan shall be consistent with the appropriate city or county Emergency Response Plan as set forth in mitigation measures TR-1 through TR-3. Implementation of a Traffic Control Plan would ensure that impacts associated with the interruption of traffic that may adversely impact response times during construction would be less than significant.

Operation

As under existing conditions, under future conditions with improvements, project sites would be secured with perimeter fencing or walls, and locked gates. Access to any of the sites would be daily for inspections or intermittent to perform routine maintenance with only one or two maintenance workers on site at a time. Therefore, during operation of the production wells and treatment facilities, no substantial adverse physical impacts affecting service ratios, response times or other performance objectives for police and fire protection services would occur.

Mitigation Measures

See Findings and Facts under Section E.2.11, Impact 4-14-1 mitigation measures TR-1 through TR-3.

Conclusions: TVMWD finds that during construction of Strategic Plan projects, if construction would impact a road, the Watermaster Party proposing a project would be required to develop and implement a Traffic Control Plan prior to initiating construction. Such a plan shall be consistent with the appropriate city or county Emergency Response Plan as set forth in mitigation measures TR-1 through TR-3. Implementation of a Traffic Control Plan would ensure that impacts associated with the interruption of traffic that may adversely impact response times during construction would be less than significant.

E.2.11 Transportation

Impact 4.14-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Because none of the Strategic Plan projects include any new residents or employees, there would be no impacts to transit, bicycle or pedestrian facilities. Therefore, the evaluation on project-related trips is limited to impacts to roadways.

The project traffic engineer conducted a trip generation assessment that assumed all construction activities associated with the Strategic Plan projects would occur within the same general time period (13 months) to maximize the number of trips associated with construction. The traffic engineer created the project's trip generation based on the assumptions listed herein and based on the construction scenario evaluated for other environmental impacts.

- All construction activities would occur between the hours of 7 am and 6 pm, Monday through Saturday (excludes Sundays and Holidays)
- Staging of equipment would occur on-site, so no daily arrival/departure of equipment was assumed to occur.
- *New Treatment Facility*: The number of construction workers was assumed to be 15, including equipment operators and laborers. This results in approximately 30 passenger car trips per day (15 employees x 2-way trip [inbound and outbound] = 30 trips per day). Based on the hours of construction, the employees were assumed to arrive on-site prior to the morning peak period (7-9 am) and depart after the evening peak period (4-6 pm).
- *New Well Sites*: A total of 6 workers was assumed to be on a project site at any one time. This results in approximately 12 passenger car trips per day (6 employees x 2-way trip [inbound and outbound] = 12 trips per day). Based on the hours of construction, the employees were assumed to arrive on-site prior to the morning peak period (7-9 am) and depart after the evening peak period (4-6 pm).
- *New Pipeline Interconnects*: The number of construction workers was assumed to be 15, including equipment operators and laborers. This results in approximately 30 passenger car trips per day (15 employees x 2-way trip [inbound and outbound] = 30 trips per day). Based on the hours of construction, the employees were assumed to arrive on-site prior to the morning peak period (7-9 am) and depart after the evening peak period (4-6 pm).

For all projects, each employee was assumed to drive to and from the construction site each day. The traffic engineer assumed that employees would arrive up to 30 minutes prior to the workday and leave up to 30 minutes after the workday ends. The project trip generation analysis showed that construction of projects identified in the Strategic Plan is anticipated to generate 192 vehicle

trips per day with 12 morning peak hour trips and 12 evening peak hour trips. This equates to approximately 432 passenger car equivalent (PCE) vehicles per day with 36 PCE morning peak hour trips and 36 PCE evening peak hour trips.

In addition, construction projects are anticipated to generate fewer than 50 morning and evening peak hour trips. Therefore, traffic impacts associated with employee and construction-related activities are considered to be less than significant. However, there may be short-term impacts such as road detours or lane closures associated with pipeline construction well drilling, or equipment deliveries. Therefore, mitigation measures TR- through TR-3 were identified in the project's Trip Generation Memo (DPEIR Appendix G) to ensure that impacts can be minimized in the short term. No transportation/traffic impacts associated with the operation/maintenance of well sites, treatment facilities, spreading grounds, etc., were anticipated as these activities would be intermittent and be limited to one or two vehicles on site.

Mitigation Measures

TR-1 Prior to initiating construction of proposed facilities, the Watermaster Party proposing a project or the designated construction contractor, shall prepare and implement a Construction Traffic Management Plan that contains comprehensive strategies for maintaining emergency access on public streets. In general, the Construction Traffic Management Plan shall ensure that to the extent practical, construction traffic would access a project site during off-peak hours or limited access during the peak hours; and that construction traffic would be routed to avoid travel through, or proximate to, sensitive land uses. The Plan shall also include, where necessary, the use of flags, signs, and lights, as well as flag persons to direct traffic.

Where a project includes new pipelines to connect wells to treatment facilities or to connect the Pomona Water Treatment Plant (WTP) to the new San Antonio Spreading Grounds (SASG) recharge basin, strategies shall include, but are not limited to, maintaining steel trench plates on public streets to restore access across open trenches and identification of alternate routing around construction zones.

Police, fire, and other emergency service providers shall be notified of the timing, location, and duration of the construction activities and the location of detours and lane closures. The Watermaster Party proposing a project, or designated construction contractor shall ensure that the Construction Traffic Management Plan and other construction activities are consistent with the Emergency Response Plan of the jurisdiction in which the project is being constructed.

TR-2 As part of the Construction Traffic Management Plan, it shall be stipulated that the delivery and removal of heavy equipment shall be conducted during off- peak hours to minimize the heavy truck activity during the morning and evening peak periods (7 to 9 am and 4 to 6 pm) in order to have nominal impacts to traffic and circulation near the vicinity of a project.

TR-3 During the site grading, where export of material is required, the construction contractor shall limit export activity between the hours of 7 to 9 am (morning peak period) and 4 to 6 pm (evening peak period) to fewer than the equivalent of 50 passenger car equivalent (PCE) truck trips per hour. 50 PCE truck trips equates to approximately 16 total trucks

(8 trucks in and 8 trucks out) during the peak periods specified above in order to limit the potential impacts of haul truck activity during these busy commute times:

50 PCE truck trips / 3.0 PCE factor = 16 total trucks during the peak hour

Conclusions: TVMWD finds that during construction of Strategic Plan projects, if construction would impact a road, the Watermaster Party proposing a project would be required to develop and implement a Traffic Control Plan prior to initiating construction. Such a plan shall be consistent with the appropriate city or county Emergency Response Plan as set forth in mitigation measures TR-1 through TR-3. Implementation of a Traffic Control Plan would ensure that impacts associated with the interruption of traffic that may adversely impact response times during construction would be less than significant.

Impact 4.14-3 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: There are no new road development projects associated with Project Category 1 projects. Improvements to project sites include rehabilitation and upgrades to wells and treatment facilities that are currently accessible from existing roads. Parking of construction and maintenance vehicles and equipment would occur on each of the project sites, or for brief periods during construction or scheduled maintenance during operation, may be parked at the curb adjacent to a project site. At such times, the construction contractor would be required to develop and implement a Construction Traffic Management Plan, approved by the respective jurisdiction in which the project site is located. Implementation of mitigation measures TR-1 through TR-3 for each project, as appropriate, would ensure that impacts would be less than significant.

Mitigation Measures

See Findings and Facts under Section E.2.11, Impact 4.14.1 mitigation measures TR-1 through TR-3.

Conclusions: TVMWD finds that during construction of projects, if construction would impact a road, the Watermaster Party proposing a project would be required to develop and implement a Construction Traffic Management Plan prior to initiating construction. Such a plan shall be consistent with the appropriate city or county Emergency Response Plan as set forth in mitigation measures TR-1 through TR-3. Implementation of a Construction Traffic Management Plan would ensure that impacts associated with the interruption of traffic that may adversely impact response times during construction would be less than significant.

E.2.12 Utilities/Service System/Energy

Impact 4.15.1 Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater, drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: The project sites are all located in urban areas so that the extension of utility systems to serve the sites would not likely be necessary. Construction activities associated with the installation of proposed improvements to sites in this project category include drilling, trenching, excavation or other ground disturbing activities to upgrade existing production wells and related pumps, monitoring systems, etc.; and new treatment facilities (ion exchange, biological treatment, or granular activated carbon treatment).

Wastewater Treatment

During construction of improvements at the project sites there would be no discharge to existing wastewater systems associated with the proposed projects. Portable toilets would be used at each site, and the sanitary wastes would be hauled from each site for appropriate disposal at a regional wastewater treatment facility. During operation, no employees will be working on site on a daily basis, so no restroom facilities would be required. Site inspections may occur on a daily basis where a water district or water company employee would enter the site to inspect operating conditions, but these site visits would be short, and no extended stay is anticipated that would require restroom facilities.

Water Treatment

Proposed improvements would result in increased groundwater production at some existing wells; and increased treatment capacity at existing sites either through the construction of or expansion of air stripping facilities; or ion exchange (IX), biological treatment facilities or granular activated carbon (GAC) facilities to remove constituents. The purpose is to provide additional pumping and treating of groundwater that would result in a more reliable and sustainable water resource for existing water customers. Therefore, implementation of these projects, would not require or result in the relocation or construction of new water treatment facilities, and a less than significant impact would occur.

Stormwater/Drainage

Project Category 1 project sites are all located in an urban area where storm drain infrastructure is in place. Upgrades to existing wells and treatment facilities, or development of new treatment facilities at existing sites could affect on-site drainage patterns as well as off-site drainage volume and require the construction and operation of new and/or expanded stormwater drainage facilities. However, because these sites are all located in an urban area where storm drain facilities are in place, the issue is one of control of stormwater runoff from a project site. Mitigation Measure USS-1 requires that prior to construction at a Although the *Noise Impact Analysis* evaluated the Strategic Plan and its related projects at a program level it was assumed that because proposed Project Category 1 projects are similar in function and type of equipment to existing conditions at these sites, a project's anticipated operational noise sources were assumed to generate unmitigated noise level contour boundaries that will largely be located within the boundaries of each site.

For Project Category 1 sites, the proposing Watermaster Party shall prepare a drainage plan, or update the existing drainage plan, that includes design features to reduce stormwater peak concentration flows exiting a site so that the capacities of the existing downstream drainage facilities are not exceeded. Such design features may include bioretention, sand infiltration, return of stormwater for treatment within the treatment plant, and/or detention facilities. Therefore,

implementation of a site-specific drainage plan as set forth in mitigation measure USS-1, would ensure that impacts associated with on-going operation of a Project Category 1 project would be less than significant.

Mitigation Measures

USS-1 Implementation of a Drainage Plan to Reduce Downstream Flows. Prior to construction of project facilities, the Watermaster Party proposing a project shall prepare a drainage plan that includes design features to reduce stormwater peak concentration flows exiting the above ground facility sites so that the capacities of the existing downstream drainage facilities are not exceeded. These design features could include bioretention, sand infiltration, return of stormwater for treatment within the treatment plant, and/or detention facilities.

Conclusions: TVMWD finds that with implementation of mitigation measure USS-1 for a Watermaster Party proposing a project to prepare and implement a drainage plan with design features to reduce stormwater peak concentration flows exiting the above ground facility sites so that the capacities of the existing downstream drainage facilities are not exceeded. These design features could include bioretention, sand infiltration, return of stormwater for treatment within the treatment plant, and/or detention facilities.

Impact 4.15.4 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; and comply with federal, state, and local management and reduction regulations related to solid waste?

Findings: Less than Significant Impact with Mitigation Incorporated

Facts:

Construction

Construction activities for Project Category 1 projects would all occur within sites that are already developed with wells and some treatment facilities. Therefore, solid waste generated during construction would mainly consist of small quantities of general construction and demolition (C&D) debris such as concrete or asphalt (if construction requires the removal of pavement to develop new treatment facilities), cardboard and wrapping material, worker personal waste (food wrappers, newspapers), and possibly green waste and excavated soils. Even small volumes of construction-related waste and inert demolition debris will require disposal during proposed project construction. The California Green Building Standards Code (CGBSC), requires that when construction and/or demolition is proposed, a Construction Waste Management Plan shall be implemented that results in the recycling and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste generated by a construction project. Where a local jurisdiction has more stringent ordinance, that ordinance would supersede the CGBSC. Therefore, mitigation measure USS-2 has been identified that requires the construction contractor to submit a C&D disposal plan to a City Public Works Department for review and approval, that identifies the C&D waste to be diverted from a landfill, and a facility where the C&D waste will be taken. Implementation of a site-specific C&D Disposal Plan would ensure that this impact would be less than significant.

Operation

During operation, the generation of solid waste would be minimal as most site visits would be for inspection only. Periodic maintenance may result in the generation of small amounts of material such as cardboard or other wrapping materials. This material would be taken off-site to a Watermaster Parties' corporate yard, or construction contractor's yard to be recycled along with other recyclable material in a recycling bin. Therefore, a less than significant impact is anticipated during operation of groundwater wells and treatment facilities.

Mitigation Measures

USS-2 Implementation of a Construction and Demolition Disposal Plan. Prior to commencement of construction, the contractor shall prepare a Construction and Demolition C&D) disposal plan for review and approval by the local jurisdiction where construction will occur. Per CGBC Section 45.408.1.1, *Construction Waste Management Plan*, the C&D Disposal Plan shall include the following elements:

1. Identifies the construction and demolition waste materials to be diverted from disposal by efficient usage, recycling, reuse on the project or salvage for future use or sale.

2. Determines if construction and demolition waste materials will be sorted on-site (source-separated) or bulk mixed (single stream).

3. Identifies diversion facilities where construction and demolition waste material collected will be taken.

4. Specifies that the amount of construction and demolition waste materials diverted shall be calculated by weight or volume, but not by both.

Conclusion: TVMWD finds that implementation of mitigation measures USS-2 to prepare and implement a Construction and Demolition Disposal Plan would reduce the amount of construction and/or demolition material that would otherwise go to a landfill. Diverting C&D material from landfills helps extend the life of landfills and increase the amount of C%D material that can be recycled and reused at other construction sites.

F. PROJECT CATEGORY 2 – STORMWATER AND SUPPLEMENTAL WATER RECHARGE

F.1 NO IMPACTS OR LESS THAN SIGNIFICANT IMPACTS IDENTIFIED IN THE FPEIR FOR PROJECT CATEGORY 2 PROJECTS

The following issues were identified in the Six Basins Strategic Plan FPEIR for Project Category 2 projects as having no impact or to have a less than significant impact and therefore no mitigation measures are required. All of these issues were fully addressed and substantiated in the FPEIR. All the following references are to findings in the Six Basins Strategic Plan DPEIR.

F.1.1 Aesthetics

Impact 4.1-1 Have a substantial adverse effect on a scenic vista?

Findings: Less Than Significant Impact

Facts:

Enhance Stormwater and Supplemental Water Recharge at the San Antonio Spreading Grounds

The recharge water includes stormwater, imported water, and potentially treated (recycled) water from the Pomona Water Reclamation Plant (WRP). Under existing conditions, the SASG are developed with aggregate mine pits, electricity transmission towers/lines, access roads, catch basins and associated water conveyance infrastructure in addition to the natural vegetation in the undisturbed areas. Views of the mountains from locations in the San Antonio Heights neighborhoods on the east side of the SASG are interrupted from some vantage points by the San Antonio Dam and Southern California Edison (SCE) Transmission towers. On the Los Angeles County side of the SASG looking east, views of the mountains and the SASG area are interrupted by berms and natural topography; the east side of Mt. Baldy Road is higher than the road and the neighborhoods west of Mt Baldy Road. Thus, views of the future recharge basin may not be adversely affected from a public vantage point.

To maximize recharge operations in the SASG, the Strategic Plan identified an additional recharge basin of approximately 50 acres excavated to a depth of up to 200 feet. The exact site is unknown at this time but would be developed within the upper reach of the SASG, below the San Antonio Dam and the existing basins on the Los Angeles County side of the SASG within the City of Claremont.

The excavated material from the new basin would be crushed on-site then conveyed across the SASG by a ground level conveyor to the existing Holliday Rock facility located on the east side of the San Antonio Creek Channel. It is estimated that the resulting recharge basin can be completed within three to five years, at which time the crusher and conveyor system would be removed and the basin will become operational.

Once operational as a recharge basin, this facility would be similar in design to the existing basins (at or below grade) and there would be no vertical structures associated with operation of the new recharge basin. Because the SASG slopes to the south, the new basin would likely represent a similar situation, that is, they would be near or below the grade of the adjacent neighborhood. Therefore, although the new basin may be within a public view of a scenic resource (San Gabriel Mountains) from some vantage points, it would not interrupt that view. Because of these factors, there would be no substantial adverse effect on an existing scenic vista associated with development and operation of the new basin in the SASG.

Enhance Stormwater and Supplemental Recharge at the Thompson Creek Spreading Grounds

Under existing conditions, PVPA uses two small pits (Coyote Pits) to percolate water. Combined, the Coyote Pits are less than 1 acre in size. In order to provide additional recharge capacity, the TCSG project calls for the expansion of the spreading grounds by approximately 25 acres to a depth of approximately 20 feet. The proposed location of the new recharge basins is generally south of the Thompson Creek Dam and north of the Thompson Creek Channel. Existing views from East Pomello Drive, adjacent to the south of the project site, are of the San Gabriel

Mountains in the background and in the foreground, natural vegetation and a line of SCE powerline towers and poles. Because East Pomello Drive is on a downward slope from the site, the area to be developed with recharge basins is not visible. Therefore, there would likely be no views of the future infrastructure at the TCSG facilities from the south.

Along Mills Road, looking west, views of the proposed project site are visible, however, the proposed recharge basins do not include vertical structures that would obscure views of the mountains. North of the dam at the terminus of Mills Road is an entrance to the Claremont Hills Wilderness Park (CHWP). The park abuts the PVPA Thompson Creek property on the north and west but there are no trails leading from the park to the site. Views of the site are visible from some vantage points along trails, however, under existing conditions, these views are of the dam and related infrastructure (e.g., concrete walls and channels). Therefore, although the new basins would be within the view of some trail users in the CHWP they would not interrupt views of a scenic resource (San Gabriel foothills and mountains). Because of these factors, there would be no substantial adverse effect to an existing scenic vista associated with development and operation of new basins at the TCSG project site.

Enhance Stormwater Recharge at the Pedley Spreading Grounds

The PSG site is located in the City of Claremont and owned by the City of Pomona. The approximately 20-acre site is located adjacent to an elementary school and single-family neighborhood on the east, and single-family neighborhoods on the north and south. To the west is a more rural residential area and the Rancho Santa Ana Botanical Gardens. The site includes recharge basins, two reservoirs, a pump house, treatment facility and unpaved roads around the site.

Stormwater and dry weather runoff would be collected in the existing underground storm drain system and conveyed to the PSG site through new pipeline interconnects between the storm drain system and the recharge basins. Increasing the size and depth of the recharge basins would be done at and below grade and the new conveyance (pipeline) would be underground. Therefore, improvements at the PSG site would not result in adverse impacts to visual resources including views of the San Gabriel foothills and mountains. Likewise, construction activities would also not adversely impact visual resources because such activities would be short term and no permanent structures would remain. Because of these factors, there would be no substantial adverse effect to an existing scenic vista associated with development and operation of new basins at the PSG site.

Recharge Stormwater and Supplemental Water at the LA County Fairplex

The proposed project is to utilize up to 10 acres at the LA County Fairplex to construct facilities to recharge stormwater and dry-weather runoff, and supplemental water into the Pomona Basin. Four new soccer fields are being proposed (independent of this project) that would overlay the underground infiltration gallery that would be designed to retain stormwater onsite, for infiltration and/or release into the Thompson Creek channel. Recharge water would be fed into the basins through underground pipelines. Therefore, visual resources including views of the San Gabriel foothills and mountains would not be adversely affected by this project.

Conclusions: TVMWD finds that none of the proposed *Supplemental and Stormwater Recharge Water Recharge* projects would result in a substantial adverse effect on a scenic vista, because

upon completion of construction recharge basins would be below grade so views would not be interrupted.

Impact 4.1-2 Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway?

Findings: No Impact

Facts: A review of Caltrans List of Officially Designated and Eligible Scenic Highways showed that there are no designated Scenic Highways within the Six Basins project area. The 210 Freeway is listed as being eligible, however, to date, it has not been officially designated. Therefore, there would be no impact to scenic resources as viewed from a State Scenic Highway.

Conclusions: TVMWD finds that none of the proposed *Supplemental and Stormwater Recharge Water Recharge* projects would result in damage to a scenic resource within a State Scenic Highway because no such highways have been identified in the Six Basins project area.

Impact 4.1-4 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Findings: Less than Significant Impact.

Facts: Project Category 3 projects consist of expanding stormwater and supplemental water recharge basins in the TCSG and PSG, and new facilities in the SASG and at the Los Angeles County Fairplex site. There are no structures such as water towers, tanks or light poles that would adversely impact the surrounding developed area in which they are located, and no lighting is proposed. Any glare that may be reflected off water in the basins would be minimal because the basins are not intended to be filled with water year-round, only during storm events or when supplemental water is being spread. During construction, lighting may be required intermittently if work crews must work after dark to complete a task. However, this is highly unlikely and therefore would constitute an incidental, short-term impact that would not be significant. Therefore, impacts associated with Project Category 3 projects in the Six Basins project area would be less than significant and no mitigation is required.

Conclusions: TVMWD finds that during construction of *Water Recharge*, lighting may be required intermittently if work crews must work after dark to complete a task. However, this is highly unlikely and therefore would constitute an incidental, short-term impact that would not be significant. Further, TVMWD finds that for operation of water recharge facilities no lighting is proposed.

F.1.2 Agricultural and Forestry Resources

Impact 4.2.1 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; or Conflict with existing zoning for agricultural use or a Williamson Act contract?

Finding: No Impact

Facts: A search of the California Department of Conservation, Farmland Mapping and Monitoring Program website https://www.conservation.ca.gov/dlrp/fmmp showed that there is no Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance in the project area. In the SASG, the area immediately below the San Antonio dam located within San Bernardino County, is classified as Grazing Land. The rest of the wash area in the City of Upland is classified as Other Land. In addition, the Los Angeles County map ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf, showed that the entire Six Basins project area within Los Angeles County is classified as Other Lands. Therefore, implementation of the Strategic Plan would not result in the conversion of farmland.

Conclusion: TVMWD finds that there is no zoning for agricultural use or impacts on sites under Williamson Act contracts that would be affected by *Supplemental and Stormwater Recharge Water Recharge* projects. A review of city zoning maps for the cities of Claremont, La Verne, Pomona, and Upland revealed that there are no project sites identified in the Strategic Plan that are zoned for agricultural uses or under Williamson Act contract. Therefore, implementation of the Strategic Plan and related projects would not result in any conflict with zoning for agricultural use or impact any sites under contract.

Impact 4.2-2 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)); or Result in the loss of forest land or conversion of forest land to non-forest use?

Finding: No Impact

Facts The Six Basins project area is located on an alluvial fan emanating from the San Gabriel Mountains. The overlying land uses are largely urban/suburban and there are no forest lands designated within any of the jurisdictions that control land use within the Six Basins project area. Therefore, implementation of the Strategic Plan and related projects would not result in the loss of forest land or conversion of forest land to non-forest use.

Conclusions: TVMWD finds that implementation of any of the *Supplemental and Stormwater Recharge Water Recharge* projects would not 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 because the overlying land uses are largely urban/suburban and there are no forest lands designated within any of the jurisdictions that control land use within the Six Basins project area.

Impact 4.2-3 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?

Findings: No Impact

Facts: Implementation of the Strategic Plan would not result in impacts on farmland or forest land as there are no properties with this designation within the Six Basins project area. There are a few remnant groves located within the Canyon Basin area, however, none of the projects

identified in the Strategic Plan would be located within this basin. Therefore, there would be no impact.

Conclusions: TVMWD finds that implementation of *Supplemental and Stormwater Recharge Water Recharge* projects would not result in conversion of farmland, to non-agricultural use or conversion of forest land to non-forest use because none of these project sites support agriculture or forest/timber lands.

F.1.3 Air Quality/GHG/Global Climate Change

Impact 4.3-3 Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?

Findings: Less Than Significant Impact

Facts: Potential odor sources associated with proposed projects may result from construction equipment exhaust during construction activities. The temporary storage of typical solid waste (refuse) may also cause odors, however, during construction, contractors would be responsible for maintaining a clean orderly site as set forth in site-specific Stormwater Pollution Prevention Plans (SWPPP) (see Section F.2.8 below). Any construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the lead agency's solid waste regulations. Therefore, odors associated with the proposed project construction and operations would be less than significant and no mitigation is required.

Conclusions: TVMWD finds that impacts associated with implementation of Project Category 2 projects would be temporary during construction, and that odors can be controlled through good housekeeping on site. Further, any construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. Therefore, odors associated with the proposed project construction and operations would be less than significant and no mitigation is required.

Impact 4.3-6 Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Findings: Less Than Significant Impact

Facts: Proposed Strategic Plan projects including *Supplemental and Stormwater Recharge Water Recharge* projects generally consist of construction activity and do not include trip-generating land uses (residential. commercial, industrial) or facilities that would generate any substantive amount of on-going GHG emissions. Short-term GHG emissions associated with the 13-month construction schedule for the three projects selected to represent a worst-case scenario, are below the 3,000 MTCO2e/year screening threshold. Therefore, the proposed projects would not generate a significant amount of GHG emissions. The proposed Strategic Plan projects including Project Category 2 projects would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Impacts are less than significant in this regard.

Conclusions: TVMWD finds that Project Category 3 projects would not generate a significant amount of GHG emissions and therefore would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

F.1.4 Biological Resources

Impact 4.4-5 Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Findings: Less Than Significant Impact

Facts: None of the *Supplemental and Stormwater Recharge Water Recharge* project sites are located in an area covered by a Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, there would be no impact associated with *Supplemental and Stormwater Recharge Water Recharge* projects.

Conclusions: TVMWD finds that because no conservation plans have been identified in areas where Project Category 2 projects sites are proposed, there would be no conflict.

F.1.5 Cultural Resources

Impact 4.5-4 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).

Findings: No Impact

Facts: There are no existing sites in this category of projects that are listed or eligible for listing on the California Register of Historical Resources, or in a local register of historical resources. Therefore, there is no impact associated with implementation of Project Category 2 projects.

Conclusions: TVMWD finds that there is no impact associated with the development of new Project Category 2 projects because the sites are not listed or eligible for listing on the California Register of Historical Resources, or in a local register of historical resources.

F.1.6 Environmental Justice

Impact 4.6-2 Result in a disproportionate decrease in the employment and/or economic base of minority and/or low-income populations of working or residing in the area surrounding the project area?

Findings: Less Than Significant Impact

Facts: Development of new Project Category 2 projects would not result in a decrease in employment and/or economic base of minority and/or low-income populations because none of the proposed projects include the displacement of any urban uses (e.g., residential, commercial, institutional) that would result in the loss of jobs.

Conclusions: TVMWD finds that Project Category 2 projects would not adversely affect employment and/or the economic base of minority and/or low-income populations because none of these projects would result in the displacement of any employment opportunities.

Impact 4.6-3 Present opportunities to address existing disproportionate impacts on minority, low-income, or indigenous populations that are addressable through the project?

Findings: No Impact

Facts: The proposed Strategic Plan and related projects are neutral on the issue of disproportionate impacts on minority, low-income, or indigenous populations. The intent of the Strategic Plan is to address water supply and water quality issues throughout the Six Basins project area regardless of residents' race or income status. Therefore, implementation of the Strategic Plan and related projects would not present such opportunities.

Conclusions: TVMWD finds that *Supplemental and Stormwater Recharge Water Recharge* projects would not disproportionately impact minority, low-income, or indigenous populations because the Strategic Plan addresses water supply and water quality issues throughout the Six Basins project area regardless of residents' race or income status. Therefore, implementation of the Strategic Plan and related projects would not present such opportunities.

F.1.7 Geology/Soils/Paleontological Resources/ Mineral Resources

Impact 4.7-5 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?

Findings: No Impact

Facts: Implementation of the Strategic Plan and its related projects does not include facilities that would require the use of septic systems. There is no planned use of a project site that would require employees to be on-site for extended periods that would require the use of restroom facilities, and none are planned at any of the sites. Therefore, no impact would occur relative to soil suitability for septic tanks or alternative wastewater disposal systems.

Conclusions: TVMWD finds that Project Category 2 projects would not require the use of septic systems because there is no planned use of a project site that would require employees to be on-site for extended periods. Therefore, no restroom facilities are planned at any of the sites.

Impact 4.7-7 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 loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

Findings: Less Than Significant Impact

Facts: Stormwater and Supplemental Water Recharge projects that may affect mineral resources are associated with new recharge basins in the SASG and TCSG.

San Antonio Spreading Grounds

This project would provide recharge capacity within an approximately 50-acre area to a depth of up to 200 feet. The excavated material would be crushed on-site then conveyed across the SASG to the existing Holliday Rock facility located on the east side of the San Antonio Channel. It is estimated that approximately 20 million tons of aggregate material would be excavated with

typical aggregate mining equipment (dozers, scrapers) and hauled to a portable crusher within the excavation area over a five-year period (2.5 million tons per year). Excavation can be completed within three to five years at which time the crusher and conveyor system would be removed, and the basin would become operational. Therefore, the development of a new recharge basin and related infrastructure in the SASG would result in an opportunity to recover available aggregate material resources.

Operation of the new SASG recharge basin would not preclude extraction of additional aggregate material from other locations within the SASG, generally located east of the San Antonio Creek channel. Therefore, at the new SASG site, there would be a less than significant impact on mineral resources.

Thompson Creek Spreading Grounds

Development of this project would require the extraction of aggregate material to create a new recharge basin of approximately 25 acres to a depth of up to 20 feet. Operation of these basins would not preclude extraction of additional aggregate material during maintenance of the basins over time to maximize percolation rates. Therefore, at the TCSG project site, there would be a less than significant impact on mineral resources.

Specifically, regarding 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 available mineral resources would be affected by the implementation of the proposed Strategic Plan within the cities of La Verne or Pomona, or within the portion of the Los Angeles County East San Gabriel planning area that overlays the Six Basins project area. Likewise, the Six Basins projects would not affect mineral resources in unincorporated areas of San Bernardino County.

Conclusions: TVMWD finds that the recovery of aggregate resources during the excavation for the SASG and TCSG recharge basins is a beneficial effect in that it will provide construction material for future residential and non-residential projects in the future. Further, TVMWD finds that Project Category 2 projects would not preclude aggregate resources to continue to be recovered from existing sites located east of the San Antonio Creek Channel.

F.1.8 Hazards/Hazardous Materials/Airport Safety/Wildfire

Impact 4.8-2 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Findings: Less Than Significant Impact

Facts: None of the Project Category 2 sites are located within ¼ mile of a school site with the exception of the Pedley Spreading Grounds site (this site is discussed in Section F.2.8 below. Construction activities would require the transport, use, and disposal of hazardous materials including gasoline, diesel fuel, hydraulic fluids, and other similarly related materials, generally in support of heavy equipment (e.g., dozer, excavator, backhoe, water truck) operation. Construction would include grading, excavation, and trenching to create water recharge basins and related infrastructure.

Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction projects, and there would be no greater risk for improper handling, transportation, or spills associated with any of the Project Category 2 projects than would occur on any other similar construction site.

Where mandatory compliance with applicable hazardous materials regulations is assumed, construction of new or expansion of existing basins for groundwater recharge would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials or waste during the construction phase. Therefore, a less than significant impact on the environment would occur.

Conclusions: TVMWD finds that Project Category 2 projects at the SASG, TCSG and Fairplex sites are not located within ¼ mile of a school site.

F.1.9 Land Use/Planning

Impact 4.10-1 Physically divide an established community?

Findings: No Impact

Facts: Project Category 2 projects would all be constructed and operated in areas where water recharge activities already occur and that would be expanded; or in the case of the Fairplex site, within the footprint of an established fairgrounds complex. The areas proposed for spreading in the SASG, TCSG and PSG are located in proximity to existing residential neighborhoods but are located on sites accessible from existing roads, such that no new roads are proposed to be developed that would divide an existing community. Therefore, there would be no impact associated with implementation of the Strategic Plan or related projects.

Conclusions: TVMWD finds that Project Category 2 projects would all be constructed and operated in areas where water recharge activities already occur and that would be expanded; or in the case of the Fairplex site, within the footprint of an established fairgrounds complex. Therefore, none of these projects would divide a community.

Impact 4.10-2 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?

Findings: Less Than Significant Impact

Facts: Findings for consistency with local jurisdictions plans/policies are made in Section F.2.1, *Aesthetics*, and Section F.2.3. *Biological Resources,* Section F.2.4, *Cultural Resources*, Section F.2 9 *Noise*, Section F.2.11 *Transportation*, where impacts would be less than significant with mitigation incorporated.

The Findings for consistency with regional or State planning documents or rules/regulations are included in the following sections: F.2.2, *Air Quality/Greenhouse Gases/Global Climate Change*, for consistency with the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP), F.2.6, *Geology/Soils/Mineral Resources/ Paleontological Resources*, for consistency with the California Building Standards Code, F.2.7, *Hazards/Hazardous Materials/Airport*

safety/Wildfires, for consistency with Airport Land Use Plans, and F.2.8, *Hydrology and Water Quality*, for consistency with Regional and State Water Quality Standards.

Therefore, the Land Use section of the DPEIR was limited to the analysis of the consistency of proposed Strategic Plan projects to the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategies. (RTP/SCS).

Conclusions: TVMWD finds that the analysis of the potential for Project Category 2 projects to conflict with SCAG's RTP/SCS goals for regional transportation showed that construction and operation of these projects would create a minimal number of trips associated with on-going operation and maintenance spreading grounds. The Strategic Plan was found to be consistent with the goals of the RTP/SCS or that no inconsistencies were identified.

F.1.10 Noise

Impact 4.11-2 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?

Findings: Less Than Significant Impact

Facts: The Strategic Plan does not include any residential land use, therefore implementation of Project Category 2 projects would not include any new residents that would be adversely affected by proximity to an airport or private airstrip. In addition, proposed projects identified in the Strategic Plan do not include any sites where permanent employees would be located. Once construction is complete, operation and maintenance tasks would be performed by workers working on site intermittently and not for extended periods. When on a site located within the AIA of one of the airports, workers may occasionally hear airplanes pass by overhead however, they would not be exposed to substantial, long-term airport-related noise. Therefore, the proposed Project Category 2 projects would not expose persons to excessive airport-related noise levels. Exposure to airport noise would be a less than significant impact.

Conclusions: TVMWD finds that proposed Project Category 2 projects would not expose persons to excessive airport-related noise levels because none of the projects include residents or employees on site.

F.1.11 Population/Housing

Impact 4.12-1 Would the project 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)?

Findings: No Impact

Facts: Project Category 2 projects consist of new recharge basins in the SASG and TCSG, expanded basins in the PSG, and a new underground infiltration gallery at the Los Angeles County Fairplex. There are no new homes or businesses associated with the proposed improvements to SASG, TCSG or PSG sites. Likewise, the Fairplex site is a developed fairgrounds venue and there are no plans to include new homes or other new habitable structures. Therefore, there would be

no population or housing impact in the Six Basins project area associated with Project Category 2 projects.

Conclusions: TVMWD finds that because there are no new homes or businesses associated with Project Category 2 projects, they would not induce substantial unplanned population growth either directly or indirectly.

Impact 4.12-2 Would the project displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere?

Findings: No Impact

Facts: Project Category 2 consist of new stormwater and supplemental water recharge basins in the SASG and TCSG, expanded basins in the PSG, and a new underground infiltration gallery at the Los Angeles County Fairplex. None of these sites are occupied by residences. Therefore, proposed stormwater and supplemental water recharge would not require the construction of replacement housing elsewhere, and there would be no housing impact in the Six Basins project area associated with Project Category 2 projects.

Conclusions: TVMWD finds that because there are no new homes or businesses associated with Project Category 2 projects, they would not require the construction of replacement housing elsewhere, and there would be no housing impact in the Six Basins project area associated with Project Category 2 projects.

F.1.12 Public Services/Recreation

Impact 4.13-2 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; or include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Findings: No Impact

Facts: None of the Project Category 2 projects would result in new residents or a significant increase in employment opportunities that would result in an increase in population. Therefore, there would be no increase in the use of existing neighborhood and regional parks or other recreational facilities that would result in physical deterioration; and as such, there would be no impact.

Likewise, implementation of the Project Category 2 projects would not require the construction or expansion of recreational facilities. However, the County of San Bernardino has proposed a recreational trail that would traverse the San Antonio Creek Wash in a north-south direction, connecting to the County's proposed Frontline Trail on the north along the foothills of the San Gabriel Mountains and the Santa Ana River Trail on the south.

The proposed San Antonio Creek Trail is not a project defined in the Strategic Plan and the County of San Bernardino is not a Six Basins Watermaster Party. The County has not requested that the trail be developed in association with the new SASG recharge basins. Therefore, if the trail were to be developed the County would have to design it to be consistent with the ultimate design of the SASG recharge basin.

Conclusions: TVMWD finds that the construction and operation of Project Category 2 projects would not result in an increase in the use of parks or recreation facilities because no new residents or employees are associated with these projects. Further, TVMWD finds that the future County trail is too speculative at this time, but that future development would require that it be designed so that the SASG recharge basin is not impacted.

F.1.13 Transportation

Impact 4.14-2 Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Findings: No Impact

Facts: CEQA Guidelines Section 15064.3(b) sets forth the criteria for analyzing transportation impacts. Specifically, this section of the Guidelines focuses on land use projects and associated vehicle miles traveled. This assumes a project has either residents or employees that travel to and from a project site on a daily basis. Subsection (b)(4) describes a lead agency's discretion in choosing the most appropriate methodology to evaluate a project's vehicle miles traveled.

Upon completion of construction activities, proposed Project Category 2 projects would generate negligible vehicle miles traveled because once constructed, vehicle trips would be limited to scheduled maintenance. No substantial number of daily vehicle trips are associated with the ongoing operation of Project Category 2 projects because there are no permanent residents or employees associated with project operation at any of the sites. Therefore, operation of these projects would not conflict or be inconsistent with the intent of CEQA Guidelines Section 15063(b).

Conclusions: TVMWD finds that because there are no permanent residents or employees associated with project operation at any of the Project Category 2 sites. Therefore, operation of these projects would not conflict or be inconsistent with the intent of CEQA Guidelines Section 15063(b).

F.1.14 Utilities/Service Systems/Energy

Impact 4.15.1 Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater, drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?

Findings: Less Than Significant Impact

Facts: Project Category 2 projects represents improvements that would be undertaken to enhance stormwater recharge and supplemental water recharge; or create new recharge basins.

Wastewater Treatment

During construction of improvements at the project sites there would be no discharge to existing wastewater systems associated with the proposed projects. Portable toilets would be used at each site, and the sanitary wastes would be hauled from each site for appropriate disposal at a regional wastewater treatment facility. Likewise, during long term operation of water recharge facilities, there would be no employees on site on a daily basis that would require restroom facilities. Site inspections may occur on a daily basis where a water district or water company

employee would enter the site to inspect operating conditions, but these site visits would be short, and no extended stay is anticipated that would require restroom facilities. During construction, portable toilets and hand wash stations would be delivered to a site and serviced (pumped and transported off site) by a professional service provider. Therefore, there would be no impacts to wastewater treatment systems.

Water Treatment

Implementation of the Strategic Plan would result in the creation of new recharge basins. Proposed improvements would result in increased groundwater recharge capacity. There are no water treatment facilities associated with the SASG or TCSG projects. However, both the PSG and Fairplex projects are groundwater recharge projects that would use stormwater from existing storm drains and channels for recharge (MS4 projects). This water would be pretreated at each site prior to being released for recharge. Water treatment is inherent in the implementation of the two MS4 recharge projects that would not result in the need to construct new separate water treatment facilities. Therefore, this impact would be less than significant, and no mitigation is required.

Stormwater/Drainage

Two of the project sites (SASG and TCSG) are located in wash areas where no storm drain facilities exist. The purpose of these two projects is to develop new groundwater recharge basins in order to receive an increased amount of stormwater, supplemental water, and at the SASG site, to receive recycled water from the Pomona WRP to recharge the groundwater basin. The intent is to capture, pretreat, and detain this water on site in order to recharge the groundwater basin, so that no stormwater runoff is anticipated.

The PSG site is located in an urban area where storm drain infrastructure is in place. The existing basins would be deepened to accommodate local urban runoff from existing storm drain pipes in the surrounding neighborhood. The intent of this project is to receive and detain this water on site in order to recharge the groundwater basin, so that no stormwater runoff is anticipated.

Finally, the Fairplex project would be developed as an underground infiltration gallery that would be located under the new soccer fields at the Fairplex grounds. Drainage from Arrow Highway would flow via gravity into the infiltration gallery. A second gravity connection is proposed at a new catch basin to be located adjacent to Thompson Creek (concrete channel running adjacent on the east side of the Fairplex), which will flow into a hydrodynamic separator for pretreatment before being conveyed into the infiltration gallery. A third connection would flow via pump well from McKinley Avenue into the infiltration basin. Water in the infiltration gallery would be captured and used on site to recharge groundwater. During storm events where the inflow exceeds outflow, water from the infiltration gallery would flow back into Thompson Creek as treated stormwater from the Fairplex site.

Each of the Project Category 2 projects are intended to capture surface water, accept supplemental water, or accept recycled water in order to detain and percolate water to recharge the groundwater basin. Therefore, there would be no impact to existing storm drain systems with the development of this category of project.

Electric Power

During construction, electric power may be available from local SCE power lines. However, equipment that requires additional power will be from diesel generators. Some equipment may also use gasoline. None of these fuels will be stored on site, instead they will be brought to the site when needed to refuel equipment. Once construction is completed, operation of the facility will utilize electric power from the grid.

Natural Gas

During construction and operation, no natural gas will be use at any of the project sites. Therefore, there would be no impact.

Telecommunications

During construction and operation, no telecommunications infrastructure would be required. Therefore, there would be no impact.

Conclusions: TVMWD finds that Project Category 2 projects would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater, drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects.

Impact 4.15-2 Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Findings: Less Than Significant Impact

Facts: Project Category 2 projects, are intended to ensure the continued availability of water supplies in the Six Basins project area. Increasing the size of groundwater recharge basins (TCSG and PSG), developing a new recharge basin (SASG), or developing a new facility at the Fairplex would assist the Watermaster Parties in maintaining and enhancing the sustainable yield and water quality in the Six Basins project area to meet the service needs of Watermaster Parties during normal, dry, and multiple dry years.

Conclusions: TVMWD finds that the intent of the Strategic Plan, and Project Category 2 projects is to increase the reliability and sustainability of water supply within the Six Basins project area by upgrading existing groundwater production wells to increase capacity, and to upgrade or develop new treatment facilities at these sites in order to treat local groundwater to drinking water standards. Therefore, Project Category 2 projects would have a less than significant impact to the water supply.

Impact 4.15.3 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?

Findings: No Impact

Facts: During construction of improvements at the Project Category 2 project sites there would be no discharge to existing wastewater systems associated with the proposed projects. Portable toilets would be used at each site, and the sanitary wastes would be hauled from each site for appropriate disposal at a regional wastewater treatment facility. Likewise, during long term operation of water recharge facilities, there would be no employees on site on a daily basis that would require restroom facilities. Site inspections may occur on a daily basis where a water district or water company employee would enter the site to inspect operating conditions, but these site visits would be short, and no extended stay is anticipated that would require restroom facilities. Therefore, none of the projects represent a projected demand for wastewater treatment, and there is no impact on a wastewater treatment provider's ability to serve existing commitments. During construction, portable toilets and hand wash stations would be delivered to a site and serviced (pumped and transported off site) by a professional service provider.

Conclusions: TVMWD finds that during construction and operation of Project Category 2 projects there would be no impact on wastewater treatment providers because these projects would not result in any new residents or employees at project sites.

Impact 4.15.5 Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Findings: Less Than Significant Impact

Facts:

Construction

The Energy Analysis prepare for the Program EIR (Final EIR Appendix H) concluded that the estimated power cost of on-site electricity usage during the construction of Strategic Plan projects is approximately $72,745.51. Additionally, based on the assumed power cost, it is estimated that the total electricity usage during construction is calculated to be around 759,467 kWh.

Construction equipment used by the project would result in single event consumption of approximately 116,359 gallons of diesel fuel. Construction equipment use of fuel would not be atypical for the type of construction proposed because there are no aspects of the project's proposed construction process that are unusual or energy-intensive, and project construction equipment would conform to the applicable CARB emissions standards, acting to promote equipment fuel efficiencies.

CCR Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Best available control measures inform construction equipment operators of this requirement. Enforcement of idling limitations is realized through periodic site inspections conducted by City building officials, and/or in response to citizen complaints.

Construction worker trips would result in the estimated fuel consumption of 6,834 gallons. Additionally, fuel consumption from construction vendor trips will total approximately 6,590

gallons. Diesel fuel would be supplied by local and regional commercial vendors. Indirectly, construction energy efficiencies and energy conservation would be achieved through the use of bulk purchases, transport and use of construction materials. The 2019 Integrated Energy Policy Report (IEPR) released by the California Energy Commission (CEC) has shown that fuel efficiencies are getting better within on and off-road vehicle engines due to more stringent government requirements. As supported by the preceding discussions, construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

Operations

Maintenance of proposed Project Category 2 projects would include remote monitoring via Watermaster Party computer systems, meter readings, routine inspections and maintenance of facilities, periodic testing, and emergency repairs. Maintenance activities would occur on an as-needed basis (1 trip per week was assumed). The operation of a pump station (well) as well as vehicle trips by maintenance staff would require the consumption of energy resources in the form of electricity and vehicle fuels. However, electricity and fuel consumption would not be wasteful, inefficient, or unnecessary as maintenance activities would only occur as necessary for well pump operation. Therefore, no operational energy impacts would occur.

SB 100 mandates 100 percent clean electricity for California by 2045. SCE has achieved over 46 percent Carbon-Free energy sources as of the 2018 Suitability Report. As the proposed project would be powered by the existing electricity grid (SCE), the project would eventually be powered by renewable energy mandated by SB 100 (50 percent by 2026 and 100 percent by 2045) and would not conflict with the statewide plan. TVMWD, for example, has not yet adopted specific renewable energy or energy efficiency plans with which the project could comply. Nonetheless, the project would not conflict with or obstruct the State plan for renewable energy; therefore, no impact would occur.

Conclusions: TVMWD finds that in recognition of the project's objective which is to construct facilities necessary for Watermaster Parties to meet their customers' current and projected water demands, the required energy use is not anticipated to result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

F.2 IMPACTS THAT WOULD BE LESS THAN SIGNIFICANT IMPACTS WITH IMPLEMENTATION OF MITIGATION MEASURES IDENTIFIED IN THE FPEIR FOR PROJECT CATEGORY 2 PROJECTS

F.2.1 Aesthetics

Impact 4.1-3 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 a 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?

Findings: Less than Significant Impact with Mitigation Incorporated

Facts: Project Category 2 projects consist of expanding stormwater and supplemental water recharge basins in the TCSG, and at the existing PSG, and a new recharge facility at the SASG and

the Los Angeles County Fairplex site. There are no structures such as water towers, tanks or light poles that would adversely impact the surrounding developed area in which they are located, and no lighting is proposed. In the short term, during construction, grading and excavation to create the new recharge basins would remove existing vegetation. This could result in a change in views of the sites from locations where public views of the project sites area available. This would apply generally to the new recharge basins in the SASG and TCSG. Although, both sites are already developed with water conservation and flood control facilities, they are located in areas that are heavily vegetated. Removal of vegetation and replacement with recharge basins may result in an adverse impact on visual character. Therefore, prior to approval of the final design of the SASG and TCSG recharge basins, the Watermaster Party undertaking the project shall design the facilities (mitigation measure AES-1) to include landscaping around the basins where views may be affected.

The PSG site is in an area with perimeter vegetation that obscures the site from public view. While the proposed facilities at the Fairplex project would be developed underground. Therefore, these two projects would not substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Mitigation Measures

See Findings and Facts under Section E.2.1, Impact 4.1-1 mitigation measure AES-1.

Conclusions: TVMWD finds that implementation of mitigation measure AES-1 can reduce potential adverse impacts associated with Project Category 2 projects at the TCSG and SASG sites on the existing visual character or quality of public views to a level of less than significant. This measure would minimize impacts to scenic vistas by working with the local jurisdiction to meet local design standards. Design of proposed facilities consistent with local design standards to the extent feasible taking into account the needs of the project would result in a less than significant impact to visual character and public views.

F.2.2 Air Quality/GHG/Global Climate Change

Impact 4.3-1 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?

Findings: Less Than Significant with Mitigation Incorporated

Facts: As described in Findings Section E.2.2 above, the Air Quality Impact Analysis assumed a set of projects that when constructed over a 13-month period, would represent a worst-case scenario regarding air emissions. The estimated maximum daily construction emissions with implementation of mitigation measures are summarized on Table 1 in Section E.2.2. Under the assumed scenario emissions resulting from construction activities would not exceed criteria pollutant thresholds established by the South Coast Air Quality Management District (SCAQMD) for emissions of any criteria pollutant. This conclusion assumes compliance with all applicable SCAQMD Rules for construction activities. Mitigation measures AQ-1 through AQ-3 shall be implemented during construction activities at Project Category 2 project sites.

During operation, long-term air quality impacts occur from mobile source emission generated from project-related traffic inspections (daily or weekly). Maintenance activities may consist of

basin restoration where grading equipment would be brought in when the bottom of a basin needs to be graded to remove silt and debris to restore functionality. Maintenance activities would utilize similar equipment to that used for construction of the basins. Therefore, mitigation measures for construction of recharge basins would also apply when such maintenance is required.

Mitigation Measures

See Findings and Facts under Section E.2.2, Impact 4.3-1 mitigation measures AQ-1 through AQ-3 to control air emissions during construction.

Conclusions: TVMWD finds that with implementation of Air Quality mitigation measures AQ-1 through AQ-3 construction and operation of Strategic Plan projects including Project Category 2 projects, would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in non-attainment with implementation of mitigation measures.

Impact 4.3.2 Expose sensitive receptors to substantial pollutant concentrations?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Sensitive receptors were considered in the evaluation of proposed Strategic Plan projects including Project Category 2 projects under Impact 4.3.1. The proposed projects were evaluated using SCAQMD's Localized significance thresholds (LST). The analysis concluded that emissions of criteria pollutants during construction would exceed the LST for fugitive dust (PM10). Therefore, mitigation measures AQ-1 and AQ-3 were identified that requires construction contractors to comply with SCAQMD rules including adhering to applicable measures contained in Rule 403Table 1. This table is included in the Mitigation Monitoring and Reporting Program (MMRP) for each category of projects. In addition, construction contractors are also required to comply with CARB requirements for off-road diesel construction equipment to comply with EPA/CARB Tier 4 emissions standards or equivalent. Construction contractors at each site will be responsible for compliance with mitigation measures as set forth in the MMRP for each category of project. There were no significant impacts associated with the long-term operation of any of the Project Category 2 projects.

Mitigation Measures

See Findings and Facts under Section E.2.2, Impact 4.3-1 mitigation measures AQ-1 through AQ-3 to control of air emissions during construction.

Conclusions: TVMWD finds that construction and operation of Strategic Plan projects, would not result in the exposure of sensitive receptors to substantial pollutant concentrations with iimplementation of mitigation measures A-1 through AQ-3. This will ensure that the generation of fugitive dust (PM10) and other pollutants during construction would remain at levels that are less than significant. Further, TVMWD finds that project operations would not exceed SCAQMD thresholds, and the project would not violate an air quality standard or contribute to an existing violation. Where maintenance of recharge basins requires grading to restore basin functionality, the construction contractor is required to comply with mitigation measures AQ-1 through AQ-3 as set forth in the MMRP for Project Category 2. Therefore, project operations would not result in the exposure of sensitive receptors to substantial pollutant concentrations that are above SCAQMD's LST thresholds.

Impact 4.3.4 Conflict with or obstruct implementation of the applicable air quality plan?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: See Findings and Facts under Section E.2.3, Impact 4.3-4 for a discussion of consistency with the SCAQMD AQMP.

Mitigation Measures

See Findings and Facts under Section E.2.2, Impact 4.3-1 mitigation measures AQ-1 through AQ-3.

Conclusions: TVMWD finds that the construction and operation of proposed Project Category 2 projects would not result in or cause NAAQS or CAAQS violations with implementation of mitigation measures AQ-1 through AQ-3. The Watermaster Parties are not proposing land uses that would result in the generation of excessive criteria pollutants either during construction or operation. The proposed Project Category 2 projects are therefore considered to be consistent with the AQMP.

Impact 4.3-5 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Findings: Less Than Significant Impact with Mitigation Incorporated

Construction

Project construction actvities would generate carbon dioxide (CO2), methane (CH4) and nitrous oxide (N2O) emissions. Construction would generate a total of approximately 1,222.28 $MTCO_2e/yr$. The analysis assumed the implementation of mitigation measures AQ-1 through AQ-3 during construction. As such, with mitigation, project construction would not exceed the SCAQMD's recommended numeric threshold of 3,000 $MTCO_2e/yr$ if it were applied. Thus, project-related emissions associated with the construction scenario used to analyze air quality would not have a significant direct or indirect impact on GHG and climate change and no mitigation or further analysis is required.

Operations

In terms of operational GHG emissions, there are no buildings associated with Project Category 2 projects. Therefore, there would be no permanent source or stationary source emissions. While it is anticipated that such projects would require intermittent inspection to be efficient, such inspections would be minimal requiring a negligible amount of traffic trips on an annual basis. Where maintenance of recharge basins requires grading to restore basin functionality, the construction contractor is required to comply with mitigation measures AQ-1 through AQ-3 as set forth in the MMRP for Project Category 2. Therefore, Project Category 2 project operations would not generate a significant amount of GHG emissions.

Mitigation Measures

See Findings and Facts under Section E.2.2, Impact 4.3-1 mitigation measures AQ-1 through AQ-3.

Conclusions: TVMWD finds that the construction and operation of proposed Project Category 2 projects would not exceed the SCAQMD's recommended numeric threshold of 3,000 $MTCO_2e/yr$ with implementation of mitigation measures AQ-1 through AQ-3 for the control of construction related GHG emissions. Therefore, operation of Project Category 2 projects would not exceed the SCAQMD's recommended numeric threshold.

F.2.3 Biological Resources

Impact 4.4-1 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.

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: The Biological Resources Assessment for the Six Basins Strategic Plan focused on two project study areas that would not be built in developed areas and that supported native habitat: SASG and TCSG project areas.

San Antonio Creek Spreading Grounds

The California Natural Diversity Database (CNDDB) mapped this area as supporting Riversidean Alluvial Fan Sage Scrub (RAFSS) habitat and the Biological Resources Assessment (DPEIR Appendix C) characterized the habitat as mature RAFSS habitat. This is because the area is no longer subject to major storm events and only receives flood waters during extreme storm events. RAFSS habitat no longer exists within the project area's 100-year floodplain as a result of flood control features including the San Antonio dam, concrete lined San Antonio Creek channel and the existing recharge basins. Therefore, the habitat is no exposed to scouring and thus has continued to mature (type convert) over decades into woodier vegetative structure normally associated with chaparral habitats. Two species of ceanothus (*Ceanothus crassifolius* and *Ceanothus leucodermis*), chaparral species, were identified on the project sites. Plant cover in these mature alluvial habitats usually exceeds 75 percent. This lack of open habitat in mature RAFSS precludes many of the sensitive species associated with the less dense areas classified as pioneer and intermediate RAFSS habitats from occurring.

Critical Habitat

According to the CNDDB, no sensitive habitat, including USFWS designated critical habitat, occurs within or adjacent to either the SASG or TCSG project study area.

Sensitive Plant Species

In 2020, a Jericho Systems botanist conducted surveys on foot with 100 percent visual coverage of the approximately 195-acre project study area. Species for which the survey was conducted included Nevin's barberry (*Berberis nevenii*), Plummer's mariposa-lily (*Calochortus plummerae*), Thread-leaved Brodiaea (*Brodiaea filifolia*), and Slender-horned Spineflower (*Dodecahema leptoceras*). Both project study areas contain suitable habitat for each of these species, but none

of these species were observed during the field visits at either site and are considered absent from the project area.

Sensitive Wildlife Species

In 2020, a Jericho Systems biologist also conducted surveys across the 195-acre SASG project study area. Based on the CNDDB search, the following species may be found within each of the project areas: arroyo toad, foothill yellow-legged frog, southern mountain yellow-legged frog, coastal California gnatcatcher (CAGN), burrowing owl, Santa Ana sucker, and San Bernardino kangaroo rat. Arroyo toad, foothill yellow-legged frog, southern mountain yellow-legged frog, and Santa Ana sucker are all dependent on water flows. The San Antonio Creek has been dammed and channelized in a concrete-lined channel. Therefore, there is no suitable habitat within the project area. The project study area does not support coastal sage scrub habitat, therefore CAGN would not be found within the SASG study area. Likewise, the site does not provide suitable habitat for the San Bernardino kangaroo rat or burrowing owl. In summary, no State and/or federally listed threatened or endangered species or other sensitive species were observed within the SASG project study area during field surveys and due to existing conditions, such species are unlikely to occur within the SASG project area. Although no protocol surveys were conducted for sensitive species, the lack of suitable habitat for these species they were presumed to be absent from the study area. However, because the start date for construction, and the specific site are unknown, prior to commencement of construction activities, the Watermaster Party proposing the SASG project shall have a Biological Resources Assessment completed per mitigation measure BIO-3.

Nesting Birds

The SASG project study area and immediate surrounding areas contain habitat suitable for nesting birds. Therefore, prior to any site disturbance, a survey for nesting birds must be conducted, including clearing, and grubbing, during the nesting season to avoid potentially taking of any birds or active nests. In general, impacts to all bird species (common and special status) can be avoided by conducting work outside of the nesting season (generally March 15th to September 15th), and conducting worker awareness training. Mitigation measures BIO-1a, BIO-1b, and BIO-2 must be implemented prior to any site disturbance in the SASG. Mitigation measures BIO-1a and BIO-1b address the removal of trees, should any trees be located within the SASG project area. Mitigation measure BIO-2 addresses the need to conduct nesting bird surveys. Then, because the Biological Resources Assessment for the DPEIR was conducted as a programmatic document and the specific boundary of the SASG project site is unknown, the Watermaster Party proposing the SASG recharge basin project is required to conduct a site-specific biological resources assessment prior to any site disturbance as set forth in mitigation measure BIO-3

Thompson Creek Spreading Grounds

The habitat at the TCSG project study area consists of alluvial habitat that has three alliances: *Eriogonum fasciculatum* Shrubland Alliance (California buckwheat scrub), *Malosma laurina* Shrubland Alliance (Laurel sumac scrub), and *Artemisia californica* Shrubland Alliance (California sagebrush scrub). In addition, several scalebroom (*Lepidospartum squamatum) plants as well as coast live oak trees (Quercus agrifolia)* were observed a dirt road at the far western boundary of the site. Portions of the project area have been used as a spreading ground for water recharge at the base of Thompson Creek Dam for decades. The entire project area is also bisected by dirt access

roads and the outlet channel for the dam. The project area proposed for expansion of the TCSG is located south of the dam and north of the Thompson Creek concrete-lined channel.

Critical Habitat

The site is not located within or adjacent any USFWS designated Critical Habitat. No further action is required.

Special Status Plant Species

In 2020, a Jericho Systems botanist conducted surveys on foot with 100 percent visual coverage of the approximately 25-acre TCSG project study area. Species for which the survey was conducted included Nevin's barberry, Plummer's mariposa-lily, Thread-leaved Brodiaea, and Slender-horned Spineflower. The SASG project study area contains suitable habitat for each of these species, but none of these species were observed during the field visits and are considered absent from the project area.

Sensitive Wildlife Species

In 2020, a Jericho Systems biologist also conducted surveys across the 25-acre project area. Based on the CNDDB search, the following species may be found within the project area: arroyo toad, foothill yellow-legged frog, southern mountain yellow-legged frog, coastal California gnatcatcher (CAGN), burrowing owl, Santa Ana sucker, and San Bernardino kangaroo rat. Arroyo toad, foothill yellow-legged frog, southern mountain yellow-legged frog, and Santa Ana sucker are all dependent on water flows. San Antonio Creek has been dammed and channelized in a concrete -lined channel. Therefore, there is no suitable habitat within the SASG recharge basin project area. The project study area does not support coastal sage scrub habitat, therefore CAGN would not be found within the SASG study area. Likewise, the site does not provide suitable habitat for the San Bernardino kangaroo rat or burrowing owl. In summary, no State and/or federally listed threatened or endangered species or other sensitive species were observed within the TCSG project study area during field surveys and due to existing conditions, such species are unlikely to occur within the TCSG project area. Although no protocol surveys were conducted for sensitive species, the lack of suitable habitat for these species they were presumed to be absent from the study area. However, because the start date for construction, and the specific site are unknown, prior to commencement of construction activities, the Watermaster Party proposing the SASG project shall have a Biological Resources Assessment completed per mitigation measure BIO-3.

Nesting Birds

The TCSG project study area and immediate surrounding areas contain habitat suitable for nesting birds. Therefore, prior to any site disturbance, a survey for nesting birds must be conducted, including clearing, and grubbing, during the nesting season to avoid potentially taking of any birds or active nests. In general, impacts to all bird species (common and special status) can be avoided by conducting work outside of the nesting season (generally March 15th to September 15th), and conducting worker awareness training. Mitigation measures BIO-1a, BIO1b, and BIO-2 must be implemented prior to any site disturbance in the TCSG. Mitigation measure BIO-1 addresses the removal of trees, should any trees be located within the TCSG project area. Mitigation measure BIO-2 addresses the need to conduct nesting bird surveys. Then, because the Biological Resources Assessment for the DPEIR was conducted as a programmatic document and the

specific boundary of the TCSG project site is unknown, the Watermaster Party proposing the TCSG recharge basin project is required to conduct a site-specific biological resources assessment prior to any site disturbance as set forth in mitigation measure BIO-3

Pedley Spreading Grounds

The approximately 20-acre PSG site is located adjacent to an elementary school and single-family neighborhood on the east, and single-family neighborhoods on the north and south. To the west is a more rural residential area and the Rancho Santa Ana Botanical Gardens. Under existing conditions, the site includes recharge basins, two reservoirs, a pump house, treatment facility and unpaved roads around the site. The proposed site is primarily developed but has a large pond on the northeast side. The proposed improvements at this site could impact avian use of pond and surrounding vegetation. It is recommended that a preconstruction or nesting bird clearance survey be conducted prior to the start of construction. This is set forth in mitigation measure BIO-2.

Fairplex Underground Infiltration Galleries

The proposed project is to utilize up to 10 acres at the LA County Fairplex to construct an underground filtration gallery to recharge stormwater and dry-weather runoff, and supplemental water into the Pomona Basin. The proposed site of the Fairplex recharge facilities is located in a fully developed area where no biological resources (plant or animal species) are likely to occur due to the current use of the site as soccer fields. Therefore, the proposed improvements at this site would not result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species on the project site.

Mitigation Measures

See Findings and Facts under Section E.2.3, Impact 4.4-1 mitigation measures BIO1a, BIO1b, BIO-2, regarding tree removal and nesting bird surveys.

BIO-3 *Additional Biological Resources Assessments*. Prior to the approval of future projects on sites not identified in this EIR and occurring within an undeveloped area, or sites within the SASG or TCSG where new recharge basins and related infrastructure are proposed, a biological assessment shall be made of the selected or potential sites to determine if sensitive biological resources (sensitive plant community, sensitive species, jurisdiction waters) are present. If a sensitive biological resource is present, an analysis will be made of the potential for impact to the resource, an appropriate mitigation strategy will be developed and submitted to the wildlife and regulatory agencies with authority to review and approve the mitigation strategy as reducing impacts to less than significant. Either appropriate avoidance and minimization measures will be developed to offset any potential impact or offsite mitigation shall be provided to offset the impact. At a minimum, the mitigation strategy shall (1) identify the affected SSC; (2) identify strategies for handling and relocation of individuals per CDFW guidance, and (3) identify compensatory mitigation for temporary or permanent loss of habitat that supports SSC (ratio to be determined in consultation with CDFW through an Incidental Take Permit.

Conclusions: TVMWD finds that with implementation of mitigation measures for tree removal or trimming (BIO-1a and BIO1b); to conduct nesting bird surveys prior to construction (BIO-2); and to complete site-specific biological resources assessments at each site prior to construction (BIO-3); TVMWD finds that implementation of these mitigation measures would result in Project Category 2 projects having a less than significant impact.

Impact 4.4-2 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; or 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?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: A general assessment of jurisdictional waters regulated by USACE, RWQCB – Los Angeles, RWQCB – Santa Ana River and CDFW was conducted for the proposed project area within the SASG and TCSG. This assessment was conducted as a desktop survey through the USGS National Hydrography Dataset for hydrological connectivity; supplemented by examining aerial imagery of the sites and comparing them with surrounding USGS 7.5-minute topographic quadrangle maps to identify drainage features within the project survey areas as indicated from topographic changes, blue-line features, or visible drainage patterns. The USFWS National Wetland Inventory and EPA Water Program "My Waters" data layers were also reviewed to determine whether any hydrologic features and wetland areas had been documented within the vicinity of the site. Similarly, soil maps from the U.S. Department of Agriculture (USDA) - Natural Resources Conservation Service (NRCS) Web Soil Survey were reviewed to identify the soil series on-site and to check if they have been identified regionally as hydric soils. Upstream and downstream connectivity of waterways (if present) was reviewed in the field, on aerial imagery, and topographic maps to determine jurisdictional status. No obvious signs of jurisdictional features were observed during the literature/aerial photograph review.

San Antonio Spreading Grounds

The SASG project area was surveyed with 100 percent visual coverage and no drainage features were present on site. The project biologist visiting the site concluded that fluvial processes have been substantially modified over the past 100 years. Fluvial processes have been modified by the San Antonio Dam, the channelization and lining (concrete) of San Antonio Creek, the development of recharge basins on both sides of the channel, below the dam, the development of aggregate mine pits, and the development of electrical transmission lines with towers. DPEIR Figure 2-5 shows the SASG and the various man-made features that have interrupted the fluvial process in that wash. The flow paths depicted on this figure represent how water flows when it is released from a turnout. Any water that flows in the channel and is turned out is controlled by the Army Corps of Engineers, and only when there is water behind the dam. Otherwise, there is no water to release. When there is water released the first priority is to divert it to the existing recharge basins below the dam.

However, because the timing of the construction of the new recharge basin in the SASG and the final location are unknown, implementation of mitigation measure BIO-4 may be required should the new facility result in impacts to jurisdictional wetlands. This measure requires consultation

with the regulatory agencies and may require permits under Sections 401 and 404 of the federal Clean Water Act, and Section 1602 of the California Fish and Game Code.

Thompson Creek Spreading Grounds

The project area was then surveyed with 100 percent visual coverage and no drainage features were present on site. Fluvial processes have been modified by the Thompson Creek Dam, the channelization and lining (concrete) of Thompson Creek, and the development of the Coyote pits.

However, because the final location of the TCSG recharge basin is unknown, implementation of mitigation measure BIO-4 may be required should the new facility result in impacts to jurisdictional wetlands. This measure requires consultation with the regulatory agencies and may require permits under Sections 401 and 404 of the federal Clean Water Act, and Section 1602 of the California Fish and Game Code.

Pedley Spreading Grounds

A general assessment of jurisdictional waters was not completed for the Pedley Spreading Grounds (PSG) site, nor was a field survey completed at the site. The PSG site consists of small basins that are fed by a pipeline that conveys water from below the San Antonio Dam through the pipeline and into the basins located in a residential neighborhood in the City of Claremont. There are no natural drainage features that provide water to the PSG and there is no outlet from the PSG site into any drainage feature such as a creek or flood control channel. Expansion of the PSG consists of widening and deepening the existing basins and providing additional water from the local storm drain system through a new pipeline. No outlet from the PSG site is envisioned for this project, therefore, there is no impact on jurisdictional waters or wetlands associated with the PSG project.

In addition, upgrading the PSG site to accommodate local urban runoff would create a new diversion of drainage captured from the surrounding urban area. The area is currently served by an existing storm drain system, and any stormwater collected with this drainage would be diverted away from its current direction of flow and into the PSG recharge basins. Therefore, mitigation measure BIO-3 shall be implemented prior to construction. This requires the Watermaster Party undertaking this project to conduct a biological resources assessment to determine if the proposed project would adversely affect biological resources, including downstream riparian habitat. Implementation of this measure would not occur until such time as this project is in the design stage where enough information about the project is known and a CEQA Initial Study can be prepared. In addition, if the assessment determines that the project would impact a jurisdictional water (Waters of the State or US), then implementation of mitigation measure BIO-4 to consult with regulatory agencies is also required. See below for revised text.

Fairplex Recharge Facilities

A general assessment of jurisdictional waters was not completed for the Fairplex site, nor was a field survey completed at the site. The proposed site of the new underground infiltration gallery would be constructed in an area that is transitioning from horse stables and tracks to soccer fields. The intent of this project is to provide additional groundwater recharge in the Pomona Basin utilizing stormwater runoff, recycled water, imported water, or a combination. This may

include diverting stormwater and dry-weather runoff from the concrete-lined Thompson Creek channel; or piping untreated imported water from the Rialto Feeder into the Thompson Creek channel and divert it to the new recharge basins. Although the Thompson Creek channel in the vicinity of the LA Fairplex is concrete lined, it is tributary to the San Gabriel River and at the confluence between the creek and the river, the river is unlined and exhibits riparian features. Therefore, mitigation measure BIO-4, has been identified to ensure that should construction or operations activities associated with the Fairplex recharge facilities, regarding conveyance of water from Thompson Creek, would be less than significant.

However, the intent of the proposed Fairplex project is to capture, treat and discharge stormwater into an underground infiltration system rather than having that stormwater enter the Thompson Creek channel. The project is still conceptual however, it would likely include a catch basin that captures stormflows that have been redirected from local streets or the Thompson Creek channel and conveys them into a hydrodynamic separator for pretreatment before being conveyed into the infiltration gallery. It is intended that any overflow from the infiltration gallery will discharge back into Thompson Creek. The Thompson Creek channel in the vicinity of the LA Fairplex is concrete lined, it is tributary to the San Gabriel River and at the confluence between the creek and the river, the river is unlined and exhibits riparian features. Therefore, mitigation measure BIO-4, has been identified to ensure that should construction or operation activities associated with the Fairplex recharge facilities, regarding conveyance of water from Thompson Creek, would be less than significant.

Mitigation Measures

BIO-4 *Wetland Permits or Streambed Alteration Agreement*. Prior to approval of a project where permanent impacts in areas determined to be potential jurisdictional wetlands or riparian features, Waters of the State or Waters of the U.S., the Watermaster Party undertaking a project shall consult with the regulatory agencies (USACE, RWQCB and CDFW) to determine if a CWA 404 permit, CWA 401 or a Streambed Alternation Agreement under Fish and Game Code 1602 are required prior to development. Based on a notification pursuant to Fish and Game Code section 1602 and other information, CDFW will determine whether a Lake and Streambed Alteration (LSA) Agreement is required prior to conducting proposed activities. An LSA Notification shall include the following: 1) an analysis to demonstrate that concrete-lined or soft-bottom channels would not be impaired (e.g., aggraded, incised, increased suspended sediment), 2) a hydrological evaluation of the 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions, 3) whether dewatering/diversion of water may be necessary, and (if applicable) 4), an analysis of whether diversion structures would impact stormwater and dry season water flow, and the extent of those impacts, during the wet season (November through March), dry season (April through October), and both above-average and below-average water year.

The following shall be incorporated into the permitting subject to approval by the regulatory agencies:

a) On- or offsite replacement of USACE/RWQCB jurisdictional waters of the U.S./waters of the State at a ratio no less than 1:1 for permanent impacts and to restore the site to pre-project conditions for temporary impacts. Offsite

replacement may include the purchase of mitigation credits at an agency-approved offsite mitigation bank or in-lieu fee program.

b) On- or offsite replacement of CDFW jurisdictional streambed and associated riparian habitat at a ratio no less than 2:1 for permanent impacts and to restore the site to pre-project conditions for temporary impacts. Offsite replacement may include the purchase of mitigation credits at an agency-approved offsite mitigation bank or in-lieu fee program.

Conclusions: TVMWD finds that with implementation of mitigation measure BIO-4 requiring consultation with regulatory agencies and compliance with the requirements of permits or agreements that would be issued by these agencies, impacts associated with the development of Project Category 2 projects would be less than significant.

Impact 4.2-3 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?

Findings: Less Than Significant with Mitigation Incorporated

Facts: New recharge basins in the undisturbed habitat at SASG and TCSG could have minor impacts on local migration routes along the foothills of the San Gabriel Mountains. At both sites, there would still be sufficient surrounding undeveloped habitat to allow local migration to continue between and valley floor, San Gabriel foothill and the upper reaches of the mountains. Therefore, during the design phase for the new SASG and TCSG recharge basins, mitigation measure BIO-3 shall be implemented. The Biological Resources Assessment shall identify areas where wildlife migratory corridors or nursery sites may occur relative to the proposed recharge basin sites. It is during the design phase that the ultimate location of the new recharge basins would be determined. Therefore, implementation of mitigation measure BIO-3 would assist project designers with the final site selection to ensure that impacts associated with the potential to interfere with wildlife movement or impede the use of a native wildlife nursery site would be less than significant.

Pedley Spreading Grounds

Impacts associated with the proposed improvements consisting of deepen existing recharge basins six feet to 10 feet; and constructing a pipeline interconnect between existing storm drains in the local neighborhood to the recharge basins may have very limited and temporary impacts that would be considered less than significant.

Fairplex Recharge Facilities

The site of the proposed underground galleries to be used for recharge is located in a developed area of the Fairplex that is currently developed with soccer fields. The site was formerly part of the facility's horse racing venue. Therefore, this project would not adversely impact native resident or migratory species and/or local migration routes?

Mitigation Measures

See Findings and Facts under Section F.2.3, Impact 4.4-1 mitigation measure BIO-3.

Conclusions: TVMWD finds that with implementation of mitigation measure BIO-3 for Project Category 2 projects at the SASG and TCSG project sites to determine presence/absence of wildlife species that may use the areas and recommend measures to implement to ensure that impacts would be less than significant.

Impact 4.4-4 Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Impacts associated with the construction and operation of new Project Category 2 facilities may require vegetation removal, including mature trees at the SASG, TCSG and PSG. There is no vegetation of note at the Fairplex project site as this area is part of the former horse racing area of the grounds.

Mitigation Measures

See Findings and Facts under Section E.2.3, Impact 4.4-1 BIO-1a, BIO-1b and BIO-2.

Conclusions: TVMWD finds that construction of new Project Category 2 facilities may require vegetation removal including trimming the existing trees or shrubs, but that implementation of mitigation measures BIO-1 and BIO-2 would ensure that potential impacts on nesting birds would be less than significant.

F.2.4 Cultural Resources/Tribal Cultural Resources

Impact 4.5-1 Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5, Determining the Significance to Archaeological and Historical Resources?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: With the exception of the Fairplex site, the areas where new Project Category 2 facilities will be created are undeveloped. The proposed areas where the SASG and TCSG recharge basins would be developed are located in washes largely covered by vegetation. Nevertheless, there is a potential destruction of unknown prehistoric and historical archaeological resources during site disturbance. Although the potential to recover of unknown resources at these project sites is low due, the possibility exists that excavation or trenching activities may uncover such resources. Therefore, mitigation measure CUL-1 requires each of the Watermaster Parties to hire a qualified archeologist to conduct a cultural resources assessment of the sites while CUL-2 requires the archaeologist to review site/construction plans, conduct a site visit, and determine whether monitoring would be required.

The potential to disturb Native American human remains may occur where excavation or trenching activities are proposed. However, should construction activity result in the disturbance of human remains, mitigation measure CUL-3 would be implemented. This requires that the construction contractor stop work in the area and contact the Coroner.

Because these projects require excavation and trenching, Watermaster Parties proposing Project Category 2 projects would be required to implement mitigation measures CUL-1 through CUL-3 during development of Project Category 2 facilities.

Mitigation Measures

See Findings and Facts under Section E.2.4, Impact 4.5-1 mitigation measures CUL-1 through CUL-3.

Conclusions: TVMWD finds that implementation of mitigation measures CUL-1 through CUL-3 can reduce potential impacts to historical and archaeological resources pursuant to Section 15064.5, or unknown subsurface historical resources to a less than significant impact level for projects. Further, TVMWD finds that with implementation of mitigation measure CUL-3 should human remains be uncovered would reduce that impact to a less than significant level. Mitigation measures CUL-1 through CUL-3 will be integrated into the future development activities without additional impacts on the environment.

Impact 4.5-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: See Facts under Impact 4.5-1 above.

Mitigation Measures

See Findings and Facts under Section E.2.4, Impact 4.5-1 mitigation measures CUL-1 through CUL-3.

Conclusions: TVMWD finds that implementation of the mitigation measures CUL-1 and CUL-2 can reduce potential impacts to archaeological resources pursuant to Section 15064.5, or unknown subsurface archaeological resources to a less than significant impact level for Project Category 2 projects. The above measures can be implemented without causing additional adverse environmental impacts. Mitigation measures CUL-1 and CUL-2 will be integrated into the future development activities without additional impacts on the environment.

Impact 4.5-3 Disturb any human remains, including those interred outside of formal cemeteries?

Findings: Less Than Significant with Mitigation Incorporated

Facts: See Facts under Impact 4.5-1 above.

Mitigation Measures

See Findings and Facts under Section E.2.4, Impact 4.5-1 for mitigation measures CUL-3.

Conclusions: TVMWD finds that implementation of mitigation measure CUL-3 would reduce potential impacts to unknown human remains to a less than significant impact level. The Watermaster Party proposing a Project Category 2 project shall comply with provisions of state law regarding discovery of human remains, including PRC Section 5097.98 and Health and Safety

Code Section 7050.5. Mitigation measure CUL-3 shall be integrated into the future development activities for Project Category 2 facilities projects without additional impacts on the environment.

Impact 4.5-4 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).

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: There are no Project Category 2 facilities project sites that are listed or eligible for listing on the California Register of Historical Resources, or in a local register of historical resources. However, some of these sites contain facilities that may be over 45 years old, and thus may be eligible to be listed as historic resources. Therefore, to ensure that proposed projects on existing sites comply with the requirement to consider projects that may affect facilities over 45 years in age, mitigation measure CUL-1 shall be implemented. If potentially significant resources are encountered during the survey, mitigation measure CUL-2 shall be implemented.

Mitigation Measures

See Findings and Facts under Section E.2.4, Impact 4.5-1 mitigation measures CUL-1 and CUL-2.

Conclusions: TVMWD finds that implementation of mitigation measures CUL-1 and CUL-2 can reduce potential impacts to historical resources, or unknown subsurface historical resources to a less than significant impact level for Project Category 2 projects. These measures can be implemented without causing additional adverse environmental impacts. Mitigation measures CUL-1 and CUL-2 will be integrated into the future development activities without additional impacts on the environment.

Impact 4.4-5 A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: TVMWD completed the requirements for tribal consultation pursuant to Assembly Bill 52 (AB 52) in 2020. Because the DPEIR prepared for the Strategic Plan was programmatic, individual project sites were not assessed for potential site-specific impacts. Therefore, at such time as TVMWD or other Watermaster Party proposes a project, a site-specific Cultural Resources Assessment shall be prepared consisting of a literature search and site survey. In addition, the Watermaster Party or designated project archaeologist for a project shall contact the Native American Heritage Commission (NAHC) who will provide a list of Native American tribes that should be contacted for AB 52 consultation. Individual tribal representatives will determine whether a project warrants consultation.

Mitigation measure CUL-4 shall be implemented prior to approval of a project per the requirements of Public Resources Code Section 21084.3. The intent is to minimize adverse impacts to tribal cultural resources to the satisfaction of the lead agency and the Native American tribe that requested consultation under AB 52.

Mitigation Measures

See Findings and Facts under Section E.2.4, Impact 4.5-5 for mitigation measure CUL-4.

Conclusions: TVMWD finds that construction activities may have the potential to affect significant historic-period archaeological resources, tribal cultural resources, and/or human remains; and thus, construction impacts on historical, archaeological, and tribal cultural resources, as well as human remains, could be significant. However, implementation of mitigation measure CUL-1 through CUL-4 would ensure that impacts associated with these impacts would be less than significant during construction.

F.2.5 Environmental Justice

Impact 4.6-1 Result in a disproportionate human health or significant environmental impact on minority and/or low-income populations?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: The Environmental Justice section of the DPEIR focused on a number of environmental issues.

Air Quality/Greenhouse Gas Emissions/Global Climate Change

The Air Quality Impact Analysis for the Strategic Plan evaluated a range of projects that could be developed over a 13-month construction period, including the development of the new recharge basin at the SASG. The SASG project was selected because it represents the largest of the Project Category 2 projects. The Air Quality analysis showed that after implementation of mitigation measures AQ-1 through AQ-3 during construction activities, SCAQMD's LSTs would not be exceeded. Then during operation, emissions would be negligible, associated with site inspections and periodic maintenance.

Hazards/Hazardous Materials/Wildfire Hazards

<u>Hazards/Hazardous Materials</u>

During construction there is a potential for hazardous materials, substances, or waste to be routinely transported, used, or stored at a site, although because Project Category 2 projects are generally simply excavated earthen areas with little or no infrastructure associated with their operation, impacts associated with the routine transportation, use, storage, and disposal of hazardous materials would be less than significant and would not disproportionately affect existing minority or low-income communities in the Six Basins project area during short-term construction or long-term operation.

<u>Wildfires</u>

Two Project Category 2 projects – new recharge basins at SASG and TCSG sites would be located in a Fire Hazard Severity Zone. However, the SASG and TCSG are not located within census tracts where disadvantaged communities are located.

Hydrology/Water Quality

The location of existing sites for Project Category 2 projects do not coincide with any of the census tracts representing minority or low-income populations. Therefore, there would be no impact associated with these projects. The proposed underground infiltration gallery proposed at the LA County Fairplex site would be developed beneath proposed soccer fields on the site of the former horse racing track. Therefore, like other Project Category 2, projects there would be no Hydrology/Water Quality impacts associated with this project.

Transportation

Impacts associated with the development of Project Category 2 projects on the local street network would be short-term impacts such as road detours or lane closures associated with equipment and material deliveries. Therefore, mitigation measures TR-1 through TR-3 have been identified to ensure that impacts can be minimized in the short term. No transportation/traffic impacts associated with the operation/maintenance of Project Category 2 projects as these activities would be intermittent and be limited to one or two vehicles on site.

During operations minimal transportation/traffic impacts associated with the operation/maintenance of recharge basins are anticipated. On a daily basis, site inspections involving access for a light duty vehicle would occur. However, at times recharge basins require maintenance which may involve the use of vehicles and equipment similar to those used during construction. At that time, mitigation measures TR-1 through TR-3 would apply to this type of activity. Implementation of these measures would ensure that such activities would not disproportionately affect existing minority or low-income communities in the Six Basins project area during short-term construction or long-term operation.

Mitigation Measures

See Findings and Facts under Section E.2.2, Impact 4.3-1 mitigation measures AQ-1 though AQ-3, and under Section E.2.11, Impact 4.14-1 mitigation measures TR-1 through TR-3.

Conclusions: TVMWD finds that implementation of Project Category 2 projects would not disproportionately affect existing minority or low-income communities with implementation of mitigation measures for Air Quality, Hazardous Materials, Wildfires, or Transportation as all impacts can be reduced to less than significant levels.

F.2.6 Geology/Soils/Paleontological Resources/Mineral Resources

Impact 4.7-1 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, ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; or (iv) landslides?

Findings: Less than Significant Impact with Mitigation Incorporated

Facts: These projects would occur in four locations: 1) SASG; 2) TCSG; PSG; and 4) the LA County Fairplex site.

Fault Rupture and Strong Seismic Ground Shaking

There are no habitable structures associated with Project Category 2 projects. These projects would be designed based on geotechnical studies that determine how the sites should be developed to withstand strong seismic ground shaking to prevent damage to the basins. For the SASG recharge basin, the proposed operator – Holliday Rock – will prepare a plan of operation and a reclamation plan per SMARA, that shows how the site would be stabilized during excavation (maximum slopes ratios) and how the site would be reclaimed. Therefore, this impact would be less than significant with the implementation of mitigation measures GEO-1 and GEO-2.

Seismic-related Ground Failure Including Liquefaction

There are no habitable structures associated with Project Category 2 projects. Instead, the impact would be related to the potential for berms surrounding recharge basins to slump or breach, causing water to be released, if basins are full. However, both the new TCSG and SASG recharge basins are located in areas adjacent to vacant land so it is likely that water released would spread in their respective washes rather than flooding urban areas. Regarding the PSG site, this site is relatively flat and is located on a large uninhabited site so that the potential for a breached berm to cause significant flooding in the surrounding urban area would be less than significant. Finally, regarding the underground infiltration gallery at the LA Fairplex site, seismic-related ground failure of the underground gallery may result in flooding, however, the site of the new gallery is located within the larger Fairplex site so that flooding would not significantly affect any habitable structures. Recharge basins would be designed based on geotechnical studies, and for the SASG recharge basin, in accordance with SMARA requirements, that determine how the sites should be developed to withstand strong seismic ground shaking to prevent damage to the basins. Therefore, this impact would be less than significant with mitigation incorporated. See mitigation measures GEO-1 and GEO-2.

Landslides

Stormwater and Supplemental Water Recharge projects would not be developed in areas susceptible to landslides. Because the recharge basins berms (sidewalls) would be earthen, there is a potential for slumping to occur during a seismic event. However, this would likely occur in the interior of the basins so that the likelihood that recharge water could be released downstream is minimal. Regardless, all new recharge basins shall be designed in accordance with mitigation measures GEO-1 and GEO-2 resulting in a less than significant impact.

Mitigation Measures

See Findings and Facts under Section E.2.6, Impact 4.7-1 mitigation measures GEO-1 and GEO-2.

Conclusions: TVMWD finds that with implementation of mitigation measures GEO-1 requiring the preparation of a site-specific geotechnical investigation and GEO-2 requiring compliance with CBC requirements and implementation of project-specific engineering design and construction measures, would avoid the potential for adverse impacts associated with strong seismic ground shaking. TVMWD further finds that the potential for liquefaction to adversely affect groundwater well and treatment facilities can be minimized through the management of groundwater levels in areas of known high groundwater levels.

Impact 4.7-2 Result in substantial soil erosion or the loss of topsoil?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Construction activities for proposed Project Category 2 projects such as excavation and grading may result in soil erosion during rain or high wind events. Such construction activities must comply with SCAQMD Rule 403 for dust control that would ensure the prevention and/or management of wind erosion and subsequent topsoil loss. To prevent erosion associated with stormwater runoff from construction sites during initial grading activities the Watermaster Party proposing a project, or the construction contractor must prepare and implement a SWPPP identifies BMPs to control erosion, sedimentation, and hazardous materials potentially released from construction sites into surface waters.

During operation of Project Category 2 projects, because they are below grade, soil erosion would be minimal as the sites would drain internally. For the Fairplex project where the facility would be underground, there would be no soil erosion.

Mitigation Measures

See Findings and Facts under Section E.2.2, Impact 4.3-1 mitigation measures AQ-1 through AQ-3 and Section E.2.8, Impact 4.9-2 for mitigation measure HWQ-2.

Conclusions: TVMWD finds that with implementation of mitigation measure AQ-1 for the control of fugitive dust during construction, and with implementation mitigation measure HWQ-2 for a project-specific SWPPP during construction, the potential for substantial soil erosion or the loss of topsoil to occur during construction or operation of facilities at Project Category 2 project sites would be less than significant.

Impact 4.7-3 Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Development of new recharge basins or enlarging existing basins would not cause subsidence, settlement, or lateral spreading at the site or at downstream properties. Failure of basins slopes may occur during a seismic event however because the result would be for the material making up the slope to likely slide into the basin. For the PSG site, slope failure would not affect surrounding residences because the basins are located in the interior of the site and not adjacent to residential properties. For the SASG and TCSG, there are no surrounding properties that would be adversely affected should a basin side slope fail. For the SASG, if slope failure occurs, any water in the basin would either remain in place (ultimate depth of 200 feet bgs). For the TCSG, should that basin experience slope failure such that water is released, it would likely flow southwesterly into the Thompson Creek channel. There is no issue at the Fairplex site because this facility would be an underground. However, mitigation measure GEO-2 would still apply to projects that may be undertaken in areas susceptible to non-seismically induced geologic hazards. With implementation of GEO-2, this impact can be reduced to a less than significant level.

Mitigation Measures

See Findings and Facts under Section E.2.6, Impact 4.7-1 mitigation measure GEO-2.

Conclusions: TVMWD finds that with implementation of mitigation measure GEO-2 requiring the preparation of a design-level geotechnical investigation to identify potential geologic hazards including unstable soils that may be located on at a Project Category 2 project site. Further, TVMWD finds that recommendations from the geotechnical investigation for site-specific design criteria to mitigate for seismic and non-seismic hazards, would ensure that this impact would be less than significant.

Impact 4.7-4 Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: The soils in the Six Basins project area are predominantly alluvial material within the valley area on top of bedrock. Predominant soils in the Six Basins project area are classified as Urban Land, defined as discontinuous human-transported material over alluvium derived from granite and/or sedimentary rock, ranging from 0 to 9 percent slope. Underlying soils are well drained to excessively drained sands, loams, and gravelly sands typical of alluvial material, down to bedrock. In the SASG, where the mine pits are located, sediments are a combination of sands, loams, gravels and larger cobbles and boulders.

There are some locations within the project area that contain clay loams to sandy clay loams that have the highest shrink/swell potential. Typical construction techniques to address expansive soils if they are encountered on a project site is to remove the material and replace with a more suitable soil; or over excavate and recompact in place. The particular technique would be identified in a project's geotechnical investigation as identified in mitigation measure GEO-2. Therefore, if expansive soils are encountered on a project site, they can be mitigated to a less than significant level with implementation of mitigation measure GEO-2.

Mitigation Measures

See Findings and Facts under Section E.2.6, Impact 4.7-1 mitigation measure GEO-2.

Conclusions: TVMWD finds that with implementation of mitigation measure GEO-2 requiring the preparation of a design-level geotechnical investigation to identify potential geologic hazards including expansive soils that may be located on a project site. The geotechnical investigation shall recommend site-specific design criteria to mitigate for seismic and non-seismic hazards, such as special foundations and structural setbacks, and these recommendations shall be incorporated into the design of individual projects. Therefore, with mitigation, this impact would be less than significant.

<u>Paleontological Resources</u>

Impact 4.7-6 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Because the EIR evaluates the Strategic Plan and related projects at a programmatic level, specific project design elements have not been finalized. However, as project construction is undertaken, excavation at some sites may be required, including Project Category 2 projects. Therefore, mitigation measure GEO-3 was identified and will apply to all projects that require excavation at depths greater than three feet, a qualified paleontologist must be retained to determine if a study of the project area for paleontological resources should be undertaken. If the paleontologist determines this to be the case, he/she will conduct a paleontological resources assessment designed to identify potentially significant resources. The assessment would consist of: (1) a paleontological resource records search to be conducted at the Los Angeles County Natural History Museum and/or other appropriate facilities; (2) a field survey or monitoring during excavation (or both) if deemed appropriate by the paleontologist; and (3) recordation of all identified paleontological resources.

Mitigation Measures

See Findings and Facts under Section E.2.6, Impact 4.7-6 mitigation measure GEO-3.

Conclusions: TVMWD finds that excavation at project sites to depths of three feet or greater may reveal unknown paleontological resources. Where a project requires excavation, mitigation measure GEO-3 shall be implemented which requires that a qualified paleontologist shall be retained to determine if on-site monitoring is required, and if resources are recovered during monitoring, that they be recorded. TVMWD finds that the potential impacts to unknown paleontological resources would be less than significant.

F.2.7 Hazards and Hazardous Materials/Airport Safety/Wildfire Hazards

Hazardous Materials

Impact 4.8-1 Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; or 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

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts:

Construction

Project Category 2 projects do not include the development or operation of production wells or treatment facilities. Construction activities would require the transport, use, and disposal of hazardous materials including gasoline, diesel fuel, hydraulic fluids, and other similarly related materials, generally in support of heavy equipment (e.g., dozer, excavator, backhoe, water truck) operation. Construction includes grading, excavation, and trenching to create water recharge basins and related infrastructure. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction projects, and there would be no greater risk for improper handling, transportation, or spills associated with any of Project Category 2 projects than would occur on any other similar construction site. Where mandatory

compliance with applicable hazardous materials regulations is assumed, construction of new or expansion of existing basins for groundwater recharge would not create significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials or waste during the construction phase. Therefore, a less than significant impact on the environment would occur.

All Project Category 2 projects would result in the disturbance of more than one acre of a site. Therefore, the Watermaster Party proposing a project would be subject to the same federal and State regulations regarding the development and implementation of a SWPPP. With implementation of BMPs as set forth in a project specific SWPPP, development of recharge basins would not result in significant impacts related to pollutant runoff from a site during construction. Mitigation measure HWQ-2 sets forth the requirement to implement BMPs during project construction.

For the new recharge basin in the SASG, development of the basin will require a Local Mining Permit (generally a Conditional Use Permit) from the City of Claremont, an approved Reclamation Plan, and a Financial Assurance statement for the excavation of the approximately 50-acre site to a depth of up to 200 feet below grade. As part of the CUP application and draft Reclamation Plan, Holliday Rock (the proposed operator for the mining portion of the project), will be required to implement a drainage plan and a SWPPP on-going through the proposed five-year excavation period.

Operation

Operation of the new or expanded rechange basins at the SASG, TCSG, and PSG, would generally consist of monitoring the facilities and conducting routine maintenance. Maintenance would consist of vegetation removal, inspection and repair of sidewalls and periodically grading the bottom of basins to remove built up silts and debris to ensure maximum percolation. As such, operation activities at these sites would be similar to construction activities. With regard to the Los Angeles County Fairplex site, a new underground infiltration gallery is proposed to be developed beneath a series of soccer fields. Therefore, on-going maintenance would not include site disturbing activities such as vegetation removal or desilting (grading).

Therefore, Project Category 2 projects would not pose a significant hazard to the public or the environment through the routine transport, use, storage, emission, or disposal of hazardous materials, nor would a project increase the potential for accident conditions which could result in the release of hazardous materials into the environment. This is because, under normal conditions, no human site disturbing activities would occur; and periodic maintenance would be subject to similar requirements as under construction activities and require the implementation of mitigation measure HWQ-2 regarding control of stormwater runoff during construction. Based on this information, potential impacts associated with the construction and operation of Project Category 2 projects would be less than significant with implementation of BMPs as set forth in a project specific SWPPP (mitigation measure HWQ-2).

Vector Control

Not related to hazardous materials, but may be considered a public health issue, are that proposed new recharge basins, or the expansion of existing recharge basins would create new standing pools of water that may attract insects. If insects such as midges or mosquitoes use the water as

a breeding area, standing pools of water could be considered a nuisance or a health threat to the surrounding community. When midges hatch, they can emerge in huge numbers, resulting in swarms of midges that can create nuisance problems. Unlike mosquitoes, midges do not bite or sting and do not carry infectious diseases, they are just a nuisance (https://www.wvmvcd.org/) In the Six Basins project area there are two vector control agencies: (1) West Valley Mosquito and Vector Control District that covers the San Bernardino side of the project area (Upland and San Antonio Heights); and (2) San Gabriel Valley Mosquito and Vector Control District covering the San Gabriel Valley (Claremont, La Verne and Pomona). Both districts have had reports of mosquitoes carrying West Nile virus. Watermaster Parties that operate spreading grounds where these recharges basins are located, work with the vector control districts to prevent nuisances or health hazards or control them once identified. Mitigation measure HAZ-2 requires that Watermaster Parties proposing new recharge basins or expanding existing recharge basins prepare and implement a vector control plan that would be reviewed and approved by one of the two Vector Control Districts. Implementation of mitigation measure HAZ-2 will ensure that impacts associated with mosquitoes, midges or other vectors would be less than significant.

Mitigation Measures

HAZ-2 Prior to the initial use of new or expanded recharge basins within spreading grounds, Watermaster Parties proposing new recharge basins or expansion of existing recharge basins in spreading grounds shall coordinate with the local vector control agencies (West Valley MVCD or SGVMVCD) to develop a strategy/plan to minimizes occurrence of vectors, such as midges and mosquitos; and to establish protocols for monitoring and eradicating vectors should they be found when basins are in use (filled with water). Monitoring to determine presence/absence of vectors during periods when recharge basins are holding water shall be the responsibility of the individual Watermaster Party to engage the services of a vector control professional. Should monitoring have positive results, the vector control professional shall work with the Vector Control District to implement control measures as set forth in the approved strategy/plan. The strategy/plan shall be prepared and available to be implemented prior to initiating the use of a new recharge basins or expansion area of an existing recharge basins.

Conclusions: TVMWD finds that the construction and operation of Project Category 2 projects would not pose a significant hazard to the public or the environment through the routine transport, use, storage, emission, or disposal of hazardous materials, nor would a project increase the potential for accident conditions which could result in the release of hazardous materials into the environment with implementation of BMPs as set forth in a project-specific SWPPP (HWQ-2). Further TVMWD finds that with implementation of mitigation measure HAZ-2 for vector control will ensure that impacts associated with mosquitoes, midges or other vectors would be less than significant.

Wildfire

Impact 4.8-7 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 wildfire? (Threshold 8)

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts:

Construction

There are no occupants (residents or employees) associated with the proposed projects in this category. However, both the SASG and TCSG project areas are located within a designated High Fire Severity Zone where vegetated areas around active recharge basins may represent fuel for wildfires. Therefore, mitigation measures HAZ-5 shall be implemented prior to initiation of construction activities at the SASG and TCSG. Implementation of a Fire Management Plan as set forth in mitigation measure HAZ-5 during construction will ensure that this impact is less than significant.

The PSG site is not located within a designated High Fire Severity Zone where wildfire risk is greatest, due to a combination of steep topography, dry vegetation (fuel) and wind factors (e.g., Santa Ana wind conditions). However, the project site and adjacent open space associated with the Botanical Gardens have the potential to burn under ideal fire conditions (dry vegetation, high wind conditions, source of ignition). This is a potentially significant impact. Therefore, mitigation measures HAZ-5 and HAZ-6 shall be implemented prior to initiation of construction or maintenance activities at the PSG site. Implementation of a Fire Management Plan will ensure that this impact is less than significant.

The proposed underground infiltration gallery to be developed at the Fairplex is located in a developed area near the center of the site. Therefore, there is no risk of wildfire associated with the Fairplex project.

Operation

Operation of spreading grounds is a relatively passive activity where a water supply (stormwater, supplemental water, recycled water) fills the basins and is allowed to percolate. Intermittently, maintenance must be performed to keep the basins free of vegetation and to remove silt built up on basin floors. For general operation of the spreading grounds, no mitigation is required. However, when maintenance is being performed using equipment to clear brush and remove silt, implementation of a Fire Management Plan as described in mitigation measure HAZ-6, will ensure that this impact is less than significant.

Mitigation Measures

HAZ-5 During construction of facilities (new production wells, pipeline interconnects and related facilities) located in areas designated as Fire Hazard Severity Zones by CAL FIRE, fire hazard reduction measures shall be implemented and incorporated into a fire management plan. These measures shall address all staging areas, welding areas, or areas slated for development that are planned to use spark-producing equipment. These areas shall be cleared of dried vegetation or other material that could ignite. Any construction equipment that includes a spark arrestor shall be equipped with a spark arrestor in good working order. During the construction of the project facilities, all vehicles and crews working at the project site to have access to functional fire extinguishers at all times. In addition, construction crews shall have a spotter during welding activities to look out for potentially dangerous situations, including accidental sparks.

HAZ-6 Then, during long term operation of facilities located in Fire Hazard Severity Zones, the Watermaster Party conducting operations/maintenance activities of such activities (spreading ground desilting and vegetation removal, maintenance of well sites, etc.) shall ensure that a fire management plan shall be included in the maintenance plans for each facility.

Conclusions: TVMWD finds that with implementation of mitigation measures HAZ-5 and HAZ-6, impacts associated with wildfires at Project Category 2 project sites can be reduced to less than significant levels.

F.2.8 Hydrology/Water Quality

Impact 4.9-2 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 onsite or offsite; ii). substantially increase the rate or amount of surface water runoff in a manner which would result in flooding on or offsite; iii) create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv) impede or redirect flood flows?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts:

Construction - SASG and TCSG Projects

The purpose of these two Project Category 2 projects is to create additional groundwater recharge capacity in new recharge basins in order to receive an increased amount of stormwater, supplemental water, and at the new SASG site, to receive recycled water from the Pomona WRP to recharge the groundwater basin. The intent is to capture and detain a maximum amount of water on each site in order to recharge the groundwater basin, so that no stormwater runoff is anticipated. Therefore, the new recharge basin projects would result in a decrease in the amount of surface water runoff in the SASG and TCSG and would not create runoff water that would exceed the capacity of a storm drain system. These projects have the ability to impede and redirect flood flows into new groundwater recharge basins for the beneficial use of the Watermaster Parties.

Regarding the potential to cause substantial erosion or siltation on or offsite, during construction, mitigation measure HWQ-2 shall be implemented at the SASG and TCSG sites during construction activities. This measure requires that prior to the commencement of construction, a Watermaster Party or its construction contractor shall prepare a SWPPP to be implemented throughout the schedule of construction activities.

Construction - PSG Project

The proposed PSG project is to deepen the existing recharge basins to accommodate local urban runoff from the surrounding neighborhood, in addition to the stormwater conveyed from the SASG. The intent of this project is to receive and detain this water on site in order to increase the amount of recharge into the UCHB, so that no stormwater runoff is anticipated. Impacts

associated with construction activities would be similar to those identified for the SASG and TCSG projects. Because the PSG project represents over one acre of disturbance, the City of Pomona or its construction contractor would be required to prepare and implement a SWPPP. Mitigation measure HWQ-2 shall be implemented at the PSG site during construction activities.

Construction - LA County Fairplex Project

Impacts associated with construction activities would be similar to those identified for the SASG and TCSG projects but would have a smaller footprint (up to 10 acres). Because the Fairplex project represents over one acre of disturbance, the Watermaster Party proposing a project, or its construction contractor would be required to prepare and implement a SWPPP. Mitigation measure HWQ-2 shall be implemented at the Fairplex site during construction activities.

Long-term Operation

Operation of Project Category 2 projects is largely passive where stormwater flows by gravity downstream (either from rainfall, released from behind the dam, or conveyed through a pipeline or storm drain) into recharge basins or an underground infiltration gallery. Maintenance activities at the SASG, TCSG and PSG sites would consist of periodic vegetation removal and the removal of silt and debris that accumulates on the floor of basins over time. Equipment and vehicles used for these activities would be similar to those used during construction activities. Therefore, impacts associated with the operation/ maintenance of recharge basins would be similar to construction impacts. Under long term operation, the Watermaster Party or its construction contractor would be required to implement BMPs similar to those identified in construction SWPPPs. Therefore, implementation of mitigation measure HWQ-2 would ensure that impacts associated with operation and maintenance activities are the SASG, TCSG and PSG would be less than significant.

Regarding the underground infiltration gallery at the LA County Fairplex site, because the proposed infiltration gallery is underground, operation and maintenance would not involve the use of heavy construction equipment to remove vegetation or debris as with the other recharge basins. Therefore, this impact would be less than significant.

Regarding a Project Category 2 project resulting in an impediment to or the redirection of flood flows during operation, flood flows in the SASG and TCSG are currently held behind dams and released into existing recharge basins or pits, or released into existing concrete-lined storm channels. Under future operating conditions, the additional capacity in new recharge basins in both spreading grounds sites would allow Watermaster Parties to increase the amount of stormwater that can be detained on site for percolation, with any overflow continuing to be released into the existing storm channel as under existing conditions. Therefore, flood flows would be impeded and directed into the new recharge basins at the SASG and TCSG for beneficial use, resulting in a less than significant impact on the potential for flooding to occur.

Regarding the PSG project, flows from the SASG would continue to flow through the existing pipeline to the PSG with additional stormwater flows into the PSG from a new storm drain. The expansion/deepening of the PSG basins will be designed to accommodate these additional flows.

Mitigation Measures

See Findings and Facts under Section E.2.8, Impact 4.9-2 mitigation measures HWQ-2 and HWQ-3.

Conclusions: TVMWD finds that construction/operation of Project Category 2 projects would not substantially alter the existing drainage pattern of the site or area through the addition of impervious surfaces that would result in increased erosion or siltation, an increase in the rate or amount of surface runoff, exceed the capacity of a stormwater drainage system, or impede or redirect flood flows with implementation of mitigation measures HWQ-2 and HWQ-3. Further, TVMWD finds that the development of Project Category 2 projects would allow the beneficial use of flood flows by directing them into new or expanded recharge facilities.

Impact 4.9-3 In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: The Six Basins project area is located within an Area of Minimal Flood Hazard based on FIRM data provided by FEMA.

Release of Pollutants During Construction

Project Category 2 project sites are all greater than one acre in size, and include excavation, trenching, soil removal and stockpiling. These activities may result in changes in drainage patterns that could result in the discharge of pollutants, soils or other construction related debris. Compliance with the requirements of a site-specific SWPPP includes the implementation of BMPs to manage runoff from construction sites. Mitigation measure HWQ-2 would ensure that the potential onsite and offsite flooding impacts would be reduced to less than significant levels and discharges from construction sites would not exceed the capacity of existing storm water drainage systems. Erosion or siltation from construction sites would also be minimized by the use of "good housekeeping" BMPs. Mitigation measure HWQ-2 for the implementation of a SWPPP or a site-specific set of BMPs for the control of stormwater runoff on sites less that one acre, would ensure that this impact would be less than significant.

Release of Pollutants During Operation

Each Watermaster Party is responsible for controlling stormwater runoff from a project site. Project Category 2 projects are all recharge basins below grade or an infiltration gallery underground, so that under normal operating conditions, stormwater would not runoff a site but be detained to percolate into the groundwater basin. For infrequent situations, runoff may occur. Therefore, the Watermaster Party operating a recharge facility shall implement mitigation measure HWQ-3 which requires a Watermaster Party to implement a drainage plan that includes design features to reduce stormwater peak concentration flows exiting a site to reduce impacts on downstream flows from its site. Implementation of mitigation measure HWQ-3 would ensure that stormwater flows from project sites are controlled on-site and released in such as manner as to prevent flooding and ensure that this impact would be less than significant.

Maintenance of the recharge basins in the spreading grounds would likely consist of removal of vegetation, silt and debris using equipment and vehicles similar to what would be used during

construction but using less of each since the object is to restore the functionality of the recharge basins, rather than construct new basins. Many of the BMPs used during construction would also be used during maintenance activities, and the development of a SWPPP to be implemented during this activity would be required. Therefore, prior to a Watermaster Party or its construction contractor, undertaking a basin restoration project, a SWPPP shall be developed and implemented as set forth in mitigation measure HWQ-3, to ensure that impacts associated with construction activities would be less than significant.

Mitigation Measures

See Findings and Facts under Section E.2.8, Impact 4.9-2 mitigation measures HWQ-2 and HWQ-3.

Conclusions: TVMWD finds that construction/operation of Project Category 2 projects would not cause a flood hazard or release pollutants into a storm drain system due to project inundation with implementation of mitigation measure HWQ-2 and HWQ-3. Further, TVMWD finds that the Six Basins project area is not located in an area with the potential to be impacted by a tsunami or seiche.

Impact 4.9-4 Violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or ground water quality? (Threshold 5)

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: During construction activities or maintenance activities during operation, mitigation measures HWQ-2 and HWQ-3 shall be implemented at each of the Project Category 2 project sites during construction activities, and during maintenance activities when a Watermaster Party proposes to remove vegetation, aggregate material, silt, and other debris that may build up in the recharge basins over time. This measure requires that prior to the commencement of construction, a Watermaster Party or its construction contractor shall prepare a SWPPP (if the area of disturbance one acre or greater) or provide the city in which construction activities will take place, with a list of BMPs and a schedule for completion of such activities. Implementation of mitigation measure HWQ-2 during initial construction and HWQ-3 when maintenance requires the use of heavy equipment and the removal of material from recharge basins in spreading grounds is required, would ensure that this impact would be less than significant.

Mitigation Measures

See Findings and Facts under Section E.2.8, Impact 4.9-2 mitigation measures HWQ-2 and HWQ-3.

Conclusions: TVMWD finds that construction/operation of Project Category 2 projects would not violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or ground water quality with implementation of mitigation measures HWQ-2 and HWQ-3.

Impact 4.9.5 Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Findings: Less Than Significant impact with Mitigation Incorporated

Facts: Regarding water quality, see discussion under impacts 4.9-2 through 4.9-4.

Regarding compliance with a sustainable groundwater management plans, Senate Bills 1168 and 1319 and Assembly Bill 1739, signed by the Governor in September 2014, amended to California Water Code to establish the "Sustainable Groundwater Management Act." The SGMA requires the development of sustainable groundwater management plans for all medium- and high-priority basins, as defined by DWR; mandates the creation of local groundwater sustainability agencies to oversee and implement the plans; and outlines the guidelines and schedule for complying with the Act. Section 10721.8 of the amended Water Code exempts adjudicated areas and local agencies that conform to the requirements of an adjudication of water rights from the provisions of the SGMA (specifically naming the Six Basins as exempt) except for the following annual reporting requirements:

> By April 1, the Six Basins Watermaster must submit to the DWR a report containing the following information to the extent available for the portion of the basin subject to the adjudication: (a) Groundwater elevation data unless otherwise submitted pursuant to Section 10932.2; (b) Annual aggregated data identifying groundwater extraction for the preceding water year; (c) Surface water supply used for or available for use for groundwater recharge or in-lieu use for the preceding water year; (d) Total water use for the preceding water year; (e) Change in groundwater storage; and (f) The annual report submitted to the court.

Pursuant to the requirements of the SGMA, the Six Basins Watermaster has incorporated reporting items "a" through "f" within each of the Annual Report submitted to date. The intent of the Strategic Plan is to continue to manage the groundwater basins in a reliable and sustainable way in order to ensure a continuous supply of water to the Watermaster Parties and their customers.

Mitigation Measures

See Findings of Fact under Section E.2.8, Impact 4.9-1 mitigation measure HWQ-1. Annual reporting under CWC Section 10721.8 is covered under HWQ-1 through the Watermaster's comprehensive groundwater level monitoring program.

Conclusions: TVMWD finds that construction/operation of Project Category 2 projects would not violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or ground water quality with implementation of mitigation measures HWQ-1, HWQ-2, and HWQ-3. Further, TVMWD finds that implementation of mitigation measure HWQ-1 to continue ongoing monitoring programs for threats of high groundwater; pumping sustainability, chronic lowering of groundwater levels, developed yield, subsurface outflows; and to updates to the operations plan as needed would ensure that the Watermaster meets the intent of the State's Sustainable Groundwater Management Act.

F.2.9 Noise

Impact 4.11-1 Generation of a substantial temporary or permanent increase in ambient noise levels, or ground-borne vibration 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?

Findings: Less Than Significant with Mitigation Incorporated

Facts: Ambient noise measurements for Strategic Plan projects included measurements near sensitive receivers located in proximity to the spreading grounds sites. Two locations were chosen to take noise measurements for each Project Category 2 project site. The average median daytime noise levels ranged from a low of 40.8 dBA near the SASG site and high of 51.0 dBA near the Fairplex site. For reference, the daytime noise threshold in cities within the Six Basins project area is 65 dBA. The average median nighttime noise levels ranged from a low of 37.3 dBA near the SASG site and high of 61.2 dBA near the Fairplex site. For reference, the nighttime noise threshold in cities within the Six Basins project area is 55 dBA. Table 4 in Section E.2.9, lists typical construction activities and the reference noise levels at 50 feet. As shown in this table, the highest construction activity is well pump drilling at 70.7 dBA. There are no wells proposed at any of the Project Category 2 project sites. Therefore, the highest noise generator for recharge projects would be crane activity at 68.3 dBA.

There are currently no site design plans for any of the Project Category 2 projects. However, the Noise Impact Analysis included a number of mitigation measures that would be implemented for most construction projects, including the development of new basins these sites, construction of new pipelines to convey water to spreading ground sites, and for the larger recharge basin in the SASG, the development of new production wells in addition to the new basins and pipelines. Mitigation Measure NOI-1 requires that a focused construction noise and vibration mitigation plan be prepared that meets the screening criteria (compliance with Noise Standards of each city or county Municipal Code). Regarding vibration, mitigation measure NOI-5 specifically addresses the distance drilling equipment and heavy mobile equipment such as dozers should be from the nearest sensitive receivers. NOI-2 and NOI-3 address construction equipment and staging areas, and NOI-4 addresses equipment and materials delivery routes.

Operation

Regarding long-term operation of recharge basins, maintenance of these basins would require periodic grading and removal of silts, vegetation or debris that has accumulated in the basin bottoms. Equipment used during maintenance would be similar to the construction equipment. Therefore, mitigation measure NOI-1 would apply to operational maintenance of the recharge basins at the SASG, TCSG and PSG. The underground infiltration gallery would not require the implementation of NOI-1 because that site is not located in proximity to sensitive receivers.

Where pumping equipment may be included at spreading grounds, NOI-6 addresses wells, pumps and related equipment and the abatement of noise through the siting and enclosure of permanent stationary equipment, long-term maintenance of the site, particularly the ground surface, and site access.

The intent of these mitigation measures is to ensure that noise associated with the construction and operation of Strategic Plan projects does not exceed the Noise Standards as set forth in each city's or county's Municipal Code. Meeting or exceeding those standards would ensure that noise associated with Project Category 2 projects, would be less than significant.

Mitigation Measures

See Findings and Facts under Section E.2.9, Impact 4.11-1 mitigation measures NOI-1 through NOI-6.

Conclusions: TVMWD finds that during construction of Project Category 2 projects (including operation maintenance activities) would not exceed noise level and vibration level standards with implementation of mitigation measures NOI-1 through NOI-5. Further TVMWD finds that for operation of Project Category projects with existing noise attenuation (walls, screening, distance to nearest receptor) and the implementation of mitigation measure NOI-6, impacts associated with the operation of Project Category 1 projects would be less than significant.

F.2.10 Public Services/Recreation

Impact 4.13-1 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: i) Fire Protection; ii) Police Protection?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts:

Construction

The SASG and TCSG, project sites are located adjacent to the foothills of the San Gabriel Mountains where wildfires may occur. Construction of new recharge basins and related facilities will occur within or near wildland areas with high fire risk. The use of spark-producing construction equipment within a fire risk area could create hazardous fire conditions and expose construction workers and nearby residences to wildfire risks. This is a potentially significant impact. Mitigation measures HAZ-5 require that fire hazard reduction measures be incorporated into a project specific Fire Management Plan (FMP) that must be implemented during construction activities. The FMP shall address all staging areas, welding areas, or areas to be disturbed that would require the operation of equipment that could produce sparks.

For the proposed expansion of the PSG recharge basins, the site is located in an urban area surrounded by residential neighborhoods, and to the west by a rural residential area and the 85-acre Rancho Santa Ana Botanical Gardens. Wildfires would be less of an issue at this site, nevertheless, the site does contain vegetation that could ignite during certain construction activities. Therefore, the City of Pomona, the Watermaster Party proposing improvements to the recharge basins, shall also be responsible for preparing and implementing an FMP before initiating construction per mitigation measure HAZ-5.

Finally, regarding the LA County Fairplex site, the proposed underground infiltration gallery would be developed in an area of the site that is devoid of vegetation, is located adjacent to paved areas, and is not located near a residential neighborhood. Typical construction precautions such as keeping the construction site clean and debris free, would ensure that a fire would not occur.

Therefore, with implementation of mitigation measure HAZ-5 no substantial adverse physical impacts affecting service ratios, response times or other performance objectives for police and fire protection services would occur for Project Category 2 projects.

Operation
There would be no habitable structures associated with the new recharge basins and on-going inspections and maintenance would include clearing vegetation from the recharge basins at the SASG, TCSG and PSG sites. The underground infiltration gallery proposed for the Fairplex site would not require such maintenance. Therefore, the development of new recharge basins or the expansion of existing basins at spreading grounds sites would not increase the need for fire services. The FMP developed for construction would (with modifications as necessary) also be implemented by contractors performing maintenance activities in an around the recharge basins within the spreading grounds areas. Therefore, with implementation of mitigation measure HAZ-6 no substantial adverse physical impacts affecting service ratios, response times or other performance objectives for police and fire protection services would occur.

Mitigation Measures

See Findings and Facts under Section F.2.7, Impact 4.8-7 mitigation measures HAZ-5 and HAZ-6.

Conclusions: TVMWD finds that during construction of Project Category 2 projects, implementation of mitigation measures HAZ-5 and HAZ-6 for the preparation and implementation of Fire Management Plans during construction and operation would ensure that impacts associated with the interruption of traffic that may adversely impact response times during construction would be less than significant.

F.2.11 Transportation

Impact 4.14-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Construction of Project Category 2 projects would be done using a combination of large construction equipment, including graders, backhoes, dozers, and haul trucks (if export of material is required). Smaller construction equipment would generally consist of vehicles including delivery trucks, pick-up trucks, and water trucks. For the TCSG, PSG and Fairplex sites construction is anticipated to take 60 to 120 days (2 to 4 months). For the SASG site, Holliday Rock has indicated that the excavation of the new recharge basin would take 3 to 5 years. For 5 years at rate of 2.5 million tons per year the total yield would be million tons of aggregate material. However, for this project, no on-road trips are proposed except for the initial startup where the equipment is brought to the site, and again with the cessation of excavation and removal of the equipment. The excavated material would be conveyed across the SASG to the Holliday Rock site in Upland.

To provide a worst-case evaluation of traffic trips, an estimated 350,000 cubic yards/year of aggregate material (500,000 tons) would be removed from the SASG site, the largest recharge basin site. Subsequently, Holliday Rock proposed to excavate and convey the material to its existing site in Upland. Using the 350,000 cubic yards/year, the Traffic Study determined a daily trip generation of 192 vehicle trips per day or the passenger car equivalent of 432 trips. Only a

fraction of these trips were estimated to occur during peak hours, 12 am and 12 pm vehicles or 36 am 36 pm peak hour trips.

Mitigation measures TR-1 through TR-3 include the development and implementation of Construction Traffic Management Plans to be approved by jurisdictions in which a project is proposed; delivery and removal of heavy equipment during off peak hours; and during site grading, if material is to be exported, limit vehicle trips to off peak hours. With implementation of these plans, impacts associated with short-term construction traffic would be less than significant.

Finally, there are no transportation/traffic impacts associated with the operation/maintenance of Project Category 2 projects were anticipated as these activities would be intermittent and be limited to one or two vehicles on site. However, periodically, recharge basins require maintenance that includes grading or scraping the bottom of the basins to ensure maximum percolation rates. At such time as a basin requires this type of maintenance, implementation of TR-1 through TR-3 shall be implemented.

Mitigation Measures

See Findings and Facts under Section E.2.11, Impact 4.14-1 mitigation measures TR-1 through TR-3.

Conclusions: TVMWD finds that during construction of Strategic Plan projects, if construction would impact a road, the Watermaster Party proposing a project would be required to develop and implement a Traffic Control Plan prior to initiating construction. Such a plan shall be consistent with the appropriate city or county Emergency Response Plan as set forth in mitigation measures TR-1 through TR-3. Implementation of a Traffic Control Plan would ensure that impacts associated with the interruption of traffic that may adversely impact response times during construction would be less than significant.

F.2.12 Utilities/Service System/Energy

Impact 4.15.4 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; and comply with federal, state, and local management and reduction regulations related to solid waste? (Threshold 4 and 5)

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Solid waste generated during construction of the proposed Project Category 2 projects would mainly consist of small quantities of general construction and demolition (C&D) debris such as concrete or asphalt (if construction requires the removal of pavement), cardboard and wrapping material, worker personal waste (food wrappers, newspapers), and possibly green waste from clearing and grubbing. Even small volumes of construction-related waste and inert demolition debris will require disposal during proposed project construction. The California Green Building Standards Code (CGBSC) requires that when construction and/or demolition is proposed, a Construction Waste Management Plan be implemented that results in the recycling and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste generated by a construction project. The Code Section states that where a local jurisdiction has more stringent ordinance, that ordinance would supersede the CGBSC.

Therefore, mitigation measure USS-2 has been identified that requires the construction contractor to submit a C&D disposal plan to a City Public Works Department for review and approval, that identifies the C&D waste to be diverted from a landfill, and a facility where the C&D waste will be taken. Implementation of a site-specific C&D Disposal Plan would ensure that this impact would be less than significant.

During operation, the generation of solid waste would be minimal as most site visits would be for inspection only. Periodic maintenance may result in the generation of small amounts of material such as vegetation and silts removed from recharge basins. This material would be taken off-site for disposal. Therefore, a less than significant impact is anticipated during operation of groundwater wells and treatment facilities.

Mitigation Measures

See Findings and Facts under Section E.2.12, Impact 4.15-4 mitigation measure USS-2.

Conclusions: TVMWD finds that implementation of mitigation measures USS-2 to prepare and implement a Construction and Demolition Disposal Plan would reduce the amount of construction and/or demolition material that would otherwise go to a landfill. Diverting C&D material from landfills helps extend the life of landfills and increase the amount of C&D material that can be recycled and reused at other construction sites.

G. PROJECT CATEGORY 3 – TEMPORARY SURPLUS

G.1 NO IMPACTS OR LESS THAN SIGNIFICANT IMPACTS IDENTIFIED IN THE FPEIR FOR PROJECT CATEGORY 3 PROJECTS

The following issues were identified in the Six Basins Strategic Plan FPEIR for Project Category 3 projects (Temporary Surplus) as having no impact or to have a less than significant impact and therefore no mitigation measures are required. All of these issues were fully addressed and substantiated in the DPEIR. All the following references are to findings in the Six Basins Strategic Plan DPEIR.

G.1.1 Aesthetics

Impact 4.1-2 Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway?

Findings: No Impact

Facts: A review of Caltrans List of Officially Designated and Eligible Scenic Highways showed that there are no designated Scenic Highways within the Six Basins project area. The 210 Freeway is listed as being eligible, however, to date, it has not been officially designated. Therefore, there would be no impact to scenic resources as viewed from a State Scenic Highway.

Conclusions: TVMWD finds that none of the proposed Project Category 3 projects would result in damage to a scenic resource within a State Scenic Highway because no such highways have been identified in the Six Basins project area.

G.1.2 Agricultural and Forestry Resources

Impact 4.2.1 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; or Conflict with existing zoning for agricultural use or a Williamson Act contract?

Finding: No Impact

Facts: A search of the California Department of Conservation, Farmland Mapping and Monitoring Program website https://www.conservation.ca.gov/dlrp/fmmp showed that there is no Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance in the project area. In the SASG, the area immediately below the San Antonio dam located within the San Bernardino County, is classified as Grazing Land. The rest of the wash area in the City of Upland is classified as Other Land. In addition, the Los Angeles County map ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf, showed that the entire Six Basins project area within Los Angeles County is classified as Other Lands. Therefore, implementation of the Strategic Plan would not result in the conversion of farmland.

Conclusions: TVMWD finds that there is no zoning for agricultural use or impacts on sites under Williamson Act contracts that would be affected by Project Category 3 projects. A review of city zoning maps for the cities of Claremont, La Verne, Pomona, and Upland revealed that there are no project sites identified in the Strategic Plan that are zoned for agricultural uses or under Williamson Act contract. Therefore, implementation of the Strategic Plan and related projects would not result in any conflict with zoning for agricultural use or impact any sites under contract.

Impact 4.2-2 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)); or Result in the loss of forest land or conversion of forest land to non-forest use?

Finding: No Impact

Facts The Six Basins project area is located on an alluvial fan emanating from the San Gabriel Mountains. The overlying land uses are largely urban/suburban and there are no forest lands designated within any of the jurisdictions that control land use within the Six Basins project area. Therefore, implementation of Project Category 3 projects would not result in the loss of forest land or conversion of forest land to non-forest use.

Conclusions: TVMWD finds that implementation of any of the Project Category 3 projects would not 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 because the overlying land uses are largely urban/suburban and there are no forest lands designated within any of the jurisdictions that control land use within the Six Basins project area.

Impact 4.2-3 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?

Findings: No Impact

Facts: Implementation of Project Category 3 projects would not result in impacts on farmland or forest land as there are no properties with this designation within the Six Basins project area. There are a few remnant groves located within the Canyon Basin area, however, none of the projects identified in the Strategic Plan be located within this basin. Therefore, there would be no impact.

Conclusions: TVMWD finds that implementation of Project Category 3 projects would not result in conversion of farmland, to non-agricultural use or conversion of forest land to non-forest use because none of these project sites support agriculture or forest/timber lands.

G.1.3 Air Quality/GHG/Global Climate Change

Impact 4.3-3 Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?

Findings: Less Than Significant Impact

Facts: Potential odor sources associated with proposed projects may result from construction equipment exhaust during construction activities. The temporary storage of typical solid waste (refuse) may also cause odors, however, during construction, contractors would be responsible for maintaining a clean orderly site as set forth in site-specific Stormwater Pollution Prevention Plans (SWPPP) (see Section G.2.7 below). Any construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the lead agency's solid waste regulations. Therefore, odors associated with the proposed project construction and operations would be less than significant and no mitigation is required.

Conclusions: TVMWD finds that impacts associated with implementation of Project Category 3 projects would be temporary during construction, and that odors can be controlled through good housekeeping on site. Further, any construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. Therefore, odors associated with the construction and operations of Project Category 3 projects would be less than significant and no mitigation is required.

Impact 4.3-6 Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Findings: Less Than Significant Impact

Facts: Proposed Strategic Plan projects including Project Category 3 projects generally consist of construction activity and do not include trip-generating land uses (residential. commercial, industrial) or facilities that would generate any substantive amount of on-going GHG emissions. Short-term GHG emissions associated with the 13-month construction schedule for the three projects selected to represent a worst-case scenario, are below the 3,000 MTCO2e/year screening threshold. Therefore, the proposed projects would not generate a significant amount of GHG emissions. The proposed Strategic Plan projects including Project Category 3 projects

would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Impacts would be less than significant in this regard.

Conclusions: TVMWD finds that Project Category 3 projects would not generate a significant amount of GHG emissions and therefore would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

G.1.4 Biological Resources

Impact 4.4-5 Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Findings: No Impact

Facts: Projects in this category include: (1) rehabilitating Pomona's P-20 wellhead treatment facility, evaluated as a Project Category 1 project (Project Category 1); (2) constructing new production wells and monitoring wells; and (3) construction of new underground pipelines to interconnect some sites. None of the Project Category 3 project sites are located in an area covered by a Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, there would be no impact associated with Project Category 3 projects.

Conclusions: TVMWD finds that proposed Project Category 3 projects would be not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan because there are no adopted conservation plans covering the Six Basins project area where Project Category 3 projects would be developed.

G.1.5 Environmental Justice

Impact 4.6-2 Result in a disproportionate decrease in the employment and/or economic base of minority and/or low-income populations of working or residing in the area surrounding the project area?

Findings: Less Than Significant Impact

Facts: Development of new Project Category 3 projects would not result in a decrease in employment and/or economic base of minority and/or low-income populations because none of the proposed projects include the displacement of any urban uses (e.g., residential, commercial, institutional) that would result in the loss of jobs.

Conclusions: TVMWD finds that Project Category 3 projects would not adversely affect employment and/or the economic base of minority and/or low-income populations because none of these projects would result in the displacement of any employment opportunities.

Impact 4.6-3 Present opportunities to address existing disproportionate impacts on minority, low-income, or indigenous populations that are addressable through the project?

Findings: No Impact

Facts: The proposed Strategic Plan, including Project Category 3 projects are neutral on the issue of disproportionate impacts on minority, low-income, or indigenous populations. The intent

of the Strategic Plan is to address water supply and water quality issues throughout the Six Basins project area regardless of residents' race or income status. Therefore, implementation of the Strategic Plan including Project Category 3 projects would not present such opportunities.

Conclusions: TVMWD finds that Project Category 3 projects would not disproportionately impact minority, low-income, or indigenous populations because the Strategic Plan addresses water supply and water quality issues throughout the Six Basins project area regardless of residents' race or income status. Therefore, implementation of the Strategic Plan including Project Category 3 projects would not present such opportunities.

G.1.6 Geology/Soils/Paleontological Resources/ Mineral Resources

Impact 4.7.5 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?

Findings: No Impact

Facts: Implementation of Project Category 3 projects do not include facilities that would require the use of septic systems. There is no planned use of a Project Category 3 project site that would require employees to be on-site for extended periods that would require the use of restroom facilities, and none are planned at any of the sites. Therefore, no impact would occur relative to soil suitability for septic tanks or alternative wastewater disposal systems

Conclusions: TVMWD finds that there are no septic systems associated with the implementation of Project Category 3 projects. Therefore, no impact would occur relative to soil suitability for septic tanks or alternative wastewater disposal systems.

Impact 4.7-7 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 loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

Findings: Less Than Significant Impact

Facts: The majority of the Six Basins project area as designated by the State as MRZ-2 which indicates that the area contains potentially significant sand and gravel deposits that are to be conserved and any proposed development plan must consider access to the deposits for purposes of extraction. However, Project Category 3 projects consist of the development of new production or monitoring wells, or new treatment facilities that would be developed on relatively small sites in urban areas. For pipeline interconnects, these projects would be linear and predominantly developed within existing rights-of-way including city streets. Likewise, the proposed pipeline between the Pomona WRP and the new recharge basin in the SASG, would likely be developed within existing rights-of-way. In summary, there are no available mineral resources that would be affected by the implementation of the proposed Strategic Plan within the cities of La Verne or Pomona, or within the portion of the Los Angeles County East San Gabriel planning area that overlays the Six Basins project area. Project Category 3 projects would not prevent the future availability of aggregate material (the known resources in the region) to be mined in the Six Basins project area such as in the SASG.

Conclusions: TVMWD finds that Project Category 3 project sites would be relatively small sites in urban areas, not suitable for mineral extraction so that there is no opportunity to recover mineral resources at these sites. Further, Project Category 3 projects would not preclude the extraction of mineral resources in areas where aggregate mining occurs.

G.1.7 Hazards/Hazardous Materials/Airport Safety/Wildfire

Impact 4.8-4 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?

Findings: Less Than Significant Impact

Facts: Project Category 3 projects include the development of new production and monitoring wells, and related treatment facilities that would be similar in size and function as those projects identified in Project Category 1 - Project Category 1. No structures or trees greater than 35 feet would be developed/grown on site, and no spreading grounds or other water retention basin would be developed. Therefore, regarding the potential for new production or monitoring wells or treatment facilities to adversely impact airport operations would be less than significant. Project Category 3 projects also include pipelines and interconnects between wells and treatment facilities. Once constructed these facilities would be underground. Therefore, construction and operation of new pipelines and interconnects to adversely impact airport operations would be less than significant.

Conclusions: TVMWD finds that implementation of any of the Project Category 3 projects would not result in a safety hazard or excessive noise for people residing or working in the project area. Project Category 3 projects include the development of new production and monitoring wells and treatment facilities similar to existing facilities identified in Project Category 1 - Project Category 1 where no permanent or long-term human activity (residents or employees) would occur. Therefore, proposed Project Category 3 projects would not conflict with any of the Airport Land Use Compatibility Plans.

Impact 4.8-9 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?

Findings: Less Than Significant Impact

Facts:

Production Wells

There are no occupants (residents or employees) associated with the Project Category 3 projects. Development of new production and monitoring wells would occur on sites within the cities of Claremont, La Verne, Pomona, and Upland. Two recent examples for this type of project are the two production wells recently developed by TVMWD in the City of Claremont, that will be connected via pipeline to its Miramar Water Treatment Plant. The first was developed at the terminus of Grand Avenue, south of Baseline Road adjacent to the 210 Freeway. The area is developed with a mix of single family and multi-family neighborhoods and is located approximately 1.5 miles south of the San Gabriel mountains. The second site is at the northwest corner of

Grand Avenue and Miramar Avenue in an established single-family neighborhood approximately southeast of the San Gabriel mountains. Therefore, the construction and operation of new production wells or monitoring wells in similar locations as Project Category 1 – Project Category 1 projects 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 changes.

Pipelines and Interconnects

Pipelines and interconnects would be developed as new production wells become operational, or where existing wells may be connected to water treatment facilities such as the City of Pomona's P-20 well site in Lower Claremont Heights Basin that may be connected via pipeline to the TVMWD Miramar WTP and would be constructed along existing roads in the City of Claremont. Because pipelines and interconnects are directly linked to new production wells in urban locations, the construction and operation of these new facilities 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 changes.

The new pipeline proposed to connect the Pomona WRP to the new recharge basin at the SASG would generally be constructed in existing roadways through urban areas with the exception of the pipeline and interconnection as it enters the SASG. The pipeline alignment represents a narrow area of disturbance that may be revegetated once the trench is backfilled. This new vegetation could burn in a wildfire and contribute to the risk of post-fire instability. However, the SASG is located at an elevation below the surrounding neighborhoods along the west side of the SASG, and on the east side of the SASG are established aggregate mining pits. Therefore, this project's contribution to post-fire slope instability and related landslides or changes in drainage represents a less than significant impact.

Conclusions: TVMWD finds that the development of Project Category 3 projects 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 changes because most of these projects would be located within the flatter areas of the Six Basins in urban areas.

G.1.8 Land Use/Planning

Impact 4.10-1 Physically divide an established community?

Findings: No Impact

Facts: Construction of new production or monitoring wells could be developed on sites already developed with water supply facilities or on vacant properties owned by the various water agencies set aside for the purpose of developing additional production and/or monitoring wells in the future. Where a new well is proposed and additional property is required, the assumption has been made that new sites would be similar in size and location as existing well sites, that is one to two acres in size.

Likewise, construction of new underground pipelines to interconnect some sites would not result in the division of a community because all pipeline construction and operation would occur underground. Construction of the new pipelines could cause some temporary access issues by

requiring residents to take a detour however, this would be a temporary situation that would be alleviated once the pipeline construction was completed. Therefore, development of new pipelines between a well site and an existing pipeline to connect the new well to a water treatment plant would not divide an established community.

Finally, Pomona's P-20 site is an approximately 2-acre site surrounded by single-family neighborhoods on the north, west and south and, on the east by Claremont High School and related playing fields and courts. Rehabilitation of the existing facility would not divide these existing neighborhoods, or alter access to the high school, and no expansion in the size of the project site is proposed.

Conclusions: TVWMD finds that Project Category 3 project sites would be developed in urban areas on individual sites already owned or that would be purchased by a Watermaster Party. Pipeline interconnects would all be developed under existing right-of-way (streets) because none of the Project Category 3 projects would require the removal of residential units. Therefore, there would be no impact.

Impact 4.10-2 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?

Findings: No Impact

Facts: The Findings for consistency with regional or State planning documents or rules/regulations are included in the following sections: E.2.2 *Air Quality/Greenhouse Gases/Global Climate Change*, for consistency with the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP), E.2.6, *Geology/Soils/Mineral Resources/Paleontological Resources*, for consistency with the California Building Standards Code, E.2.7, *Hazards/Hazardous Materials/Airport Safety/Wildfire Hazards*, for consistency with Airport Land Use Plans, E.2.8, *Hydrology and Water Quality*, for consistency with Regional and State Water Quality Standards.

Therefore, the Land Use section of the DPEIR was limited to the analysis of the consistency of proposed *Temporary Surplus* projects to the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategies. (RTP/SCS). SCAG's focus is on transportation and land use decisions that would result in reduced dependance on cars and vehicle miles traveled, as well as increased energy efficiency and increased use of non-motorized transportation. Construction and operation of Temporary projects would create a minimal number of trips associated with on-going operation and maintenance of wells, treatment facilities and spreading grounds. Therefore, impacts would be less than significant.

Conclusions: TVMWD finds that the analysis of the potential for Project Category 3 projects to conflict with SCAG's RTP/SCS goals for regional transportation showed that construction and operation of Temporary projects would create a minimal number of trips associated with on-going operation and maintenance of wells and treatment facilities. The Strategic Plan was found to be consistent with the goals of the RTP/SCS or that no inconsistencies were identified.

G.1.9 Noise

Impact 4.11-2 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?

Findings: Less Than Significant Impact

Facts: The Strategic Plan does not include any residential land use, therefore implementation of Project Category 3 projects would not include any new residents that would be adversely affected by proximity to an airport or private airstrip. In addition, proposed projects identified in the Strategic Plan do not include any sites where permanent employees would be located. Once construction is complete, operation and maintenance tasks would be performed by workers working on site intermittently and not for extended periods. When on a site located within the AIA of one of the airports, workers may occasionally hear airplanes pass by overhead however, they would not be exposed to substantial, long-term airport-related noise. Therefore, the proposed Project Category 3 projects would not expose persons to excessive airport-related noise levels. Exposure to airport noise would be a less than significant impact.

Conclusions: TVMWD finds that proposed Project Category 3 projects would not expose persons to excessive airport-related noise levels because none of the projects include residents or employees on site.

G.1.10 Population/Housing

Impact 4.12-1 Would the project 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)?

Findings: No Impact

Facts: Project Category 3 projects consist of constructing up to 12 new groundwater production wells and a treatment facility, and up to 3 monitoring wells in the Pomona Basin; and constructing new interconnects between new production wells and a new treatment facility, and one between the existing Pomona WRP and the new SASG recharge basin. The rehabilitation of the P-20 well site was evaluated in Project Category 1. There are no plans to include new homes or businesses at or near any of these sites. Therefore, there would be no population or housing impact in the Six Basins project area associated with Project Category 3 projects.

Conclusions: TVMWD finds that because there are no new homes or businesses associated with Project Category 3 projects, they would not induce substantial unplanned population growth either directly or indirectly.

Impact 4.12-2 Would the project displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere?

Findings: No Impact

Facts: There are no plans to include new homes or businesses at or near any of the Project Category 3 sites. Therefore, there would be no population or housing impact in the Six Basins project area associated with Project Category 3 projects.

Conclusions: TVMWD finds that because there are no new homes or businesses associated with Project Category 3 projects, they would not require the construction of replacement housing elsewhere, and there would be no housing impact in the Six Basins project area associated with Project Category 3 projects.

G.1.11 Public Services/Recreation

Impact 4.13-2 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; or include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Findings: No Impact

Facts: Implementation of the Strategic Plan would allow the Watermaster Parties to develop new monitoring wells and production wells with associated pipelines to connect to existing water supply pipelines or the existing water treatment plants. There are no Project Category 3 projects that would result in any new residents or employees that would result in an increase in 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. In addition, none of the proposed Project Category 3 projects include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, there would be no impact.

Conclusions: TVMWD finds that the construction and operation of Project Category 3 projects would not result in an increase in the use of parks or recreation facilities because no new residents or employees are associated with these projects.

G.1.12 Transportation

Impact 4.14-2 Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Findings: No Impact

Facts: CEQA Guidelines Section 15064.3(b) sets forth the criteria for analyzing transportation impacts. Specifically, this section of the Guidelines focuses on land use projects and associated vehicle miles traveled. This assumes a project has either residents or employees that travel to and from a project site on a daily basis. Subsection (b)(4) describes a lead agency's discretion in choosing the most appropriate methodology to evaluate a project's vehicle miles traveled.

Upon completion of construction activities, proposed Project Category 3 projects would generate negligible vehicle miles traveled because once constructed, vehicle trips would be limited to scheduled maintenance. No substantial number of daily vehicle trips are associated with the ongoing operation of Project Category 3 because there are no permanent residents or employees associated with project operation at any of the sites. Therefore, operation of these projects would not conflict or be inconsistent with the intent of CEQA Guidelines Section 15063(b).

Conclusions: TVMWD finds that because there are no permanent residents or employees associated with project operation at any of the Project Category 3. Therefore, operation of these

projects would not conflict or be inconsistent with the intent of CEQA Guidelines Section 15063(b).

G.1.13 Utilities/Service Systems/Energy

Impact 4.15-2 Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Findings: Less Than Significant Impact

Facts: Project Category 3 projects, are intended to ensure the continued availability of water supplies in the Six Basins project area.

These projects would assist the Watermaster Parties in increasing the reliability of water supplies available to meet the needs within the Six Basins project area during normal, dry, and multiple dry years. This would be accomplished by developing new production and monitoring wells and new pipeline conveyance systems in order to move water between water agencies' facilities as needed.

Conclusions: TVMWD finds that the intent of the Strategic Plan, and Project Category 3 projects is to increase the reliability and sustainability of the water supply within the Six Basins project area by upgrading existing groundwater production wells to increase capacity, and to upgrade or develop new treatment facilities at these sites in order to treat local groundwater to drinking water standards. Therefore, development of Project Category 3 projects would have a less than significant impact to the water supply.

Impact 4.15.3 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?

Findings: No Impact

Facts: During construction of improvements at the Project Category 3 project sites there would be no discharge to existing wastewater systems associated with the proposed projects. Portable toilets would be used at each site, and the sanitary wastes would be hauled from each site for appropriate disposal at a regional wastewater treatment facility. Likewise, during long term operation of water recharge facilities, there would be no employees on site on a daily basis that would require restroom facilities. Site inspections may occur on a daily basis where a water district or water company employee would enter the site to inspect operating conditions, but these site visits would be short, and no extended stay is anticipated that would require restroom facilities. Therefore, none of the Project Category 3 projects represent a projected demand for wastewater treatment, and there is no impact on a wastewater treatment provider's ability to serve existing commitments. During construction, portable toilets and hand wash stations would be delivered to a site and serviced (pumped and transported off site) by a professional service provider.

Conclusions: TVMWD finds that during construction and operation of Project Category 3 projects there would be no impact on wastewater treatment providers because these projects would not result in any new residents or employees at project sites.

Impact 4.15.5 Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Findings: Less Than Significant Impact

Facts:

Construction

The Energy Analysis prepare for the Program EIR (Final EIR Appendix H) concluded that the estimated power cost of on-site electricity usage during the construction of Strategic Plan projects is approximately $72,745.51. Additionally, based on the assumed power cost, it is estimated that the total electricity usage during construction is calculated to be around 759,467 kWh.

Construction equipment used by Strategic Plan projects would result in single event consumption of approximately 116,359 gallons of diesel fuel. Construction equipment use of fuel would not be atypical for the type of construction proposed because there are no aspects of the project's proposed construction process that are unusual or energy-intensive, and project construction equipment would conform to the applicable CARB emissions standards, acting to promote equipment fuel efficiencies.

CCR Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Best available control measures inform construction equipment operators of this requirement. Enforcement of idling limitations is realized through periodic site inspections conducted by City building officials, and/or in response to citizen complaints.

Construction worker trips would result in the estimated fuel consumption of 6,834 gallons. Additionally, fuel consumption from construction vendor trips will total approximately 6,590 gallons. Diesel fuel would be supplied by local and regional commercial vendors. Indirectly, construction energy efficiencies and energy conservation would be achieved through the use of bulk purchases, transport and use of construction materials. The 2019 Integrated Energy Policy Report (IEPR) released by the California Energy Commission (CEC) has shown that fuel efficiencies are getting better within on and off-road vehicle engines due to more stringent government requirements. As supported by the preceding discussions, construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

Operations

Maintenance of proposed Project Category 3 projects would include remote monitoring via Watermaster Party computer systems, meter readings, routine inspections and maintenance of facilities, periodic testing, and emergency repairs. Maintenance activities would occur on an as-needed basis (1 trip per week was assumed). The operation of a pump station (well) as well as vehicle trips by maintenance staff would require the consumption of energy resources in the form of electricity and vehicle fuels. However, electricity and fuel consumption would not be wasteful,

inefficient, or unnecessary as maintenance activities would only occur as necessary for well pump operation. Therefore, no operational energy impacts would occur.

SB 100 mandates 100 percent clean electricity for California by 2045. SCE has achieved over 46 percent Carbon-Free energy sources as of the 2018 Suitability Report. As the proposed project would be powered by the existing electricity grid (SCE), the project would eventually be powered by renewable energy mandated by SB 100 (50 percent by 2026 and 100 percent by 2045) and would not conflict with the statewide plan. TVMWD, for example, has not yet adopted specific renewable energy or energy efficiency plans with which the project could comply. Nonetheless, the project would not conflict with or obstruct the State plan for renewable energy; therefore, no impact would occur.

Conclusions: TVMWD finds that in recognition of the objectives of the Strategic Plan which is to construct facilities necessary for Watermaster Parties to meet their customers' current and projected water demands, the required energy use is not anticipated to result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

G.2 IMPACTS THAT WOULD BE LESS THAN SIGNIFICANT IMPACTS WITH IMPLEMENTATION OF MITIGATION MEASURES IDENTIFIED IN THE FPEIR FOR PROJECT CATEGORY 2 PROJECTS

G.2.1 Aesthetics

Impact 4.1-1 Have a substantial adverse effect on a scenic vista?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts:

Rehabilitating Pomona's P-20 Wellhead and Treatment Facility

Because the P-20 well site would be rehabilitated, this project was evaluated as part of Project Category 1. See Findings and Facts under Section E.2.1, Impact 4.1-1.

Construct New Production and Monitoring Wells

New production wells and related pipelines to interconnect to off-site water treatment plants, and new monitoring wells would be developed underground. Aboveground pumps and related equipment would be housed within a small concrete masonry unit block building that will provide security and sound attenuation. Well sites would include perimeter fencing and access gate and landscaping, and would be designed to blend in with the surrounding urban area in which they are placed. To ensure that improvements would result in a less than significant impact on a scenic vista, the Watermaster Party proposing a new well would consult with city staff of the relevant city to coordinate the development of the site from an aesthetic perspective. Mitigation measure AES-1 requires a project applicant to design a facility/site in coordination with local jurisdictions, to the extent feasible taking into consideration the needs of the project. Therefore, with implementation of Mitigation measure AES-1, this impact would be less than significant.

Construct New Interconnects

New interconnects between wells and treatment facilities would all be underground. Therefore, this set of projects would not result in an adverse impact on scenic vistas.

Mitigation Measures

See Findings and Facts under Section E.2.1, Impact 4.4-1 mitigation measure AES-1.

Conclusions: TVMWD finds that implementation of mitigation measure AES-1 can reduce potential adverse aesthetics impacts to a level of less than significant. This measure would minimize impacts to scenic vistas by working with the local jurisdiction to meet local design standards to the extent feasible taking into consideration the needs of the project.

Impact 4.1-3 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 a 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?

Findings: Less than Significant Impact with Mitigation Incorporated

Facts: Project Category 3 projects consist of constructing new production wells and a treatment facility in the Pomona Basin along with three new monitoring wells in the area of historical high groundwater; constructing new production wells in the Upper Claremont Heights basin; and constructing new interconnects between wells, and one between the existing Pomona WRP and the SASG. To ensure that improvements would result in a less than significant impact on visual character or quality of public views, a Watermaster Party proposing such upgrades to existing sites would consult with the appropriate city staff through a city's Development Review process that would include review of plans including construction drawings, site plans, landscape plans etc., typically required of a development application. Mitigation measure AES-1 requires a project applicant to design a facility/site in coordination with local jurisdictions to reduce potential visual effects, to the extent feasible taking into consideration the needs of the project.

Mitigation Measures

See Findings and Facts under Section E.2.1, Impact 4.4-1 mitigation measure AES-1.

Conclusions: TVMWD finds that implementation of mitigation measure AES-1 can reduce potential adverse impacts on the existing visual character or quality of public views to a level of less than significant. This measure would minimize impacts to scenic vistas by working with the local jurisdiction to meet local design standards.

Impact 4.1-4 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Findings: Less than Significant Impact with Mitigation Incorporated

Facts: Development of new production wells would require new construction of wells, pumps, interconnects and pumphouse. Development of new monitoring wells would require new

construction of wells, pumps and pumphouse. As individual projects are proposed, the Watermaster Party proposing the new well project would meet with development services or planning staff of the respective city to ascertain site development requirements including height and location of light poles, types of building materials (non-reflective), and landscaping (i.e., trees for screening the site if applicable). Measures have been identified to address the potential for light and glare to adversely affect adjacent properties. These are mitigation measures AES-2 through AES-4 that would be implemented to the extent feasible taking into consideration the needs of the project. Compliance with these measures would ensure that impacts associated with light, and glare would be less than significant.

New interconnects between wells and water treatment plants, and between the existing Pomona WRP and the new SASG would not create new light and glare as these facilities would be underground.

During construction, lighting may be required intermittently if work crews must work after dark to complete a task. However, this is highly unlikely and therefore would constitute an incidental, short term impact that would not be significant.

Mitigation Measures

See Findings and Facts under Section E.2.1, Impact 4.1-1 mitigation measures AES-1 to AES-4.

Conclusions: TVMWD finds that implementation of mitigation measures AES-2, AES-3 and AES-4 can reduce potential adverse impacts associated with new light and glare to a level of less than significant. Design of proposed facilities consistent with local design standards would result in a less than significant impact to visual character and public views to the extent feasible taking into consideration the needs of the project.

G.2.2 Air Quality/Greenhouse Gas Emissions

Impact 4.3.1 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?

Findings: Less Than Significant with Mitigation Incorporated

Facts:

Construction

As described in Findings Section E.2.2 above, because the Program EIR evaluated the development of Strategic Plan projects over a 20-year period, for purposes of analysis of air emissions, construction of a set of projects (one from each Project Category) that could be developed over an approximately 13-month period was conducted. Construction duration utilized in the analysis represents a "worst-case" analysis. Should construction occur any time after the respective dates since emission factors for construction decrease as the analysis year increases. Projects evaluated in this scenario included the following: (1) a treatment facility with related infrastructure (Project Category 1); (2) the construction of the San Antonio Spreading Grounds with the disturbance approximately 50 acres to a depth of up to 200 feet, and the removal of approximately 2.5 million tons (approximately 1.79 million cubic yards) of aggregate material that would be conveyed across the SASG to the existing Holliday Rock aggregate mine site east of the San Antonio Creek channel

(Project Category 2); and (3) up to 8,500 linear feet of pipeline construction (Project Category 3).

The estimated maximum daily construction emissions with implementation of mitigation measures are summarized on Table 1. Under the assumed scenario emissions resulting from construction activities would not exceed criteria pollutant thresholds established by the SCAQMD for emissions of any criteria pollutant. This conclusion assumes compliance with all applicable SCAQMD Rules for construction activities. Mitigation measures AQ-1 through AQ-3 shall be implemented during construction activities at Project Category 3 project sites.

During operation, long-term air quality impacts occur from mobile source emission generated from project-related traffic inspections (daily or weekly). Maintenance activities may consist of basin restoration where grading equipment would be brought in when the bottom of a basin needs to be graded to remove silt and debris to restore functionality. Maintenance activities would utilize similar equipment to that used for construction of the basins. Therefore, mitigation measures for construction of recharge basins would also apply when such maintenance is required.

Operations Impacts

Mobile Source Emissions

Long-term air quality impacts occur from mobile source emission generated from project-related traffic and from stationary source emissions generated from natural gas. The proposed Strategic Plan projects primarily involve construction activity. For on-going operations, mobile emissions would be generated by the motor vehicles traveling to and from project sites during frequent inspections (daily or weekly) and periodic maintenance. These trips are not anticipated to be lengthy and would not result in any substantive new long-term emissions sources.

Stationary Source Emissions

Stationary energy emissions would result from energy consumption associated with the proposed wells (production and monitoring) and treatment facilities. All pumps and generators associated with these projects would be electrically powered and would not directly generate air emissions. However, the Air Quality Impact Analysis (DPEIR Appendix B.1) assumed that well sites would include the use of an emergency diesel generator, allowing the well pump to run on backup power in case of emergency. If a backup generator would be installed, the lead agency would be required to obtain the applicable permits from SCAQMD for construction and operation of such equipment. Backup generators, if used, would be used only in emergency situations and for routine testing and maintenance purposes and would not contribute a substantial amount of emissions capable of exceeding SCAQMD thresholds. As the operations of proposed Strategic Plan projects would not exceed SCAQMD thresholds, their operation would not violate an air quality standard or contribute to an existing violation. Therefore, project operations would not result in a cumulatively considerable net increase of any criteria pollutant and impacts would be less than significant.

Mitigation Measures

See Findings and Facts under Section E.2.2, Impact 4.3-1mitigation measures AQ-1 through AQ-3.

Conclusions: TVMWD finds that construction and operation of Project Category 3 projects, would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in non-attainment. Backup generators would be used only in emergency situations and for routine testing and maintenance purposes and would not contribute a substantial amount of emissions capable of exceeding SCAQMD thresholds. As project operations would not exceed SCAQMD thresholds, the project would not violate an air quality standard or contribute to an existing violation. Therefore, project operations would not result in a cumulatively considerable net increase of any criteria pollutant and impacts would be less than significant.

Impact 4.3.2 Expose sensitive receptors to substantial pollutant concentrations?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts:

Construction

Consistent with SCAQMD's LST Methodology, a 25-meter receptor distance was utilized in the Air Quality analysis for the set of projects representing the Strategic Plan and provides for a conservative i.e., "health protective" standard of care. The SCAQMD's screening look-up tables were used to determine project impacts. It should be noted that since the look-up tables identify thresholds at only 1 acre, 2 acres, and 5 acres, linear regression was utilized, consistent with SCAQMD guidance, in order to interpolate the threshold values for the other disturbed acreage and distances not identified in the look-up tables. The assumption was made that the proposed construction activities could actively disturb approximately one acre per day.

The LST analysis showed that without mitigation, localized construction emissions would exceed the applicable SCAQMD LSTs for emissions of PM10. However, after implementation of mitigation measures AQ-1 through AQ-3, construction-source emissions would not exceed the applicable SCAQMD LSTs thresholds and would be less-than-significant.

Operations

LSTs would apply to the operational phase of a proposed project if the project includes stationary sources or attracts mobile sources that may spend extended periods queuing and idling at the site (e.g., warehouse or solid waste transfer facilities). As previously discussed, proposed Strategic Plan projects would generate a nominal number of traffic trips in the context of on-going maintenance resulting in a negligible amount of new mobile source emissions. Additionally, all well pumps identified in the Strategic Plan (production and monitoring) were assumed to be electrically powered and would not directly generate air emissions. However, some projects may include the use of an emergency diesel generators, allowing a well pump to run on backup power in case of emergency. If a backup generator is installed, the lead agency would be required to obtain the applicable permits from SCAQMD for operation of such equipment. Upon compliance with SCAQMD permitting procedures, localized emissions from any potential diesel generator would not result in substantial pollutant concentrations capable of exceeding operational LST thresholds. Therefore, the proposed Strategic Plan projects would not expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant.

Mitigation Measures

See Findings and Facts under Section E.2.2, Impact 4.3-1 mitigation measures A-1 through AQ-3.

Conclusions: TVMWD finds that construction and operation of Project Category 3 projects, would not result in the exposure of sensitive receptors to substantial pollutant concentrations with implementation of mitigation measures A-1 through AQ-3. Further, TVMWD finds that as operations would not exceed SCAQMD thresholds, a project would not violate an air quality standard or contribute to an existing violation. Therefore, Project Category 3 operations would not result in the exposure of sensitive receptors to substantial pollutant concentrations that are above SCAQMD's LST thresholds.

Impact 4.3-4 Conflict with or obstruct implementation of the applicable air quality plan?

Findings: Less Than Significant with Mitigation Incorporated

Facts: The project's consistency with the SCAQMD Air Quality Management Plan (AQMP) was determined using the 2016 AQMP.

Consistency Criterion No. 1: The proposed Strategic Plan projects would not 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.

The violations that Consistency Criterion No. 1 refers to are related to the California Ambient Air Quality Standards (SCAAQS) and the National Ambient Air Quality Standards (NAAQS). CAAQS and NAAQS violations would occur if regional or localized significance thresholds were exceeded. A project would not exceed the applicable LST thresholds or regional significance thresholds for construction activity after implementation of applicable mitigation measures AQ-1 through AQ-3. Therefore, implementation of Strategic Plan projects would not conflict with the AQMP according to this criterion.

Consistency Criterion No. 2: The proposed Strategic Plan projects would not exceed the assumptions in the AQMP based on the years of Project build-out phase.

The 2016 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the Air Basin are provided to SCAG, which develops regional growth forecasts, that are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in the adopted general plans for the cities of Claremont, La Verne, Pomona, Upland and the counties of Los Angeles and San Bernardino is considered to be consistent with the AQMP.

Mitigation Measures

See Findings and Facts under Section E.2.2, Impact 4.3-1 mitigation measures A-1 through AQ-3.

Conclusions: TVMWD finds that the construction and operation of proposed Project Category 3 projects would not result in or cause NAAQS or CAAQS violations with implementation of mitigation measures AQ-1 through AQ-3. The Watermaster Parties are not

proposing land uses that would result in the generation of excessive criteria pollutants either during construction or operation. The proposed Project Category 3 projects are therefore considered to be consistent with the AQMP.

Impact 4.3-5 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts:

Construction

Project construction actvities would generate carbon dioxide (CO2), methane (CH4) and nitrous oxide (N2O) emissions. Construction would generate a total of approximately 1,222.28 $MTCO_2e/yr$. The analysis assumed the implementation of mitigation measures AQ-1 through AQ-3 during construction. As such, with mitigation, the projects would not exceed the SCAQMD's recommended numeric threshold of 3,000 $MTCO_2e/yr$ if it were applied. Thus, project-related emissions associated with the construction scenario used to analyze air quality would not have a significant direct or indirect impact on GHG and climate change and no mitigation or further analysis is required.

Operations

In terms of operational GHG emissions, there are no buildings, other than small buildings to house the well pumps and related monitoring equipment and electrical room. Therefore, there would be no permanent source or stationary source emissions. While it is anticipated that Project Category 3 projects would require intermittent inspection to be efficient, such inspections would be minimal requiring a negligible amount of traffic trips on an annual basis. Therefore, Project Category 3 project operations would not generate a significant amount of GHG emissions.

Mitigation Measures

See Findings and Facts under Section E.2.2, Impact 4.3-1 mitigation measures A-1 through AQ-3.

Conclusions: TVMWD finds that the construction and operation of proposed Project Category 2 projects would not exceed the SCAQMD's recommended numeric threshold of 3,000 $MTCO_2e/yr$ if it were applied with implementation of mitigation measures AQ-1 through AQ-3 for the control of construction related GHG emissions. Therefore, operation of Strategic Plan projects would not exceed the SCAQMD's recommended numeric threshold.

G.2.3 Biological Resources

Impact 4.4-1 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.

Findings: Less Than Significant Impact with Mitigation Incorporated.

Facts: Rehabilitation of the P-20 well site was evaluated with Project Category 1 projects in Findings of Facts in Section E.2.3, Impact 4.4-1.

Construction of New Production Wells and Monitoring Wells

The Strategic Plan calls for the construction of up to 12 new production wells in the Upper Claremont Heights Basin and up to three new monitoring wells in the Pomona Basin within the area of historical high groundwater. However, the locations of these sites are unknown at this time. Because future well sites are unknown, there is a potential to adversely impact species identified as a candidate, sensitive, or special status species, through habitat modification. Therefore, implementation of mitigation measure BIO-1a and BIO-1b, if trees must be trimmed or removed, and mitigation measure BIO-2 to conduct nesting bird surveys prior to commencement of construction activities where trees or other vegetation may be affected shall be required. In addition, where a Watermaster Party is proposing a new well outside the urban area, a Biological Resources Assessment may be required. The requirements for completion of such an assessment are set forth in mitigation measure BIO-3.

Construction of New Pipeline Interconnects

New pipeline interconnects would all be developed underground. This would require construction and excavation to place and connect the pipeline. As described in Section 3.6.1, *Construction Activities*, in Chapter 3, *Project Description*, up to 85,000 linear feet (approximately 16 miles) of new pipeline may be installed between wells and treatment plants, generally located within the urban areas of the Six Basins project area and within the public right-of-way. Where portions of the new pipeline interconnections could be constructed in undeveloped area, these would include the interconnect between the P-20 well site and the TVMWD Water Treatment Plant, or between the Pomona Water Reclamation Plant to the San Antonio Spreading Grounds where construction activity would occur in or adjacent to the San Antonio Creek wash area.

Because future alignments are conceptual at this time, there may be a potential to adversely impact species identified as a candidate, sensitive, or special status species, through habitat modification, for example where trenching in the SASG would be required to interconnect the line between the Pomona WRP and the new SASG recharge basins. Therefore, implementation of mitigation measures BIO-1a, BIO-1b, BIO-2 and BIO-3 may be required prior to commencing with construction activities.

Mitigation Measures

See Findings and Facts under Section E.2.2, Impact 4.4-1 mitigation measures BIO-1a, BIO-1b and BIO-2, and under Section F.2.2, Impact 4.4-2 mitigation measure BIO-3.

Conclusions: TVMWD finds that with implementation of mitigation measures BIO-1a, BIO1b, BIO-2, and BIO-3, for Project Category 3 projects that may affect habitat or nesting birds through ground disturbance such as grading and the removal of vegetation, as well as trimming the existing trees or shrubs, impacts associated with Project Category 3 projects would be less than significant.

Impact 4.4-2 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 (Threshold 2); or 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?

Findings: Less Than Significant with Mitigation Incorporated

Facts: Rehabilitation of the P-20 well site was evaluated with Project Category 1 projects in Findings and Facts Section E.2.3, Impact 4.4-2.

Construction of New Production Wells and Monitoring Wells

The Strategic Plan calls for the construction of up to 12 new production wells in the Upper Claremont Heights Basin, and up to three new monitoring wells in the Pomona Basin within the area of historical high groundwater. For the purposes of this analysis, it was assumed that new well sites would be located in urban areas within the Six Basins project area and not within undeveloped areas where jurisdictional waters or wetlands would be present. Therefore, the construction of new production wells and monitoring wells would not result in a substantial adverse effect on jurisdictional waters or wetlands.

Construction of New Pipeline Interconnects

New pipeline interconnects would all be developed underground. This would require construction and excavation to place and connect the pipeline. As described in Section 3.6.1, *Construction Activities*, in Chapter 3, *Project Description*, up to 85,000 linear feet (approximately 16 miles) of new pipeline may be installed between wells and treatment plants, generally located within the urban areas of the project area and within the public right-of-way. Therefore, the construction of new pipeline interconnects in urban areas would not result in a substantial adverse effect on jurisdictional waters or wetlands. Where portions of the new pipeline interconnections could be constructed in undeveloped area, these would include the interconnect between the P-20 well site and the TVMWD WTP, and between the Pomona WRP and the new SASG recharge basins where construction activity would occur in or adjacent to the San Antonio Creek wash area. As described above under Impact 4.4-2, during the field visits to the SASG, the project area was surveyed with 100 percent visual coverage and no definable bed or bank features exist within the SASG project study area. In addition, construction of new pipeline interconnects to the TVMWD WTP, an existing facility adjacent to existing roads (Padua and Miramar Avenues), would not adversely impact riparian habitat or jurisdictional waters.

However, because the final location of the proposed pipeline alignment is unknown, implementation of mitigation measure BIO-4 may be required should the new facility result in impacts to jurisdictional wetlands. This measure requires consultation with the regulatory agencies and may require permits under Sections 401 and 404 of the federal Clean Water Act, and Section 1602 of the California Fish and Game Code.

Conclusions: TVMWD finds that with implementation of mitigation measure BIO-4 requiring consultation with regulatory agencies if jurisdictional waters are found on a project site, and compliance with the requirements of permits that would be issued by these agencies, impacts associated with the development of Project Category 3 projects would be less than significant.

Impact 4.4-3 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? (Threshold 4)

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Rehabilitation of the P-20 well site was evaluated with Project Category 1 projects in Findings and Facts Section E.2.3, Impact 4.4-3.

Construction of New Production Wells and Monitoring Wells

The locations of future production and/or monitoring wells are unknown at this time. However, because new sites are unknown, mitigation measure BIO-3 shall be implemented prior to any ground disturbing activities at proposed sites that have potential habitat for wildlife species. With implementation of this measure, impacts associated with new well sites on migration or movement would be less than significant.

Construction of New Pipeline Interconnects

Regarding the development of new pipeline interconnects between new well sites and treatment facilities, between the Pomona WRP and the new SASG recharge basin, and between the P-20 well site and the TVMWD Miramar WTP, would generally be developed within existing rights-of-way, either in existing streets or within public parkways. Where pipelines would be constructed within existing streets, no impacts to wildlife species would occur. Most of the pipeline between the Pomona WRP and the new SASG recharge basin would be constructed within existing streets and would not affect wildlife. However, where the pipeline enters the SASG, there is a potential for temporary but adverse impact on wildlife movement. Therefore, prior to commencing with pipeline construction in the SASG, the Watermaster Party proposing the project shall implement mitigation measure BIO-3 to conduct a biological resources assessment to determine presence/absence of species, and to prepare a mitigation strategy for review by CDFW. Should species be identified, an Incidental Take Permit from CDFW may be required. Implementation of mitigation measure BIO-3 would ensure that impacts to special status species can be mitigated to the satisfaction of CDFW. After pipelines are installed, there should be minimal impact on migration or movement.

Impact 4.4-4 Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Watermaster Parties with existing facilities have worked with local jurisdictions to mitigate potential impacts on the surrounding neighborhoods through compliance with standards and requirements set forth by State agencies and regional agencies (e.g., SCAQMD and RWQCB), for impacts related to air quality, noise, and control of stormwater. This is expected to be similar at future well sites where Watermaster Parties performing maintenance at their facilities. In order to continue to be "good neighbors" mitigation measures BIO-1a, BIO-1b, and BIO-2 are intended to comply with CDFW requirements regarding nesting birds and are also intended to allow Watermaster Parties the flexibility to operate facilities in a safe and efficient manner while still being "good neighbors".

Conclusions: TVMWD finds that construction of a new production and monitoring wells, and treatment facilities or the construction of new pipeline interconnects where vegetation removal may be required, may require trimming the existing trees or shrubs. Depending on the time of year, this activity may require a pre-construction nesting bird survey. Mitigation measures BIO-1, BIO-1b, and BIO-2 would apply to Project Category 3 sites. Implementation of these measures would ensure that potential impacts on nesting birds would be less than significant.

G.2.4 Cultural Resources/Tribal Cultural Resources

Impact 4.5-1 Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5, Determining the Significance to Archaeological and Historical Resources? (Threshold 1)

Findings: Less Than Significant with Mitigation Incorporated

Facts: The rehabilitation of the P-20 site would result in similar impacts as identified under Project Category 1 and would require the implementation of mitigation measures CUL-1 and CUL-2.

Construction of New Production Wells and Monitoring Wells

The DPEIR was prepared at the programmatic level because specific project locations and design elements of the new production and monitoring wells and related facilities, and new pipelines have yet to be finalized. Therefore, impacts to specific historical resources would be speculative. There is a potential for future Project Category 3 projects to adversely affect historic resources within the project area. The potential impact to a historical resource is considered significant. Therefore, during the design phase of any new Project Category 3 project, a Watermaster Party proposing a project shall hire a qualified archeologist to review site/construction plans, conduct a site visit, and determine whether there is a potential for a significant impact to occur. During this study phase, the archaeologist would determine whether monitoring during construction would be required. If the project is located next to an historic building or site, or is located in a designated historic district, an architectural historian may be needed to assess the potential impacts. This would be determined during the cultural resources assessment. Therefore, with implementation of mitigation measures CUL-1 and CUL-2, impacts associated with a future project's effects on an historic or archaeological resource would be less than significant.

The potential to disturb Native American human remains may occur where excavation or trenching activities are proposed. However, should construction activity result in the disturbance of human remains, mitigation measure CUL-3 would be implemented. This requires that the construction contractor stop work in the area and contact the County Coroner.

Mitigation Measures

See Findings and Facts under Section E.2.4, Impact 4.5-1 mitigation measures CUL-1 through CUL-3.

Conclusions: TVMWD finds that implementation of mitigation measures CUL-1 through CUL-3 can reduce potential impacts to historical and archaeological resources pursuant to Section 15064.5, or unknown subsurface historical resources to a less than significant impact level for

Project Category 3 projects. Further, TVMWD finds that with implementation of mitigation measure CUL-3 should human remains be uncovered would reduce that impact to a less than significant level. Mitigation measures CUL-1 through CUL-3 will be integrated into the future development activities without additional impacts on the environment.

Impact 4.5-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5? (Threshold 2)

Findings: Less Than Significant with Mitigation Incorporated

Facts: See Facts under Impact 4.5-1 above.

Mitigation Measures

See Findings and Facts under Section E.2.4 Impact 4.5-1 mitigation measures CUL-1 through CUL-3.

Conclusions: TVMWD finds that implementation of the mitigation measures CUL-1 and CUL-2 can reduce potential impacts to archaeological resources pursuant to Section 15064.5, or unknown subsurface archaeological resources to a less than significant impact level for Project Category 3 projects. The above measures can be implemented without causing additional adverse environmental impacts. Mitigation measures CUL-1 and CUL-2 will be integrated into the future development activities without additional impacts on the environment.

Impact 4.5-3 Disturb any human remains, including those interred outside of formal cemeteries?

Findings: Less Than Significant with Mitigation Incorporated

Facts: See Facts under Impact 4.5-1 above.

Conclusions: TVMWD finds that implementation of mitigation measure CUL-3 would reduce potential impacts to unknown human remains to a less than significant impact level. The Watermaster Party proposing a Project Category 2 project shall comply with provisions of state law regarding discovery of human remains, including PRC Section 5097.98 and Health and Safety Code Section 7050.5. Mitigation measure CUL-3 shall be integrated into the future development activities for Project Category 3 facilities projects without additional impacts on the environment.

Mitigation Measures

See Findings of Fact under Section E.2.4 Impact 4.4-1 for mitigation measure CUL-3.

Impact 4.5-4 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).

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Because the location of new production and monitoring wells, treatment facilities and pipeline interconnects are not known at this time, it is unknown whether historic sites would be affected. Therefore, when new sites have been identified for development, mitigation measure

CUL-1 shall be implemented. If potentially significant resources are encountered during the survey, mitigation measure CUL-2 shall be implemented.

Mitigation Measures

See Findings and Facts under Section E,2.4, Impact 4.5-1 mitigation measures CUL-1 and CUL-2.

Conclusions: TVMWD finds that implementation of mitigation measures CUL-1 and CUL-2 can reduce potential impacts to historical resources, or unknown subsurface historical resources to a less than significant impact level for Project Category 3 projects. These measures can be implemented without causing additional adverse environmental impacts. Mitigation measures CUL-1 and CUL-2 will be integrated into the future development activities without additional impacts on the environment.

Impact 4.4-5 A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: TVMWD completed the requirements for tribal consultation pursuant to Assembly Bill 52 (AB 52) in 2020. Because the DPEIR prepared for the Strategic Plan was programmatic, individual project sites were not assessed for potential site-specific impacts. Therefore, at such time as TVMWD or other Watermaster Party proposes a project, a site-specific Cultural Resources Assessment shall be prepared consisting of a literature search and site survey. In addition, the Watermaster Party or designated project archaeologist for a project shall contact the Native American Heritage Commission (NAHC) who will provide a list of Native American tribes that should be contacted for AB 52 consultation. Individual tribal representatives will determine whether a project warrants consultation.

Mitigation measure CUL-4 shall be implemented prior to approval of a project per the requirements of Public Resources Code Section 21084.3. The intent is to minimize adverse impacts to tribal cultural resources to the satisfaction of the lead agency and the Native American tribe that requested consultation under AB 52.

Mitigation Measures

See Findings and Facts under Section E.2.4, Impact 4.5-4 mitigation measure CUL-4.

Conclusions: TVMWD finds that construction activities may have the potential to affect significant historic-period archaeological resources, tribal cultural resources, and/or human remains; and thus, construction impacts on historical, archaeological, and tribal cultural resources, as well as human remains, could be significant. However, implementation of mitigation measure CUL-1 through CUL-4 would ensure that impacts associated with these impacts would be less than significant during construction.

G.2.5 Environmental Justice

Impact 4.6-1 Result in a disproportionate human health or significant environmental impact on minority and/or low-income populations?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: The Environmental Justice section of the DPEIR focused on a number of environmental issues. Socioeconomic conditions are generally not considered when making a decision regarding the location of a new well, treatment facility or pipeline interconnect route, because the location of groundwater is an independent variable.

Air Quality/Greenhouse Gas Emissions/Global Climate Change

Project Category 3 projects would be developed in optimal locations for groundwater pumping and treating throughout the southerly areas of the Six Basins project area. However, as described in Findings Section G.2.2 above, the LST analysis showed that without mitigation, localized construction emissions would exceed the applicable SCAQMD LSTs for emissions of PM10. However, with implementation of mitigation measures to reduce air emissions during construction of Project Category 3 projects, construction-source emissions would not exceed the applicable SCAQMD LSTs thresholds and would be less-than-significant. Mitigation measure AQ-1 requires compliance with SCAQMD fugitive dust control requirements and mitigation measure AQ-2 requires that off-road diesel construction equipment that also generates particulate matter complies with EPA/CARB Tier 4 emissions standards or equivalent and shall ensure that all construction equipment is tuned and maintained in accordance with the manufacturer's specifications.

Hazards/Hazardous Materials/Wildfire Hazards

<u>Hazards/Hazardous Materials</u>

During construction there is a potential for hazardous materials, substances, or waste to be routinely transported, used, or stored at a site. The use of hazardous materials and substances associated with the development of new wells and treatment facilities would require the implementation of a SWPPP during construction, which would include a list of BMPs to be employed during construction activities to prevent pollutants from entering the storm drain system. In addition, new treatment facilities would require the issuance of a Permit to Construct from SCAQMD. Prior to commencing with operation, a Permit to Operate would also be required for a new treatment facility as set forth in mitigation measure HAZ-1.

It is anticipated that during long-term operation of production wells (and related infrastructure) and water treatment facilities, hazardous materials (e.g., architectural coatings, lubricants, cleaning solutions/chemicals) could be used during the course of normal operations at any Project Category 3 sites, or a future site not yet known. Good housekeeping practices and compliance with applicable laws governing the routine transport, storage, and use of hazardous materials would minimize the potential impacts to the public or environment. Therefore, potential impacts associated with the operation of Project Category 3 projects would be less than significant and no mitigation is required.

Wildfires

The Six Basins project area includes some area within the High Fire Severity Zone (HFSZ), however these areas are located in the upper reaches of the project area along the foothills of the San Gabriel Mountains in more undeveloped areas. Whereas in census tracts where minority or low-income neighborhoods occur, these neighborhoods are located within the urban area of the Six Basins project area, not prone to wildfires.

Hydrology/Water Quality

The location of future wells and treatment facilities with associated pipeline interconnects may be located within census tracts representing minority or low-income populations. Project Category 3 projects are intended to address water quality issues in the Six Basins project area particularly in the Pomona or Ganesha basins by developing additional production wells that interconnect to new or existing treatment facilities in order to increase the reliability and quality of the water supply for all residents. The DPEIR identified a number of mitigation measures that address hydrology and water quality including mitigation measures HWQ-1 to continue groundwater monitoring to identify threats of high groundwater in some areas, the sustainability of groundwater pumping, and threats of lowering of groundwater levels in other areas, mitigation measures HWQ-2 and HWQ-3 to address stormwater quality at site during construction and operation of wells, treatment facilities and pipelines, Therefore, there would be a less than significant impact on Hydrology/Water Quality from proposed Project Category 3 projects, and such projects would not disproportionately affect existing minority or low-income communities in the Six Basins project area during short-term construction or long-term operation.

Transportation

The development of Project Category 3 projects will require the delivery of equipment and materials, and construction worker trips. There may be short-term impacts such as road detours or lane closures associated with equipment and material deliveries. Therefore, regardless of the location of a project, mitigation measures TR-1 through TR-3 have been identified to ensure that impacts can be minimized in the short term. No transportation/traffic impacts associated with the operation/maintenance of Project Category 3 projects as these activities would be intermittent and be limited to one or two vehicles on site.

During operations minimal transportation/traffic impacts associated with the operation/maintenance of Project Category 3 are anticipated. On a daily basis, site inspections involving access for a light duty vehicle would occur. However, at times recharge basins require maintenance which may involve the use of vehicles and equipment similar to those used during construction. At that time, mitigation measures TR-1 through TR-3 would apply to this type of activity. Implementation of these measures would ensure that such activities would not disproportionately affect existing minority or low-income communities in the Six Basins project area during short-term construction or long-term operation.

Mitigation Measures

See Findings and Facts under Section E.2.2, Impact 4.3-1 mitigation measures AQ-1 and AQ-2; Section E.2.7, Impact 4.8-2 mitigation measure HAZ-1; Section E.2.8, Impact 4.9-1 and Impact 4.9-2 mitigation measures HWQ-1 through HWQ-3; and Section E.2.11, Impact 4.14-1 mitigation measures TR-1 through TR-3.

Conclusions: TVMWD finds that implementation of Project Category 3 projects would not disproportionately affect existing minority or low-income communities with implementation of mitigation measures identified for Air Quality, Hazardous Materials, Hydrology and Water Quality, and Emergency Response Planning that would reduce impacts to less than significant levels. TVMWD further finds that development and operation of new wells, treatment facilities and pipelines that interconnect wells and treatment facilities would result in an increase in the availability of treated potable water in the project area and assist with resolving an underlying issue of high groundwater levels that would otherwise have the potential to damage buildings, and during a seismic event, be exposed to liquefaction-related damage without consideration of demographic or socioeconomic factors.

G.2.6 Geology/Soils/Mineral Resources/Paleontological Resources

Impact 4.7-1 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; (ii) Strong seismic ground shaking; (iii) Seismic-related ground failure, including liquefaction' or (iv) Landslides?

Findings: Less than Significant Impact with Mitigation Incorporated

Facts:

Fault Rupture and Strong Seismic Ground Shaking

Improvements to Pomona's P-20 well were evaluated along with similar well rehabilitation projects in Project Category 1.

For new production and monitoring wells that may be located on existing project sites operated by a Watermaster Party, impacts would be similar to those addressed under Project Category 1 projects and subject to the requirements of mitigation measure GEO-1.

For new projects production and monitoring wells that would be located on new sites, should a proposed new Project Category 3 project be located within a designated Alquist-Priolo Fault Zone, the Watermaster Party proposing the project shall consider relocating the project to another site. If that is not feasible, then the project shall be designed in accordance with the most current version of the CBC and subject to a project specific Geotechnical Investigation. See mitigation measures GEO-1 and GEO-2.

Seismic-related Ground Failure Including Liquefaction

Specifically, regarding the new production wells and related treatment facilities, or monitoring wells that are proposed for development in the areas of historically high groundwater there is a

potential for the proposed new facilities to be adversely affected during a seismic event. As discussed under *Fault Rupture and Strong Seismic Ground shaking* above, impacts associated with *Seismic-related Ground Failure Including Liquefaction* can be reduced to a level that is less than significant based on site specific geotechnical investigations required under mitigation measure GEO-2 that would set forth the requirements for site development and long-term operation.

Landslides

Steep slopes in the San Gabriel Mountains and related foothills that delineate the northerly boundary of the Six Basins project area, can be characterized as landslide-susceptible areas. Landslides and mudflow hazards exist on steep hillsides and in the creek and streambed areas such as SASG and TCSG. Though these areas may be susceptible to landslides, there is only one Project Category 3 project identified within the SASG – the pipeline between the Pomona WTP and the new recharge basin. The pipeline would be underground and therefore would minimally affected by such hazards. Therefore, no impacts related to landslides are expected to occur for Project Category 3 projects.

Mitigation Measures

See Findings and Facts under Section E.2.6, Impact 4.7-1 mitigation measures GEO-1 and GEO-2.

Conclusions: TVMWD finds that with implementation of mitigation measures GEO-1 requiring the preparation of a site-specific geotechnical investigation and GEO-2 requiring compliance with CBC requirements and implementation of project-specific engineering design and construction measures, as approved by the respective cities in which Project Category 3 projects would be developed, would avoid the potential for adverse impacts associated with strong seismic ground shaking. TVMWD further finds that the potential for liquefaction to adversely affect groundwater well and treatment facilities can be minimized through the management of groundwater levels in areas of known high groundwater levels.

Impact 4.7-2 Result in substantial soil erosion or the loss of topsoil?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Construction activities for proposed Project Category 3 projects such as excavation and grading may result in soil erosion during rain or high wind events. Such construction activities must comply with SCAQMD Rule 403 for dust control that would ensure the prevention and/or management of wind erosion and subsequent topsoil loss. Compliance with SCAQMD Rule 403 (mitigation measure AQ-1) would ensure that construction activities that could cause wind related soil erosion are reduced to less than significant levels and no additional mitigation measures have been identified.

To prevent soil erosion associated with stormwater runoff from construction sites that are one-acre or larger in size, construction contractors at each site would be required to prepare and implement a SWPPP in accordance with the requirements of the Statewide Construction General Permit (SWRCB Water Quality Order 2009-0009-DWQ). A SWPPP identifies BMPs to control erosion, sedimentation, and hazardous materials potentially released from construction sites into surface waters. Compliance with the Construction General Permit, site-specific SWPPP, and

identified BMPs would ensure soil erosion and loss of topsoil impacts can be reduced to less than significant levels at each construction site.

For sites that are less than one-acre in size, the Statewide Construction General Permit does not apply. However, a construction contractor is still required to comply with minimum BMPs, as specified by the Municipal Separate Storm Sewer System (MS4) permit for each county. Each of the cities within the counties of Los Angeles and San Bernardino are co-permittees to the respective county MS4 permits. Each city has a list of minimum BMPs that must be employed to control runoff from construction sites. Watermaster Parties proposing construction projects must comply with these requirements and ensure that their respective construction contractors are implementing the required BMPs during all construction activities. Therefore, with compliance with the Statewide Construction General Permit and/or requirements under MS4 for the control of stormwater runoff from construction sites, this impact would be less than significant, and no mitigation measures are required. The requirement for implementation of BMPs is set forth in mitigation measures HWQ-2.

Post construction of Project Category 3 projects would also be subject to MS4 requirements related to the control of on-site hydrology during storm events. All sites must retain stormwater flows on site and treat stormwater in accordance with an approved Water Quality Management Plan (WQMP) that incorporates Low Impact Development (LID) BMPs.

Mitigation Measures

See Findings of Fact under Section E.2.2, Impact 4.3-1 mitigation measure AQ-1, and Section E.2.8, Impact 4.9-2 mitigation measure HWQ-2.

Conclusions: TVMWD finds that with implementation of mitigation measure AQ-1 for the control of fugitive dust during construction, and with implementation mitigation measure HWQ-2 for a project-specific SWPPP or Drainage Plan during construction, the potential for substantial soil erosion or the loss of topsoil to occur during construction or operation of facilities at Project Category 3 project sites would be less than significant.

Impact 4.7-3 Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Construction of new production/monitoring wells, or the construction/operation of new pipeline interconnects would not cause subsidence, settlement, lateral spreading, slope failure including landslides. However, where these types of unstable conditions may occur, existing and proposed facilities could be adversely affected. There is potential for damage to facilities on site to occur, however, because there are no employees associated with these projects (except for site inspections and periodic maintenance activities), impacts associated with unstable soil conditions on humans would be minimal. Mitigation measure GEO-2 would still apply to projects that may be undertaken in areas susceptible to non-seismically induced geologic hazards. With implementation of GEO-2, this impact can be reduced to a less than significant level.

Regarding groundwater pumping at new wells to lower the groundwater table and potentially result in subsidence, the Watermaster conducts on-going groundwater monitoring and with the addition of new monitoring wells, more precise monitoring of groundwater conditions in the Six Basins project area can be accomplished and control of groundwater levels would be achieved resulting in a less than significant impact.

Mitigation Measures

See Findings and Facts under Section E.2.6, Impact 4.7-1 mitigation measure GEO-2.

Conclusions: TVMWD finds that with implementation of mitigation measure GEO-2 requiring the preparation of a design-level geotechnical investigation to identify potential geologic hazards including unstable soils that may be located on a Project Category 3 project site. Further, TVMWD finds that recommendations from the geotechnical investigation for site-specific design criteria to mitigate for seismic and non-seismic hazards, would ensure that this impact would be less than significant.

Impact 4.7-4 Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: The soils in the Six Basins project area are predominantly alluvial material within the valley area on top of bedrock. Underlying soils are well drained to excessively drained sands, loams, and gravelly sands typical of alluvial material, down to bedrock. In the SASG, where the mine pits are located, soils (sediments) are a combination of sands, loams, gravels and larger cobbles and boulders.

There are some locations within the project area that contain clay loams to sandy clay loams that have the highest shrink/swell potential. These tend to be fill materials transported during construction to sites from other locations and are not indigenous to the area. Should any of the future project sites, not specifically identified in the Strategic Plan contain such fill material, there is a potential for subsidence, lateral spreading or other non-seismically induced geologic hazards associated with expansive soils. Typical construction techniques to address expansive soils if they are encountered on a project site is to remove the material and replace with a more suitable soil; or over excavate and recompact in place. The particular technique would be identified in a project's geotechnical investigation as identified in mitigation measure GEO-1. Therefore, if expansive soils are encountered on a project site, they can be mitigated to a less than significant level with implementation of mitigation measure GEO-1.

Mitigation Measures

See Findings of Fact under Section E.2.6, Impact 4.7-1 mitigation measure GEO-1.

Conclusions: TVMWD finds that with implementation of mitigation measure GEO-1 requiring the preparation of a design-level geotechnical investigation to identify potential geologic hazards including expansive soils that may be located on a project site. The geotechnical investigation shall recommend site-specific design criteria to mitigate for seismic and non-seismic hazards, such as special foundations and structural setbacks, and these recommendations shall be incorporated

into the design of individual projects. Therefore, with mitigation, this impact would be less than significant.

Paleontological Resources

Impact 4.7-6 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Because the EIR evaluates the Strategic Plan and related projects at a programmatic level, specific project design elements have not been finalized. However, as project construction is undertaken, excavation at some sites may be required; including Project Category 3 projects where new treatment facilities may be constructed. Therefore, mitigation measure GEO-3 was identified and will apply to all projects that require excavation at depths greater than three feet, a qualified paleontologist must be retained to determine if a study of the project area for paleontological resources should be undertaken. If the paleontologist determines this to be the case, he/she will conduct a paleontological resources assessment designed to identify potentially significant resources. The assessment would consist of: (1) a paleontological resource records search to be conducted at the Los Angeles County Natural History Museum and/or other appropriate facilities; (2) a field survey or monitoring during excavation (or both) if deemed appropriate by the paleontologist; and (3) recordation of all identified paleontological resources.

Mitigation Measures

See Findings of Fact under Section E.2.6, Impact 4.7-6 mitigation measure GEO-3.

Conclusions: TVMWD finds that excavation at project sites to depths of three feet or greater may reveal unknown paleontological resources. Where a project requires excavation, mitigation measure GEO-3 shall be implemented which requires that a qualified paleontologist shall be retained to determine if on-site monitoring is required, and if resources are recovered during monitoring, that they be recorded. Therefore, the potential impacts to unknown paleontological resources would be less than significant.

G.2.7 Hazards and Hazardous Materials/Airport Safety/Wildfire Hazards

Impact 4.8-1 Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials); and 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?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts:

Construction

Construction activities associated with development and operation of new production or monitoring wells include drilling, trenching, excavation or other ground disturbing activities to develop a well site and, for production wells, related pipelines to interconnect with existing or

new treatment facilities. Construction activities would require the transport, use, and disposal of hazardous materials including gasoline, diesel fuel, hydraulic fluids, and other similarly related materials generally in support of heavy equipment (e.g., drilling rig, dozer, paver) operation. In addition, other materials such as paints, adhesives, solvents, and other substances typically used in construction may also be used on-site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction projects, and there would be no greater risk associated with new well for improper handling, transportation, or spills associated with the project than would occur on any other similar well construction site. As such, Construction contractors employed by the Six Basins Watermaster Party responsible for the development of a Project Category 3 project would be required to comply with all applicable federal, State, and local laws and regulations pertaining to the transport, use, disposal and storage of hazardous construction-related materials or waste during construction. These include but are not limited to requirements imposed by the US Environmental Protection Agency (EPA), the State Department of Toxic Substances Control (DTSC) and State Water Resources Control Board (SWRCB), and the Santa Ana or Los Angeles Regional Water Quality Control Boards (Regional Boards).

Development of a new well will typically require equipment including a drilling rig, pipe truck, driller's trailer (doghouse), and settling tanks for the water (or approved drilling fluid) used as the circulating medium in the drilling process. The discharge water is piped to holding tanks on site where the suspended sediments (sand and silt) are allowed to settle to the bottom. After testing to verify the clarity and quality of the water, the water can be released either into an on-site basin, or discharged into the storm drain system, pending approval of release by the local agency. Development of new wells will require a permit under the State's Dewatering General Permit as set forth in mitigation measure HWQ-4.

Construction activities at Project Category 3 sites would also be required to implement a SWPPP for a project site where one-acre or greater will be disturbed, or if less than one-acre a Drainage Plan. For either plan, the construction contractor is required to include a list of Best Management Practices (BMPs) to be employed during all phases of construction as set forth in mitigation measures HWQ-2 HWQ-3 identified in Findings of Fact Section E.2.8, *Hydrology and Water Quality*. Implementation of this measure would ensure that in case of a hazardous materials spill, such material (pollutant) would not mix with stormwater or construction water and enter the storm drain system. Mitigation measure HWQ-3 would also apply to long-term operation of a site.

Operation

Operation of production and monitoring wells or the conveyance of water to treatment plants would not require the use of acutely hazardous materials. Hazardous materials that may be utilized include diesel fuel (if a backup generator is proposed at a site), lubricants and solvents typically associated with the maintenance of well pumps. All materials would be routinely transported, used, and disposed of in accordance with any applicable laws, regulations, and protocols that protect the environment, the public, and workers. The Watermaster Parties who would be developing and operating Project Category 3 projects all have plans in place to address accidents such as spills. For example, Three Valleys Municipal Water District currently has a Spill Prevention Control and Countermeasures Plan (SPCC), which helps to minimize occurrences and effects of hazardous or toxic spills and leaks during water treatment activities. Under this category of projects, new production wells, and the existing P-20 well site, would be connected

via new pipeline, to existing pipelines conveying untreated water to treatment plants. Once a new well site is constructed, the Watermaster Party responsible for that well would update the SPCC to include a site-specific plan for each well. Compliance with all applicable laws and regulations would reduce the potential impact associated with the routine transport, use, storage, or disposal of hazardous materials to a less than significant level.

In addition, a site may include a backup diesel generator for emergency use only. This would require a permit from SCAQMD to construct/operate the generator. Mitigation measure HAZ-1 identified in Section E.2.7 requires a Watermaster Party responsible for a project site where treatment facilities are located, or a backup generator is on-site obtain a permit to construct/operate from SCAQMD.

Mitigation Measures

See Findings and Facts under Section E.2.7, Impact 4.8-1 mitigation measure HAZ-1; Section E.2.8, Impact 4.9-2 mitigation measures HWQ-2 and HWQ-3; and Section E.2.8, Impact 4.9-4 mitigation measure HWQ-4.

Conclusions: TVMWD finds that with implementation of mitigation measure HAZ-1 for SCAQMD permits, mitigation measures HWQ-2 and HWQ-3 for the use of BMPs during construction and/or operation, and mitigation measure HWQ-4 where dewatering is required, impacts associated with Project Category 3 impacts associated would be less than significant.

Impact 4.8-2 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: The P-20 well site is located approximately 0.08 mile southwest of Claremont High School. In addition to the rehabilitation of the existing well, a new treatment plant to reduce nitrate concentrations in the produced water could be developed. The alternative is to construct a pipeline to connect to the TVMWD treatment facility. However, it is unknown at this time which alternative will be implemented. As part of this project, the City of Pomona, the Watermaster Party proposing the project is required to obtain all required permits from the State Department of Water Resources and State Department of Public Health for new or rehabilitated wells. In addition, if a new treatment facility is developed, mitigation measure HAZ-1 requires that prior to construction of a new treatment facility, or the rehabilitation/upgrade of existing treatment facilities, the Watermaster Party proposing new facilities to obtain a Permit to Construct from SCAQMD. Once completed, the Watermaster Party must apply for a Permit to Operate. Implementation of this measure will ensure that operation of new or rehabilitated treatments facilities will result in less than significant impacts to the environment.

Sites of future production and/or monitoring wells are unknown at this time, as are the potential pipeline routes. Under this category of projects, it is possible that contaminated soils could be inadvertently encountered during well development and development of related treatment facilities, and pipeline construction, thereby posing a potential threat to construction workers, the public and the environment. Therefore, mitigation measure HAZ-3 is required. This measure requires the Watermaster Party undertaking a project to conduct a Phase I Environmental Site Assessment (ESA) to determine the presence/absence of soil and/or groundwater contamination

at or in the vicinity of a project site. If the Phase I ESA finds the potential for hazardous concentrations of contaminated soil or groundwater to occur within the project site, a Phase II ESA shall be completed before construction begins. A Phase II ESA would include soil and/or groundwater sampling and analysis for anticipated contaminants. Such sampling is intended to identify how contaminated soil and/or groundwater shall be disposed of, and to determine if construction workers would need special personal protective gear and/or equipment. The results of the Phase II would determine if remediation is required, which must be completed prior to commencing with any ground disturbing activities.

Mitigation Measures

HAZ-3 Prior to the commencement of any construction that would require ground-disturbing activities, a project proponent shall undertake a Phase I Environmental Site Assessments (ESA) to determine the presence/absence of soil and/or groundwater contamination at or in the vicinity of a project site. Recommendations identified in the ESA shall be implemented to the satisfaction of applicable agencies prior to and during construction. If the Phase I ESA finds the potential for hazardous concentrations of contaminated soil or groundwater to occur within the project site, a Phase II ESA shall be completed before construction begins.

If the Phase II ESA determines that the site has contaminated soil and/or groundwater, a Soil and Groundwater Management Plan that specifies the method for handling and disposing of contaminated soil and groundwater prior to demolition, excavation, and construction activities shall be prepared and implemented. A Phase II ESA shall include soil and/or groundwater sampling and analysis for anticipated contaminants. Such sampling is intended to identify how contaminated soil and/or groundwater shall be disposed of, and to determine if construction workers would need special personal protective gear and/or equipment.

Conclusions: TVMWD finds that with implementation of mitigation measure HAZ-3 for the completion of an environmental site assessment impacts associated with Project Category 3 impacts associated would be less than significant.

Impact 4.8-3 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?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: The analysis of Hazards and Hazardous materials included a records search on the SWRCB GeoTracker and the DTSC EnviroStor databases. Although, none of the projects identified in the Strategic Plan were found in these databases, there were numerous sites within the Six Basins project area that were found. Sites of future production and/or monitoring wells are unknown at this time, as are the potential pipeline routes. Under this category of projects, it is possible that contaminated soils could be inadvertently encountered during well development and pipeline construction, thereby posing a potential threat to construction workers, the public and the environment.

Mitigation measure HAZ 3 requires the preparation of a Phase I Environmental Site Assessment (ESA) unless the Watermaster Party proposing a Project Category 3 project can show that a proposed site does not contain contaminated soil. When a Phase I ESA is conducted and, if findings are positive for soil contamination, a Phase II ESA that sets forth a plan for handling and disposing of contaminated soil and/or groundwater. Therefore, with implementation of mitigation measure HAZ-3, impacts associated with contaminated soil during construction, can be reduced to a less than significant level.

Mitigation Measures

See Facts and Findings under Section E.2. 7, Impact 4.8-3 mitigation measure HAZ-3.

Conclusions: TVMWD finds that with implementation of mitigation measure HAZ-3 for the completion of an environmental site assessment impacts associated with Project Category 3 impacts associated would be less than significant.

Wildfire

Impact 4.8-5 Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?

Findings: Less Than Significant with Mitigation Incorporated

Facts: It is unknown at this time where new production and/or monitoring wells would be constructed. Likewise, because the specific location of any of these wells is unknown, the specific route of new pipelines and interconnects is also unknown. However, what is known is that the intent of additional production and monitoring wells is to monitor and control high groundwater problems generally known in the southern portion of the Upper Claremont Heights Basin, the Lower Claremont Heights Basin, and the Pomona Basin and to increase the reliability of local water resources in the future; by systematically drawing from groundwater production wells. These basins underly a largely urbanized area so that exposure to wildland fires would be minimal. However, for future wells that may be developed in the upper reaches of the Upper Claremont Heights basin, exposure to wildland fires is a possibility. Likewise, at such time as the pipeline to connect the Pomona WRP to the new SASG recharge basin, construction activities in the SASG to connect the pipeline to the recharge basin would be subject to implementation of mitigation measures HAZ-5 that requires the preparation and implementation of a fire management plan.

None of the production and/or monitoring wells or treatment facilities include a residential component or provide a location for employees to work. The only habitable structure that may be located at one or more of the Project Category 3 sites are pump houses or small storage structures, that would only be occupied intermittently during routine maintenance of the wells and/or treatment facilities. Therefore, people would not be directly or indirectly exposed to injury or death involving a wildland fire. However, Watermaster Parties that may propose well sites within Fire Hazard Severity Zones would be required to meet the site development standards set forth by the State and local cities for routine clearance of vegetation (fuel) to reduce the potential for the spread of wildfires. Therefore, compliance with applicable development standards for sites in Fire Hazard Severity Zones as set forth in mitigation measures HAZ-5 and HAZ-6, this impact would be less than significant.

Mitigation Measures

See Findings and Facts under Section F.2.7, Impact 4.8-5 mitigation measures HAZ-5 and HAZ-6.

Conclusions: TVMWD finds that with implementation of mitigation measures HAZ-5 and HAZ-6, impacts associated with wildfires at Project Category 3 project sites can be reduced to less than significant levels.

Impact 4.8-6 Substantially impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts:

Construction

Construction of new wells and treatment facilities, and pipeline interconnects between new or existing facilities would not impair implementation of or physically interfere with adopted emergency response plans or emergency evacuation plans with the implementation of mitigation measures TR-1 through TR-3 that require the implementation of a Construction Traffic Management Plan during construction, or in the future if maintenance of these facilities requires road detours. During construction, haul trucks would be used to transport construction material to the site and remove any construction materials associated with well or treatment facility rehabilitation or construction. This is considered to be a short-term or intermittent impact and only when a haul truck is transporting material to the site; or accessing/leaving a site. If construction would impact a road, the Watermaster Party proposing a project would be required to develop and implement a Construction Traffic Management Plan prior to initiating new construction, or construction association with rehabilitation of wells. Such a plan shall be consistent with the appropriate city or county Emergency Response Plan as set forth in mitigation measures TR-1 through TR-3. Implementation of a Construction Traffic Management Plan would ensure that impacts associated with the interruption of traffic would be less than significant.

Operation

Operation of the proposed facilities in this category of projects would not impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. The projects consist of operation of production and/or monitoring wells, and the operation of pipelines that interconnect wells and treatment facilities. Routine inspections of these facilities could be daily with maintenance being intermittent; and would require minimal trips that would not significantly impact the roadway network. Therefore, impacts to an adopted emergency plan would be less than significant during long-term operation.

Mitigation Measures

See Findings and Facts under Section E.2.11, Impact 4.14-1 mitigation measures TR-1 through TR-3.

Conclusions: TVMWD finds that implementation of mitigation measures TR-1 through TR-3 during construction and/or maintenance of Project Category 3 facilities would ensure that

construction activities requiring street closures would not disproportionately affect existing minority or low-income communities in the Six Basins project area during short-term construction or long-term operation.

Impact 4.8-7 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 wildfire?

Findings: Less Than Significant with Mitigation Incorporated

Facts:

Construction

Future sites of the proposed new production or monitoring wells, or new treatment facilities are not known at this time. However, some new wells could be developed in the Upper Claremont Heights Basin or the Canyon Basin, the upper parts of these basins being located within the High Fire Severity Zone. This is a potentially significant impact. For future well development projects that may be located in a High Fire Severity Zone, or otherwise are within an area where the combination of steep slopes and vegetation may increase the risk of fire when combined with high winds and a source of ignition, mitigation measure HAZ-5 shall be implemented. Implementation of a Fire Management Plan that describes how the site would be managed during construction regarding the clearing of vegetation/fuel in the area of development, equipment, staging areas, welding areas, or other areas slated for development that are planned to use park producing equipment during construction. Implementation of mitigation measure HAZ-5 during construction will ensure that this impact is less than significant.

Likewise, although proposed pipelines and ancillary facilities (e.g., lift stations) would be constructed primarily within paved roadway rights-of-way and on disturbed open space (road shoulders), pipelines to connect new production wells to treatment facilities, or the proposed recycled water pipeline between the Pomona WRP and the SASG, creates a potential for facilities to be located within or near wildland areas with high fire risk. The use of spark-producing construction equipment or machinery within a fire risk area could create hazardous fire conditions and expose construction workers to wildfire risks. This is a potentially significant impact that can be reduced to a less than significant level with the implementation of a fire management plan as set forth in mitigation measure HAZ-5. With implementation of mitigation measure HAZ-5, the impact is less than significant.

Operation

Once new wells and pipelines are in place, mitigation measure HAZ-6 requires the development and implementation of a Fire Management Plan for operations. Such a plan would outline how the Watermaster Party operating the site would control vegetation/fuel on site to reduce the potential for wildfires to damage the facilities, or the potential for a wildfire to cross through the facilities and impact nearby residential neighborhoods, if such neighborhoods are in proximity to a Project Category 3 site. Maintenance would be limited to periodic inspections and housekeeping activities (maintenance of facilities). These activities are not anticipated to cause a fire risk as maintenance activities (pump and treatment facility testing and maintenance, landscape maintenance). However, should such activities require the use of equipment that could cause sparking or otherwise have the potential to start a fire, implementation of a Fire Management

Plan as set forth in mitigation measures HAZ-6 would be required to ensure that this impact is less than significant. This would be considered by the Watermaster Party responsible for individual projects, on a project-by-project basis, to ensure that impacts would be less than significant.

Mitigation Measures

See Findings and Facts under Section F.2.7, Impact 4.4-7 mitigation measures HAZ-5 and HAZ-6.

Conclusions: TVMWD finds that with implementation of mitigation measures HAZ-5 and HAZ-6, impacts associated with wildfires at Project Category 3 project sites in a High Fire Severity Zone can be reduced to less than significant levels.

Impact 4.8-8 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?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts:

Construction and Operation

Production and Monitoring Wells

As discussed previously, the location of new production and monitoring wells is unknown at this time. However, the Strategic Plan states that new wells could be constructed in the Upper Claremont Heights Basin that includes portions of the SASG, and an area along Padua Avenue above the 210 Freeway. The area that overlies the Upper Claremont Heights Basin is relatively built out with urban uses (mainly residential), except for the upper reaches of the basin so that roads and utilities already exist. Therefore, the construction and operation of new production wells in the Upper Claremont Heights Basin would not 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.

Pipelines and Interconnects

Pipelines and interconnects would be developed as new production wells are developed, or where existing wells may be connected to water treatment facilities such as the City of Pomona's P-20 well site in Lower Claremont Heights Basin that may be connected via pipeline to the TVMWD Miramar WTP and would be constructed along existing roads in the City of Claremont. Therefore, new pipelines and interconnects would not 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.

The new pipeline proposed to connect the Pomona WRP to the new SASG recharge basin would generally be constructed in existing roadways through urban areas with the exception of the pipeline and interconnection as it enters the SASG. Similar to the road grading in the SASG discussed immediately above, there is a potentially significant impact for fire risk that can be

reduced to a less than significant level with the implementation of a fire management plan as set forth in mitigation measures HAZ-5 and HAZ-6. With implementation of mitigation measures HAZ-5 and HAZ-6, the construction and operation of the new recycled water pipeline into the SASG would not exacerbate fire risk or result in temporary or ongoing impacts to the environment regarding increased risk of fire.

Mitigation Measures

See Findings and Facts under Section F.2.7, Impact 4.4-7 mitigation measures HAZ-5 and HAZ-6.

Conclusions: TVMWD finds that with implementation of mitigation measures HAZ-5 and HAZ-6, impacts associated with wildfires at Project Category 3 project sites in a High Fire Severity Zone that would require the development of new roads or firebreaks can be reduced to less than significant levels.

G.2.8 Hydrology and Water Quality

Impact 4.9-1 Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Findings: Less Than Significant Impact. With Mitigation Incorporated

Facts: During long term operation of Project Category 1 projects to pump and treat groundwater in the southern reaches of the Six Basins, and *Water Recharge* projects to enhance stormwater and supplemental water recharge in new basins in the SASG and TCSG, enlarge the existing recharge basins in the PSG, and create a new groundwater infiltration gallery at the Fairplex site, Watermaster Parties (e.g., City of Pomona, GSWC) would also be implementing Project Category 3 projects including new production wells, new monitoring wells, and new pipeline interconnects between production wells and existing or new treatment plants, and between the Pomona WRP (recycled water) and the new SASG site. The intent is to plan for the capture of surplus stormwater during wet periods, which can enable in-lieu recharge of the Pomona Basin so that groundwater is more available during dry periods.

Similar to Project Category 1 projects, to ensure that impact associated with increased groundwater extraction in the Six Basins project area would be less than significant, the Watermaster Parties operating existing production wells, or developing future production wells in the Pomona Basin and UCHB shall implement mitigation measure HWQ-1 that requires groundwater modeling to be conducted prior to upgrading existing wells or developing new wells.

In concert with proposed Project Category 1 projects that would allow Parties to "put" water into storage during wet years, and produce or "take" the stored water when imported water supplies are reduced due to drought or otherwise not available (Project Category 1), and water recharge projects to enhance stormwater and supplemental water recharge in new or expanded recharge basins or an underground infiltration gallery (Water Recharge), implementation of Project Category 3 projects to rehabilitate Pomona's P-20 site (including constructing an interconnect between the P-20 site and TVMWD's Miramar WTP), the development of new production wells interconnected to a new treatment facility the development of an interconnect between the Pomona WRP (recycled water) and the new recharge basin at the SASG, and the development of new monitoring wells in an area of historically high groundwater levels, would

not result in a substantial decrease in groundwater supplies or interfere substantially with groundwater recharge such that these projects would impede sustainable groundwater management of the basin.

Increasing the groundwater extraction in existing production wells (Project Category 1), in conjunction with the development of new production wells (Project Category 3) could exclude this water source from migrating to the adjacent Chino Basin resulting in the loss of this water source in that basin. However, the loss is likely to amount to a relatively small percentage of the total groundwater within the Chino Basin; resulting in no significant impact associated with the depletion of groundwater levels. To ensure that this impact would be less than significant, the Watermaster Parties operating existing production wells, or developing future production wells shall implement mitigation measure HWQ-1 that requires groundwater modeling to be conducted prior to upgrading existing wells or developing new wells. Work this into the discussion and add MM HWQ-1

Mitigation Measures

See Findings and Facts under Section E.2.8, Impact 4.9-1 mitigation measure HWQ-1.

Conclusions: TVMWD finds that implementation of Project Category 3 projects in conjunction with implementation of other Strategic Plan projects, would not impede sustainable groundwater management of the basin by substantially decreasing groundwater supplies or interfering with groundwater recharge. Further, TVMWD finds that under future conditions, the information developed from monitoring programs will be used to develop operating strategies and requirements for Strategic Plan projects to mitigate for these potential impacts associated with ongoing implementation of the Strategic Plan.

Impact 4.9-2 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 onsite or offsite; ii). substantially increase the rate or amount of surface water runoff in a manner which would result in flooding on or offsite; iii) create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv) impede or redirect flood flows?

Findings: Less Than Significant with Mitigation Incorporated

Facts: The four potentially significant impacts are all related to drainage of a site or area that may result in runoff that could exceed capacity and thus cause erosion, siltation, flooding, contribute to polluted runoff, or redirect flows.

Construction

The rehabilitation of the P-20 well head would have similar impacts as Project Category 1 projects and be subject to the implementation of mitigation measures HWQ-2 and HWQ-3 to ensure that potential impacts on drainage patterns at each site would be reduced to less than significant levels.

The development of new groundwater production and monitoring wells has the potential to cause substantial erosion or siltation on or offsite, during construction. These projects may require vegetation removal and grading to prepare a site, excavation for new pipeline interconnects (production wells) and may require temporary stockpiling of soil during trenching activities. These projects would also require drilling and treatment of the water used in the drilling process. Areas on a site where soil is exposed either from grading or stockpiling, create opportunities for erosion (wind or water) and siltation (water) to occur. It is unknown how large any of the new well sites would be however some may be one acre or greater. For these sites, mitigation measure HWQ-2 shall be implemented during construction activities at each site. This measure requires that prior to the commencement of construction, a Watermaster Party or its construction contractor shall prepare a SWPPP (if the area of disturbance of one acre or greater). For sites smaller than one acre, implementation of a set of BMPs to be identified prior to ground disturbance would still be required in compliance with the LA County MS4 Permit requirements as set forth in mitigation measure HWQ-2.

In addition, the *Air Quality Impact Analysis* (Appendix B.1) identified the need to comply with the SCAQMD requirements to implement Best Available Control Measures (BACM) for the control of fugitive dust wind erosion), especially during Santa Ana wind conditions. This requirement is set forth in mitigation measures AQ-1 through AQ-3.

The construction of interconnections (underground pipelines) between new production wells and the new treatment facility, between the Pomona WRP and the new SASG site, and between the P-20 well site and TVMWD's WTP has been estimated to total 85,000 linear feet (approximately 16 miles). Such interconnections would be developed for Project Category 3 between new wells and a proposed new treatment plant (up to 3,000 linear feet), projects such as the interconnect between Pomona's P-20 well site and the TVMWD Miramar WTP in order to blend treated water with the groundwater pumped from the well (approximately 1,000 to 10,000 feet); and a Recycled Water Recharge interconnect between the Pomona WRP and the new recharge basin at the SASG. Construction of new interconnects would be subject to both NPDES and SCAQMD requirements for the control of erosion at a project site. Therefore, these projects shall be constructed using BMPs set for in a project specific SWPPP (mitigation measure HWQ-2), and BACM as required by SCAQMD for the control of fugitive dust (mitigation measure AQ-3). Mitigation measure AQ-3 requires compliance with SCAQMD Rule 403. The MMRP prepared for each category of projects includes a copy of Rule 403 Table 1 – a list of BACM for construction activities. With implementation of mitigation measures, impacts associated with construction activities would be less than significant.

Regarding a proposed Project Category 3 project resulting in an impediment to or the redirection of flood flows during construction or operation, the area overlying the Pomona Basin where most of these projects would be implemented, is highly urbanized with an existing storm drain network that ties into a regional system. Under future conditions, in order to maintain each site in compliance with the requirements of the County's MS4 Permit, for the retention of storm flows on site to control stormwater runoff, a Drainage Plan as set forth in mitigation measure HWQ-3 shall be implemented at each Project Category 3 project site. With implementation of mitigation measure HWQ-3, impacts associated with operation activities would be less than significant.

Mitigation Measures

See Findings and Facts under Section E.2.2, Impact 4.3-1 mitigation measures AQ-1 through AQ-3, and Section E.2.8, Impact 4.9-2 mitigation measures HWQ- 2 and HWQ-3.

Conclusions: TVMWD finds that construction/operation of Project Category 3 projects would not substantially alter the existing drainage pattern of the site or area through the addition of impervious surfaces that would result in increased erosion or siltation, an increase in the rate or amount of surface runoff, exceed the capacity of a stormwater drainage system, or impede or redirect flood flows with implementation of mitigation measures HWQ-2, HWQ-3, and AQ-1 through AQ-3.

Impact 4.9-3 In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Most of the proposed Project Category 3 project sites would be located in urban areas within the cities of Pomona, La Verne and Claremont which are located approximately 35 miles north and northeast of the Pacific Ocean. In addition, none of the project sites are located adjacent to any large standing water bodies that could experience a seiche.

Flood Hazards

Flooding in the Six Basins project area has been largely controlled over time, by the development of local and regional facilities for the capture, control, and release of stormwater in the recharge basins in the LOSG, SASG, and TCSG. Flows that are not captured are diverted into concrete lined channels and conveyed to the San Gabriel River or the Santa Ana River. The Watermaster Parties, particularly PVPA and SAWCo have over 100 years of experience addressing storm flows in the project area. In addition, the entire Six Basins project area is located in an Area of Minimal Flooding, based on FIRM data provided by FEMA. Therefore, the possibility of Project Category 3 project sites being flooded due to an issue with one or both dams would be remote and is considered to be less than significant.

Release of Pollutants During Construction

Project Category 3 project sites would likely all be located in urban areas where storm drain infrastructure is in place. Construction of proposed improvements at these sites may require ground disturbance that could alter a site's drainage patterns. Compliance with the requirements of a site-specific SWPPP, or for smaller sites not subject to SWPPP requirements, compliance with the County's MS4 permit for the control of stormwater, would require the implementation of BMPs that manage site runoff from construction sites.

Construction activities could result in changes to existing drainage patterns at a site including new drainage outlets to the storm drain. With implementation of such BMPs and compliance with conditions of required permits governing storm water runoff from construction sites, potential onsite and offsite flooding impacts would be reduced to less than significant levels and discharges from construction sites would not exceed the capacity of existing storm water drainage systems. Erosion or siltation from construction sites would also be minimized by the use of "good housekeeping" BMPs. Mitigation measure HWQ-2 for the implementation of a SWPPP or a site-

specific set of BMPs for the control of stormwater runoff on sites less that one acre, would ensure that this impact would be less than significant.

Release of Pollutants During Operation

Each Watermaster Party is responsible for controlling stormwater runoff from a project site. Mitigation measure HWQ-3 requires a Watermaster Party to implement a drainage plan that includes design features to reduce stormwater peak concentration flows exiting a site to reduce impacts on downstream flows from its site. Implementation of mitigation measure HWQ-3 would ensure that stormwater flows from project sites are controlled on-site and released is such as manner as to prevent flooding and ensure that this impact would be less than significant.

Mitigation Measures

See Findings and Facts under Section E.2.8, Impact 4.9-2 mitigation measures HWQ- 2 and HWQ-3.

Conclusions: TVMWD finds that construction/operation of Project Category 3 projects would not substantially alter the existing drainage pattern of the site or area through the addition of impervious surfaces that would result in increased erosion or siltation, an increase in the rate or amount of surface runoff, exceed the capacity of a stormwater drainage system, or impede or redirect flood flows with implementation of mitigation measures HWQ-2 and HWQ-3.

Impact 4.9-4 Violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or ground water quality?

Findings: Less Than Significant with Mitigation Incorporated

Facts:

Construction

The rehabilitation of Pomona's P-20 well is similar in characteristic to Project Category 1 projects.

<u>New Production and Monitoring Wells</u>

Equipment likely to be used in the drilling process would consist of a drilling rig, pipe truck, driller's trailer (doghouse), and settling tanks for the discharge water. Drilling a new well would require the use of a fluid, either water or other approved drilling fluid as the circulating medium. TVMWD's Mirigrand well project was used as an example of the development of a new well site.

A minimum of two 20,000-gallon discharge water settling tanks would be used for clarification of water prior to discharge; and would be removed upon completion of construction. Although settling times will vary depending on the nature of suspended particles in the discharge water (e.g., fine-grained sand and silt require more time to settle), previous drilling projects in the area (TVMWD's Grand Avenue well site developed in 2020) showed that two tanks were adequate to clarify water such that the suspended sediment in the discharge meets regulatory criteria of 100 Nephelometric Turbidity Units (NTU) total suspended solids. The NTU measurement is based on the cloudiness of the water and is one of the tests used to evaluate water quality. If the drilling process requires the use of an approved drilling fluid as the circulation medium, liquid (water or

drilling fluid) generated from well development and pumping tests may require that the water be hauled off site to an approved disposal site. Otherwise, a temporary pipeline between a well site to an existing storm drain could be constructed, for a controlled release into the system. If the site is large enough, a retention basin could be developed to release the water for percolation into the groundwater.

During the design phase of a new production or monitoring well, an Initial Study would be conducted to determine if additional environmental review in the form of a subsequent Mitigated Negative Declaration or Subsequent EIR is required.

New Interconnects

New interconnects consist of new underground pipelines to interconnect new production wells with a new treatment facility or to existing treatment facilities. An example of the latter is the proposed interconnect between the P-20 well site and the TVMWD Miramar WTP. Another interconnect is proposed between the Pomona WRP and the new SASG recharge basin. In total, the Strategic Plan estimates up to 85,000 linear feet of new pipeline would be constructed. These are considered to be typical pipeline projects that would include trenching, stockpiling of soil, placement of new pipe, backfilling and repaving. Each Watermaster Party or its construction contractor will be responsible compliance with the BMPs set forth in project specific SWPPPs as described in mitigation measure HWQ-2. For the purposes of this analysis and the urbanized nature of the Strategic Plan project area, it was assumed that most of the pipeline construction would occur within existing streets, and that once completed, all facilities would be underground. Therefore, no impacts on surface or groundwater quality associated with the operation of these pipelines were identified.

Finally, should any of the proposed Project Category 3 projects require dewatering during construction, they would also be subject to the requirements of the Groundwater Dewatering Permit. Mitigation measure HWQ-4 shall be implemented prior to commencement of well rehabilitation activities that involve dewatering or other water discharge. Implementation of mitigation measures HWQ-2 through HWQ-4, will ensure that impacts associated with Project Category 1 projects during construction would be less than significant.

Operation

New Production and Monitoring Wells

Impacts associated with the operation of these facilities would be similar to those identified in Project Category 1 projects where a Watermaster Party operating a site would be responsible for maintaining a site so that stormwater or nuisance water is treated prior to leaving the site, per the requirements set forth in mitigation measure HWQ-3.

Mitigation Measures

See Findings and Facts under Section E.2.8, Impact 4.9-2 mitigation measures HWQ-2 and HWQ-3, and Impact 4.9-4 mitigation measure HWQ-4.

Conclusions: TVMWD finds that construction/operation of Project Category 3 projects would not violate any water quality standards or waste discharge requirements, or otherwise

substantially degrade surface or ground water quality with implementation of mitigation measures HWQ-2 through HWQ-4.

Impact 4.9.5 Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Findings: Less Than Significant with Mitigation Incorporated

Facts: Regarding water quality control plans, see discussion in Findings and Facts E.2.8, Hydrology/Water Quality, Impacts 4.9-2 through 4.9-4.

Regarding compliance with a sustainable groundwater management plan, Senate Bills 1168 and 1319 and Assembly Bill 1739, signed by the Governor in September 2014, amended to California Water Code to establish the Sustainable Groundwater Management Act (SGMA). The SGMA requires the development of sustainable groundwater management plans for all medium- and high-priority basins, as defined by DWR; mandates the creation of local groundwater sustainability agencies to oversee and implement the plans; and outlines the guidelines and schedule for complying with the Act. Section 10721.8 of the amended Water Code exempts adjudicated areas and local agencies that conform to the requirements of an adjudication of water rights from the provisions of the SGMA (specifically naming the Six Basins as exempt) except for the following annual reporting requirements:

> By April 1, the Six Basins Watermaster must submit to the DWR a report containing the following information to the extent available for the portion of the basin subject to the adjudication: (a) Groundwater elevation data unless otherwise submitted pursuant to Section 10932.2; (b) Annual aggregated data identifying groundwater extraction for the preceding water year; (c) Surface water supply used for or available for use for groundwater recharge or in-lieu use for the preceding water year; (d) Total water use for the preceding water year; (e) Change in groundwater storage; and (f) The annual report submitted to the court.

Pursuant to the requirements of the SGMA, the Six Basins Watermaster has incorporated reporting items "a" through "f" within each of the Annual Report submitted to date. The intent of the Strategic Plan is to continue to manage the groundwater basins in a reliable and sustainable way in order to ensure a continuous supply of water to the Watermaster Parties and their customers.

Mitigation Measures

See Findings and Facts under Section E.2.8, Impact 4.9-1 mitigation measure HWQ-1; Impact 4.9-2 mitigation measures HWQ-2 and HWQ-3, and Impact 4.9-4 for mitigation measure HWQ-4.

Conclusions: TVMWD finds that construction/operation of Strategic Plan Project Category 3 projects would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan with the implementation of mitigation measures HWQ-1 through HWQ-4.

G.2.9 Noise

Impact 4.11-1 Generation of a substantial temporary or permanent increase in ambient noise levels, or ground-borne vibration 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?

Findings: Less Than Significant with Mitigation Incorporated

Facts: Because the Strategic Plan is a long-range plan (20 years), it is unknown when

The rehabilitation of the P-20 Well Site was evaluated with Project Category 1 projects because the proposed project represents upgrades to an existing well site similar to the projects identified in Project Category 1.

New Production and Monitoring Wells

Representative noise levels for project construction, including well drilling, crane activity and grading that would likely be associated with the construction of new production and monitoring wells, and new pipeline interconnects are shown in Table 5 in Findings and Facts Section E.2.9. The highest project construction equipment noise levels at 50 feet from a sensitive receiver is 70.7 dBA Leq. The A-weighted equivalent sound level is the sound level corresponding to a steady noise level over a given sample period with the same amount of acoustic energy as the actual time varying noise level. The energy average noise level during the sample period. This is above the noise standards for daytime (65 dBA) and nighttime (55 (dBA) established by cities within the Six Basins project area.

Similar to Project Category 1 projects and Project Category 2 projects, Project Category 3 projects must comply with the mitigation measures identified in the DPEIR and contained in Findings and Facts Section E.2.9, Noise. Mitigation measures include, preparing a focused construction noise and vibration mitigation plan (NOI-1 and NOI-5), requirements for construction contractors regarding maintenance of equipment and location of staging areas (NOI-2 and NOI-3), and the identification of equipment and material delivery routes. Mitigation measure NOI-6 outlines operational noise abatement measures to control noise related to site operation including measures specific to maintenance workers and vehicles, as well as the identification of pump house building elements designed to attenuate operational noise.

Implementation of mitigation measures NOI-1 through NOI-6 would ensure that impacts associated with the construction and operation of new production and monitoring wells would be less than significant.

New Pipeline Interconnects

The purpose of developing new interconnections is to increase the flexibility in conveying water to water-supply agencies in the region to facilitate the use of Six Basins groundwater during a temporary surplus or the interconnect between the Pomona WRP and the new recharge basin in the SASG, which is not necessarily a temporary water source. Pipeline construction may typically involve pavement removal, trenching/excavation and stockpiling, pipeline placement, backfilling and repaving; material and equipment staging. DPEIR Chapter 3, *Project Description*, Section 3.6.1, *Construction Activities*, in, lists the construction activities associated with new conveyance pipelines.

These can be placed generally within the construction reference noise levels outlined in Table 5, and these include truck pass-bys and dozer activity, dozer activity without truck pass-byes, non-drilling well pump construction activity and crane activity. Because pipeline construction is a temporary activity that is linear, construction noise may be a nuisance when the activity is occurring near a residence. Therefore, as construction is completed and the activity moves away, the noise levels are reduced in that location but continue in adjacent locations as construction of a pipeline is linear. Therefore, mitigation measures for construction activities NOI-1 through NOI-5 would be applicable to pipeline construction activities.

Mitigation Measures

See Findings and Facts under Section E.2.9, Impact 4.11-1 mitigation measures NOI-1 through NOI-6.

Conclusions: TVMWD finds that during construction of Strategic Plan Project Category 3 projects would not exceed noise level and vibration level standards with implementation of mitigation measures NOI-1 through NOI-5. Further TVMWD finds that for operation of new wells and treatment facilities, with existing noise attenuation (walls, screening, distance to nearest receptor) and the implementation of mitigation measure NOI-6, impacts associated with the operation of Project Category 3 projects would be less than significant.

G.2.10 Public Services/Recreation

Impact 4.13-1 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: i) Fire Protection; ii) Police Protection?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts:

Construction

Improvements at Pomona's P-20 site were evaluated along with other similar projects in Findings and Facts Section E.10, *Public Services/Recreation*.

The construction of new production wells, new monitoring wells, treatment facilities and pipelines/interconnects would not directly induce substantial population growth or employment growth in the Six Basins project area that would require an increase in calls for fire or police assistance.

Although not specifically proposed in the Strategic Plan, future production well sites may be proposed for development in high fire areas, the Watermaster Party proposing such a project must also require the construction contractor to implement mitigation measure HAZ-5 that requires the preparation and implementation of an FMP during construction activities. In addition, during construction of either the recycled water pipeline, new wells, or new pipelines associated with new wells that may be developed in high fire risk areas, there may be a need for the

preparation and implementation of a Construction Traffic Management Plan. Mitigation measures TR-1 through TR-3 require a construction contractor to develop and implement an approved Construction Traffic Management Plan addressing potential construction-related traffic detours and disruptions.

Operations

For long term operation of wells that would be located in high fire hazard areas, each Watermaster Party shall be responsible for maintaining a site free of debris and highly combustible vegetation. Generally, these sites would be small, less than one acre, paved and enclosed with a perimeter wall or fence. Because these sites do not contain habitable structures and would only be accessed periodically for maintenance and inspection of the wells, landscaping would likely be minimal and consist of a combination of low maintenance/drought tolerant plants and hardscape that may include rocks, pavers, or similar non-flammable material. For areas in the Fire Hazard Severity Zones, defensible space must be created around structures. Requirements are set forth in mitigation measure HAZ-6 for maintenance of facilities during long-term operation.

For long-term operation of pipelines, there would be no impacts on police or fire because pipelines would be underground.

Mitigation Measures

See Findings and Facts under Section E.2.11, Impact 4.14-1 mitigation measures TR-1 through TR-3, and Section E.2.7 mitigation measures HAZ-5 and HAZ-6.

Conclusions: TVMWD finds that during construction of Project Category 3 projects, if construction would impact a road, the Watermaster Party proposing a project would be required to develop and implement a Construction Traffic Management Plan prior to initiating construction. Such a plan shall be consistent with the appropriate city or county Emergency Response Plan as set forth in mitigation measures TR-1 through TR-3. Implementation of a Construction Traffic Management Plan would ensure that impacts associated with the interruption of traffic that may adversely impact response times during construction would be less than significant. Further, TVMWD finds that during construction and operation of Project Category 3 projects, the preparation and implementation of Fire Management Plans as set forth in mitigation measures HAZ-5 and HAZ-6 would reduce the potential for wildfires to adversely affect a project site would be less than significant.

G.2.11 Transportation

Impact 4.14-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Findings: Less Than Significant with Mitigation Incorporated

Facts Impacts associated with the rehabilitation of the existing P-20 well site were evaluated as a Project Category 1 project because improvements at this site would be similar to improvements at other existing well sites in the project area.

Construction

The project traffic engineer conducted a trip generation assessment assumed all construction activities associated with the Strategic Plan projects would occur within the same general time period (13 months) to maximize the number of trips associated with construction. However, the construction schedule for a new treatment facility or new well site is approximately four months (120 days). The following assumptions were made by the traffic engineer.

- All construction activities would occur between the hours of 7 am and 6 pm, Monday through Saturday (excludes Sundays and Holidays)
- Staging of equipment would occur on-site, so no daily arrival/departure of equipment was assumed to occur.
- *New Treatment Facility*: The number of construction workers was assumed to be 15, including equipment operators and laborers. This results in approximately 30 passenger car trips per day (15 employees x 2-way trip [inbound and outbound] = 30 trips per day). Based on the hours of construction, the employees were assumed to arrive on-site prior to the morning peak period (7-9 am) and depart after the evening peak period (4-6 pm).
- *New Well Sites*: A total of 6 workers was assumed to be on a project site at any one time. This results in approximately 12 passenger car trips per day (6 employees x 2-way trip [inbound and outbound] = 12 trips per day). Based on the hours of construction, the employees were assumed to arrive on-site prior to the morning peak period (7-9 am) and depart after the evening peak period (4-6 pm).
- *New Pipeline Interconnects*: The number of construction workers was assumed to be 15, including equipment operators and laborers. This results in approximately 30 passenger car trips per day (15 employees x 2-way trip [inbound and outbound] = 30 trips per day). Based on the hours of construction, the employees were assumed to arrive on-site prior to the morning peak period (7-9 am) and depart after the evening peak period (4-6 pm).

The Traffic Memo also assumed trips associated with the development of the recharge basins where excavated material would be exported, to represent a worst-case traffic scenario.

For all projects, each employee was assumed to drive to and from the construction site each day. The traffic engineer assumed that employees would arrive up to 30 minutes prior to the workday and leave up to 30 minutes after the workday ends. The project trip generation analysis showed that construction of projects identified in the Strategic Plan is anticipated to generate 192 vehicle trips per day with 12 morning peak hour trips and 12 evening peak hour trips. This equates to approximately 432 passenger car equivalent (PCE) vehicles per day with 36 PCE morning peak hour trips and 36 PCE evening peak hour trips.

In addition, construction projects are anticipated to generate fewer than 50 morning and evening peak hour trips. Therefore, traffic impacts associated with employee and construction-related activities are considered to be less than significant. However, there may be short-term impacts such as road detours or lane closures associated with pipeline construction well drilling, or equipment deliveries. Therefore, mitigation measures TR- through TR-3 were identified in the project's Trip Generation Memo (DPEIR Appendix G) to ensure that impacts can be minimized in the short term. No transportation/traffic impacts associated with the operation/maintenance of well sites, treatment facilities, spreading grounds, etc., were anticipated as these activities would be intermittent and be limited to one or two vehicles on site.

Mitigation Measures

See Findings and Facts under Section E.2.11, Impact 4.11-1 mitigation measures TR-1 through TR-3.

Conclusions: TVMWD finds that during construction of Project Category 3 projects, if construction would impact a road, the Watermaster Party proposing a project would be required to develop and implement a Traffic Control Plan prior to initiating construction. Such a plan shall be consistent with the appropriate city or county Emergency Response Plan as set forth in mitigation measures TR-1 through TR-3. Implementation of a Construction Traffic Management Plan would ensure that impacts associated with the interruption of traffic that may adversely impact response times during construction would be less than significant.

Impact 4.14-3 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: There are no new road development projects associated with Project Category 3 projects. Improvements to project sites include the development and operation of new groundwater production and monitoring wells, and the construction of new pipelines between well sites and treatment plants or between the Pomona WRP and the new SASG recharge basin. For the purposes of the DPEIR, it was assumed that all sites are currently accessible from existing roads. Parking of construction and maintenance vehicles and equipment would occur on each of the project sites, or for brief periods during construction or scheduled maintenance during operation, may be parked at the curb adjacent to a project site. At such times, the construction contractor would be required to develop and implement a Construction Traffic Management Plan, as set forth in mitigation measures TR-1 through TR-3, and approved by the respective jurisdiction in which the project site is located. Implementation of the Construction Traffic Management Plan for each project, as appropriate, would ensure that impacts would be less than significant.

Mitigation Measures

See Findings and Facts under Section E.2.11, Impact 4.1-1 mitigation measures TR-1 through TR-3.

Conclusions: TVMWD finds that during construction of Project Category 3 projects, if construction would impact a road, the Watermaster Party proposing a project would be required to develop and implement a Construction Traffic Management Plan prior to initiating construction. Such a plan shall be consistent with the appropriate city or county Emergency Response Plan as set forth in mitigation measures TR-1 through TR-3. Implementation of a Construction Traffic Management Plan would ensure that impacts associated with the interruption of traffic that may adversely impact response times during construction would be less than significant.

Impact 4.14-4 Result in inadequate emergency access?

Findings: Less Than Significant with Mitigation Incorporated

Facts: In order to ensure that project construction at each of the project sites would not result in impacts to emergency access, mitigation measuresTR-1 through TR_3 have been identified that include the development and implementation of Construction Traffic Management Plans to be

approved by jurisdictions in which a project is proposed; delivering and removing heavy equipment during off peak hours; and limiting vehicle trips to off peak hours. Therefore, with implementation of these mitigation measures, impacts would be less than significant.

Mitigation Measures

See Findings and Facts under Section E.2.11, Impact 4.11-1 mitigation measures TR-1 through TR-3.

Conclusions: TVMWD finds that during construction of Project Category 3 projects, if construction would impact a road, the Watermaster Party proposing a project would be required to develop and implement a Construction Traffic Management Plan prior to initiating construction. Such a plan shall be consistent with the appropriate city or county Emergency Response Plan as set forth in mitigation measures TR-1 through TR-3. Implementation of a Construction Traffic Management Plan would ensure that impacts associated with the interruption of traffic that may adversely impact response times during construction would be less than significant.

G.2.12 Utilities and Service Systems

Impact 4.15.1 Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater, drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts:

Wastewater Treatment

Construction of new production wells, monitoring wells, treatment plant, and pipeline interconnects would not require or result in the relocation of an existing wastewater treatment plant or construction of a new wastewater treatment plant. Similar to Project Category 1 projects, during construction of Project Category 3 projects, there would be no discharge to existing wastewater systems associated with the proposed projects. Portable toilets would be used at each site, and the sanitary wastes would be hauled from each site for appropriate disposal at a regional wastewater treatment facility.

During operation, no employees will be working on site on a daily basis, so no restroom facilities would be required. Site inspections may occur on a daily basis where a water district or water company employee would enter the site to inspect operating conditions, but these site visits would be short, and no extended stay is anticipated that would require restroom facilities. During construction, portable toilets and hand wash stations would be delivered to a site and serviced (pumped and transported off site) by a professional service provider. Therefore, there would be no impacts to wastewater treatment systems.

Water Treatment

Implementation of Project Category 3 projects would result in the development of new groundwater production wells and related pipelines and interconnects between the new wells and a new water treatment facility, or existing water treatment facilities in the Six Basins project

area. New monitoring wells would also be developed in the vicinity. The purpose of Project Category 3 projects is to address high groundwater problems in the lower portion of the Six Basins that can occur in the Six Basins during wet periods when high volumes of stormwater recharge within the existing basins in the SASG can occur. High groundwater in the UCHB migrates to the south and can cause or contribute to high groundwater conditions in the southern portion of this basin as well as the LCHB, and the northern portion of the Pomona Basin. Proposed improvements would result in increased groundwater production in the project area during periods of high groundwater in these basins. Proposed new groundwater wells would be interconnected with existing treatment plants or a new treatment plant. Pipeline interconnects would not result in the need to construct new water treatment facilities beyond what is identified in the Strategic Plan.

Stormwater/Drainage

Similar to Project Category 1 projects, Project Category 3 projects would be located in an urban area where storm drain infrastructure is in place. Development of new wells and underground pipelines to connect to existing or new treatment facilities at existing sites could affect on-site drainage patterns as well as off-site drainage volume and require the construction and operation of new and/or expanded stormwater drainage facilities. However, because Project Category 3 project sites would likely be located in an urban area where storm drain facilities are in place, the issue is one of control of stormwater runoff from a project site. Mitigation Measure USS-1 requires that prior to construction at Project Category 1 and Project Category 3 project sites, the Watermaster Party proposing a project shall prepare a drainage plan that includes design features to reduce stormwater peak concentration flows exiting a site so that the capacities of the existing downstream drainage facilities are not exceeded. Such design features may include bioretention, sand infiltration, return of stormwater for treatment within the treatment plant, and/or detention facilities. Therefore, implementation of a site-specific drainage plan as set forth in mitigation measure USS-1, would ensure that impacts associated with on-going operation of a Project Category 3 site would be less than significant.

Electric Power

During construction, electric power may be available from local SCE power lines. However, equipment that requires additional power will be from diesel generators. Some equipment may also use gasoline. None of these fuels will be stored on site, instead they will be brought to the site when needed to refuel equipment. Once construction is completed, operation of the facility will utilize electric power from the grid.

Natural Gas

During construction and operation, no natural gas will be use at any of the project sites. Therefore, there would be no impact.

Telecommunications

During construction and operation, no telecommunications infrastructure would be required. Therefore, there would be no impact.

Mitigation Measures

See Findings and Facts under Section E.2.12, Utilities and Service Systems, Impact 4.14-1 mitigation measure USS-1.

Conclusions: TVMWD finds that with implementation of mitigation measure USS-1 for a Watermaster Party proposing a project to prepare and implement a drainage plan with design features to reduce stormwater peak concentration flows exiting the above ground facility sites so that the capacities of the existing downstream drainage facilities are not exceeded. These design features could include bioretention, sand infiltration, return of stormwater for treatment within the treatment plant, and/or detention facilities.

Impact 4.15.4 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; and comply with federal, state, and local management and reduction regulations related to solid waste?

Findings: Less Than Significant with Mitigation Incorporated

Facts: Construction activities for Project Category 3 projects would generate construction and demolition (C&D) waste that would require hauling off site. Solid waste generated during construction of the proposed Project Category 3 projects would mainly consist of small quantities of general C&D debris such as vegetation resulting from clearing and grubbing activities, concrete or asphalt (if construction requires the removal of pavement to develop new wells or a treatment facility), cardboard and wrapping material, worker personal waste (food wrappers, newspapers), and possibly excavated soils. Even small volumes of construction-related waste and inert demolition debris will require disposal during proposed project construction. The California Green Building Standards Code (CGBSC) requires that when construction and/or demolition is proposed, a Construction Waste Management Plan be implemented that results in the recycling and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste generated by a construction project. The Code Section states that where a local jurisdiction has more stringent ordinance, that ordinance would supersede the CGBSC. Therefore, mitigation measure USS-2 has been identified that requires the construction contractor to submit a C&D disposal plan to the local jurisdiction for review and approval, that identifies the C&D waste to be diverted from a landfill, and a facility where the C&D waste will be taken. Implementation of a site-specific C&D Disposal Plan would ensure that this impact would be less than significant.

During operation, the generation of solid waste would be minimal as most site visits would be for inspection only. Periodic maintenance may result in the generation of small amounts of material such as cardboard or other wrapping materials. This material would be taken off-site to a Watermaster Parties' corporate yard, or construction contractor's yard to be recycled along with other recyclable material in a recycling bin. Therefore, a less than significant impact is anticipated during operation of groundwater wells and treatment facilities.

Mitigation Measures

See Findings and Facts under Section E.2.12, Impact 4-15-1 mitigation measures USS-2.

Conclusions: TVMWD finds that implementation of mitigation measures USS-2 to prepare and implement a Construction and Demolition Disposal Plan would reduce the amount of construction and/or demolition material that would otherwise go to a landfill. Diverting C&D

material from landfills helps extend the life of landfills and increase the amount of C&D material that can be recycled and reused at other construction sites.

H. FINDINGS FOR PROJECT CATEGORY 4 – MONITORING PROGRAMS IN SUPPORT OF THE STRATEGIC PLAN

This Section contains the findings for Project Category 4 - Monitoring Programs in Support of the Strategic Plan (*Monitoring Programs*). Those environmental issues identified in the DPEIR for Monitoring Programs in Support of the Strategic Plan projects as having no impact or no potential for significant adverse impact, with or without mitigation. Because there are no physical changes in the environment associated with implementation of this category of projects, there are no findings for no impacts, less than significant impacts, or potentially significant impacts. Monitoring wells that may be developed as part of a monitoring program were evaluated in Project Category 3 – Temporary Surplus. Monitoring programs will provide the necessary data for TVMWD and other Watermaster Parties to make informed decisions on their respective Strategic Plan for Project Category 1, Project Category 2, and Project Category 3 projects, and determine the appropriate level of subsequent environmental review during the planning/design phase of these projects as allowed by CEQA Guidelines Section 15152, Tiering.

I. FINDINGS REGARDING CUMULATIVE IMPACTS

CEQA Guidelines Section 15130 states that an EIR must discuss cumulative impacts when the project's incremental effects are cumulatively considerable. A cumulative impact is defined as one that is created as a result of a combination of the proposed project's impacts in conjunction with impacts associated with other past, present or reasonably foreseeable projects. CEQA Guidelines Section 15130(b) outlines the elements necessary to adequately address the significance of cumulative impacts and describes the two methods for the evaluation of these impacts. These are either: (1) a list of past, present, and probable future projects producing related or cumulative impacts; or (2) a summary of projection contained in an adopted General Plan or related planning document which is designed to evaluate regional or area-wide conditions.

Because the Strategic Plan includes a number of projects located within a geographic area at sites in the cities of Claremont, La Verne, Pomona and Upland, the cumulative analysis took the form of a discussion of projections contained in an adopted regional planning document. The planning document used for this analysis was the Southern California Association of Governments *2016-2040 Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCS) Demographics and Growth Forecast*. The growth forecast provides assumptions regarding population growth and related housing and employment growth that would occur within the cities located within the service areas of the Six Basins Watermaster Parties. SCAG's population, housing and employment projections are described in Section 4.13, *Population and Housing*.

I.1 Aesthetics

Findings: Less Than Significant with Mitigation Incorporated

Facts:

Scenic Vistas and Scenic Quality

With regard to the overall visual and scenic character of the project area, cumulative development may result in more alterations of the existing visual quality of the project area and adversely affect scenic quality. The Six Basins project area is largely urbanized with residential, commercial, and industrial land uses. Although future growth in the project area has slowed due in part to the limited amount of vacant land left to develop, there are still areas, particularly along the foothills of the San Gabriel Mountains where development may still occur. This would likely be additional single-family neighborhoods similar to those that have been developed in the foothills already.

With the exception of the proposed TCSG and SASG improvements, there are no Strategic Plan projects located in areas considered to be scenic, or that would adversely affect (obscure views) of the scenic San Gabriel Mountains and foothills. Project Category 1 projects would not result in substantial degradation of existing scenic vistas because these all consist of improvements at existing well and/or water treatment facilities, and where applicable, proposed improvements may be subject to the implementation of mitigation measure AES-1 if they would result in significant impacts to views, scenic vistas, or the character of an existing area. Likewise, the rehabilitation of the P-20 well site and development of new production wells would be subject to the same measure. Therefore, with implementation of mitigation measure AES-1, implementation of the Strategic Plan and related projects would not contribute to the severity of a cumulative impact on Aesthetics.

Thompson Creek Spreading Grounds

As discussed under Aesthetics Impact 4.-1-1, the area of the TCSG where the earthen basins would be developed is obscured from views looking from the south, and partially obscured from the west and east by topography. The spreading grounds would be visible from vantage points along the upper stretch of Mills Road and along trails within the Claremont Hills Wilderness Park. Views of the site are visible from some vantage points along trails, however, under existing conditions, these views are of the dam and related infrastructure (e.g., concrete walls and channels). Adding earthen basins generally between the dam and the channel would remove vegetation, however, there is no significant infrastructure to be developed that would further urbanize the site. Where applicable, proposed improvements may be subject to the implementation of mitigation measure AES-1 if they would result in significant impacts to the character of an existing area. Therefore, improvements in the TCSG would not significantly contribute cumulatively to impacts to scenic vistas or scenic quality.

San Antonio Creek Spreading Grounds

As discussed under Impact 4.1-1, the SASG south of the dam is not a pristine area. The total area of the SASG is approximately 1.4 square miles or 980 acres. The area is disturbed in a number of places by a variety of land uses. There are currently two areas below the San Antonio Dam where spreading occurs. In addition, the SASG area is developed with a series of aggregate mine pits along the east side of the wash, several access roads, the concrete lined San Antonio Channel, SCE towers, and a number of unpaved access roads. The new recharge facility would be developed at grade and below, and the neighborhoods and public streets that are located adjacent to the SASG are located above the grade of the wash. Therefore, although the new recharge facility will be visible within the scenic vista that is the San Gabriel Mountains and foothills, it would not obscure views. Where applicable, proposed improvements may be subject to the implementation of mitigation measure AES-1 if they would result in significant impacts to the character of an existing

area. Therefore, the SASG improvements would not significantly contribute cumulatively to impacts on scenic vistas or scenic quality.

Light and Glare

A number of the Strategic Plan projects consist of improvements to existing facilities or the development of new production wells. Under existing conditions, these facilities are behind walls and mature landscaping. Development of new wells and related facilities would be treated in a similar manner. Lighting associated with these projects are limited to security lighting. New construction would be subject to the requirements of mitigation measures AES-2 through AES-4 for light and glare. New construction would be painted a neutral color to eliminate the possibility of creating new sources of glare. Regarding spreading grounds projects, there is no lighting associated with these projects, and glare that may be reflected off water in the basins would be minimal because the basins are not intended to be filled with water year-round, only during storm events or when supplemental water is being spread. Therefore, the proposed Strategic Plan and related project would not significantly contribute cumulatively to impacts regarding the creation of light and glare.

Conclusions: TVMWD finds that where applicable, proposed improvements to existing well sites, or at new well sites and/or treatment facilities may be subject to the implementation of mitigation measure AES-1 if they would result in significant impacts to the character of an existing area. Regarding the recharge projects, improvements at spreading grounds sites would not significantly contribute cumulatively to impacts on scenic vistas or scenic quality. Because these projects would be developed at or below ground surface, thus no obstruction of views of scenic resources or vistas would occur. Construction of new wells and treatment facilities would be subject to the requirements of mitigation measures AES-2 through AES-4 for light and glare. Therefore, with implementation of mitigation measures AES-1 through AES-4 the proposed Strategic Plan and related projects would not significantly contribute cumulatively to impacts on Aesthetics.

I.2 Agricultural Resources

Findings: No Impact

Facts: Because implementation of the Strategic Plan and related projects would not result in impacts to Agriculture or Forestry Resources, the proposed project would not contribute to any cumulative impacts.

Conclusions: TVMWD finds that implementation of the Strategic Plan and related projects would not contribute cumulatively to affects on agricultural or forestry resources because the project area does not include such resources.

I.3 Air Quality/Greenhouse Gasses/Global Climate Change

Findings of Fact: Less Than Significant with Mitigation Incorporated

Facts: SCAQMD has published a report on how to address cumulative impacts from air pollution: *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution.* In this report SCAQMD clearly states that:

> *"…the SCAQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for toxic air contaminant (TAC) emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.*
>
> *Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."*

The project area is located within the South Coast Air Basin which is a non-attainment basin for a number of criteria pollutants as shown the table below.

The Air Quality Impact Analysis (DPEIR Appendix B.1) assumed that individual projects that do not generate construction or operational emissions that exceed SCAQMD's recommended daily thresholds for project-specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual project-related construction emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable.

Criteria Pollutant	State Designation[1]	Federal Designation[1]
Ozone – 1-hour standard	Nonattainment	--[2]
Ozone – 8-hour standard	Nonattainment	Nonattainment
Particulate Matter (PM10)	Nonattainment	Attainment
Particulate Matter (PM2.5)	Nonattainment	Nonattainment
Carbon Monoxide (CO)	Attainment	Unclassifiable/Attainment
Nitrogen Dioxide (NO2)	Attainment	Unclassifiable/Attainment
Sulfur Dioxide (SO2)	Unclassifiable/Attainment	Unclassifiable/Attainment
Lead (Pb)[3]	Attainment	Unclassifiable/Attainment

Source: Urban Crossroads, Six Basins, Air Quality Impact Analysis, Cities of Claremont, La Verne, Pomona, and Upland, and the County of Los Angeles, Six Basins Watermaster, February 2021, Table 2-3.

Construction Impacts

The project-specific evaluation of emissions presented in Impact 4.3-1 demonstrated that, after implementation of applicable mitigation measures AQ-1 through AQ-3, construction-source air pollutant emissions would not result in exceedances of regional thresholds. In conducting the

evaluation of emissions related to construction, the Air Quality Impact Analysis utilized the CALEEMod that assumed compliance with SCAQMD Rules 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings). Therefore, mitigation was built into the analysis of construction impacts based on these rules. Although additional mitigation is not required to reduce estimated maximum daily construction regional emissions, mitigation measures would be required to decrease localized emissions. Implementation of these localized emissions mitigation measures would further reduce already less-than-significant regional emissions. Therefore, construction-source emissions would be considered less than significant on a project-specific and cumulative basis.

Operational Impacts

The project-specific evaluation of emissions presented in the preceding analysis demonstrates that, project operational-source air pollutant emissions would not result in exceedances of regional thresholds. Therefore, implementation of the Strategic Plan and related projects would not contribute to the severity of a cumulative impact on Air Quality, Greenhouse Gasses or Global Climate Change.

Conclusions: TVMWD finds that the per the Air Quality Impact Analysis (DPEIR Appendix B.1), where individual projects do not generate construction or operational emissions that exceed SCAQMD's recommended daily thresholds for project-specific impacts, they would also not cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Further TVMWD finds that with implementation of Air Quality mitigation measures AQ-1 through AQ-3 for the control of emissions of pollutants during construction, such impacts can be mitigated to less than significant levels and would not contribute to a cumulatively significant impact to Air Quality.

I.4 Biological Resources

Findings: Less Than Significant with Mitigation Incorporated

Facts: The proposed project sites are predominantly developed and surrounded by urban development and do not contain sensitive biological resources and would not result in potential cumulative impacts. Two projects, SASG and TCSG are in areas that have been partially developed with the construction of dams and groundwater spreading grounds, as well as the development of various stormwater facilities that have channelized portions of San Antonio Creek and Thompson Creek. As a result of these ongoing activities, both project areas have experienced impacts since the early 1900s and the remaining undeveloped areas do not support pristine, undeveloped habitat. With proper protection of the SASG and TCSG project sites, as required with implementation of the biological mitigation measures BIO-1 through BIO-4, the proposed projects and any future development in the project area will work within the existing regulations for the protection of biological resources.

In addition, where new projects are proposed (Project Category 3), such projects would be subject to implementation of mitigation measures BIO-1 through BIO-4, prior to or during construction or maintenance activities such as that associated with maintaining the functionality of the recharge basins. Therefore, the proposed Strategic Plan and related project would not significantly contribute cumulatively to impacts on Biological Resources.

Conclusions: TVMWD finds that with implementation of mitigation measures BIO-1 through BIO-2 during construction and/or maintenance activities (operations), implementation of the Strategic Plan and related projects would not significantly contribute cumulatively to impacts on Biological Resources.

I.5 Cultural Resources/Tribal Cultural Resources

Findings: Less Than Significant with Mitigation Incorporated

Facts:

Archaeological and Historical Resources

Although the Six Basins project area is largely urbanized with residential, commercial, and industrial development, there are still opportunities for development to occur as identified in cities' general plans. The project area contains a significant archaeological and historical record, therefore, there is the potential for Strategic Plan projects and other future development projects in the project area to disturb known or unknown historical and archaeological resources, including archaeological sites, historic era built resources, and resources of traditional and cultural significance to Native American tribes.

The potential construction impacts associated with the development of projects in Project Categories 1 through 3, in combination with other projects as a result of growth in the area, could contribute to a cumulatively significant impact on cultural resources. However, like the Strategic Plan projects, each of these projects would be required to go through a development review process that would likely require the assessment of a project's impacts on Cultural Resources and Tribal Cultural Resources.

On a project-by-project basis, the Watermaster Party proposing a project would be required to implement mitigation measure CUL-1 that requires hiring a qualified archaeologist to identify any potentially significant archaeological resources. The study would outline measures to reduce or avoid impacts to potentially significant archaeological resources. In addition, if a project site contains structures that are 45 years old or older, or the site is located adjacent to an historical structure or within a historic district, the project proponent (Watermaster Party) shall implement mitigation measure CUL-2 prior to finalization of design/site plans. This measure requires the completion of a historic built environment survey to evaluate potentially historic structures for their potential historic significance. If potentially significant resources are encountered during the survey, a treatment plan shall be prepared prior to demolition or substantial alteration of such resources identified. Therefore, with implementation of mitigation measures CUL-1 and CUL-2, project implementation would result in a less-than-significant impact involving an adverse change in the significance of an historical or archaeological resource. Therefore, the proposed Strategic Plan and related project would not significantly contribute cumulatively to impacts on Cultural Resources and Tribal Cultural Resources.

Discovery of Human Remains

The Six Basins project area is largely urbanized with residential, commercial, and industrial development. With development of Strategic Plan projects and cumulative growth as identified in each city's general plan, it is possible, but unlikely, that construction activities could impact unknown human remains. However, implementation of mitigation measure CUL-3, which sets

forth the requirements under Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5, the cumulative potential to impact human remains would be less than significant.

Tribal Cultural Resources

On a project-by-project basis throughout the Six Basins project area, any local agency (e.g., city, county, water district) is required to conduct tribal consultation as set forth in AB 52, when a project that is not exempt from CEQA is proposed. For the Strategic Plan, future projects may require additional environmental review in the form of a subsequent Mitigated Negative Declaration or subsequent EIR. Regarding Project Category 1 projects, most if these sites are already developed with facilities and for some projects, no additional ground disturbance may be required. However, where ground disturbance is required (e.g. Durward 2 new well and wellhead treatment facility), AB 52 consultation would be required. Regarding the SASG and TCSG projects, the exact location of new recharge basins is only preliminary, and additional subsequent environmental review would likely be required including Tribal Consultation under the requirements of AB 52. Then, because the location of individual projects is not known at this time for Category 3 projects (with the exception of the rehabilitation of the P-20 well site), subsequent environmental review would be required on a project-by-project basis, including Tribal Consultation under the requirements of AB52.

Conclusions: TVMWD finds that Strategic Plan projects that would be subject to subsequent review for the potential to discover Cultural and Tribal Cultural Resources would go through the AB 52 consultation process. Consultation may result in additional information being provided by a tribe that could add to our understanding of tribal culture in the area and would be included in a site-specific Cultural Resources Assessment. Consultation with Native American tribes under AB 52, and implementation of mitigation measures CUL-1 through CUL-4, would ensure that the development of Strategic Plan projects would not contribute to the exacerbation of cumulative impacts regarding Cultural and/or Tribal Cultural Resources.

I.6 Environmental Justice

Findings: Less Than Significant with Mitigation Incorporated

Facts: Implementation of the Strategic Plan and related projects would not contribute to the severity of an existing cumulative impact because the intent of the Strategic Plan is to address water supply and water quality issues throughout the Six Basins project area regardless of residents' race or income status. In general, where environmental impacts have the potential to be significant (e.g., air quality, water quality), mitigation measures have been identified that would reduce these impacts to less than significant levels. In addition, most impacts associated with Strategic Plan projects are related to the construction of new treatment facilities (Project Category 1) water recharge basins (Project Category 2), new wells, treatment facilities and interconnects between new facilities (Project Category 3) and the development and implementation of groundwater monitoring programs in support of other categories of projects (Project Category 4). Once construction is completed and sites are operational, impacts associated with operation of facilities would be less than significant and related to site inspections and periodic maintenance.

Conclusions: TVMWD finds that implementation of the Strategic Plan and related projects would not contribute to the severity of an existing cumulative impact because the intent of the Strategic Plan is to address water supply and water quality issues throughout the Six Basins project area regardless of residents' race or income status. Therefore, the proposed Strategic Plan and related project would not significantly contribute cumulatively to impacts on disadvantaged communities.

I.7 Geology/Soils/Mineral Resources/Paleontological Resources

Findings: Less Than Significant with Mitigation Incorporated

Facts

Geology and Soils

Future cumulative development in the Six Basins project area may experience significant impacts associated with fault rupture and strong seismic ground shaking, that could in turn trigger seismic-related geological hazards such a liquefaction and landslides. Future projects including those proposed by the Six Basins Watermaster Parties, when combined with other projects envisioned in the cities and counties' general plan land use and population projections would subject new residents and habitable structures to seismic-related hazards. Therefore, this impact is considered to be cumulatively significant before mitigation measures are implemented.

Conclusions" TVMWD finds that on a project-by-project basis, in order to reduce the potential impacts from strong seismic ground shaking and non-seismically induced geologic hazards, the DPEIR identified mitigation measures including GEO-2 requiring the completion of a design-level geotechnical investigation that identifies design criteria to mitigate for seismic and non-seismic geotechnical hazards. This is a standard mitigation measures that would apply to proposed development projects in the State of California. Therefore, on a cumulative level, with all proposed projects implementing such a mitigation measure and complying with the recommendations in a site-specific geotechnical investigation report, implementation of the Strategic Plan would not significantly contribute cumulatively to impacts related to geology and seismicity.

Paleontological Resources

Most cities within the Six Basins Strategic Plan project area as well as the counties of Los Angeles and San Bernardino have addressed the potential for paleontological resources to be adversely affected during construction of proposed projects and have established general plan policies and programs that address the potential impacts to unknown paleontological resources. For those cities that have not specifically addressed these resources, the CEQA Guidelines require paleontological resources to be addressed in CEQA documents. Therefore, with implementation of mitigation measures as set forth in respective general plans and/or general plan program EIRs, and mitigation measure GEO-3 identified in Six Basins Strategic Plan Draft PEIR, impacts on paleontological resources would be less than significant on a project level and on a cumulative level.

Conclusions: TVMWD finds that with implementation of mitigation measure GEO-3 requiring a qualified paleontologist to be retained to determine the necessity of conducting a study of the project area(s) based on the potential sensitivity of the project site for paleontological resources. On a project-by-project basis, the paleontologist shall determine the level of research and

monitoring required during construction of a Strategic Plan project. therefore, implementation of the Strategic Plan would not significantly contribute cumulatively to impacts on paleontological resources.

Mineral Resources

In 2007, the California Geological Survey, Department of Conservation published an update of the Mineral Land Classification for Portland Cement Concrete (PCC) Grade Aggregate in the Claremont-Upland Production-Consumption Region. The conclusions reached were:

1. As of January 2006, four mines were producing PCC-grade aggregate in the region.
2. The anticipated consumption of aggregate in the region through 2056 is estimated to be 240 million tons of which 169 million tons must be PCC quality.
3. Since 1984, permitted PCC-grade aggregate reserves have increased from 55 million tons to 121 million tons extending the projected depletion date from 1991 to 2034.
4. About 19 percent or 821 acres of the 4,310 acres of lands designated in 1987 has been lost to land uses incompatible with mining. This equates to 110 million tons of PCC-grade aggregate resources lost.

Conclusions: TVMWD finds that implementation of the Strategic Plan and related projects developed to enhance stormwater and supplemental water recharge at the SASG and TCSG would not result in a loss of aggregate resources because these projects do not include the development of permanent buildings or other improvements that would preclude the extraction of aggregate resources in the future. Therefore, the project would not contribute to a cumulative impact to mineral resources.

I.8 Hazards/Hazardous Materials/Airport Safety/Wildfires

Findings: Less Than Significant with Mitigation Incorporated

Facts

Hazards and Hazardous Materials

The Six Basins project area is largely urbanized with residential, commercial, and industrial uses. As the project area continues to develop, the addition of more similar land uses could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. All new projects proposed within the Six Basins project area would be subject to federal, State, and local regulations related to the routine transportation, use, storage, and disposal of hazardous materials. Since the proposed Strategic Plan and related projects would result in less than significant impacts related to the routine handling, use or disposal of hazardous materials, the projects' contributions to such impacts would be less than cumulatively considerable with mitigation incorporated, and therefore, would result in a less than significant cumulative impact. Mitigation measures have been identified where a project would require permits to construct/operate treatment plants and if proposed, backup diesel generators (HAZ-1), or for recharge basins, where there is a potential for vectors (e.g. mosquitos, midges) to breed (HAZ-2). Therefore, the project would not contribute to a cumulative impact in regard to transportation, use or disposal of hazardous materials,

Proximity to School Sites

The Six Basins project area is largely urbanized with residential, commercial, and industrial development. As the project area continues to develop, there is the potential for some of these projects to emit hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. All cumulative development would be subject to federal, State, and local regulations related to the routine transportation, use, storage, and disposal of hazardous materials. Since the proposed Strategic Plan and related projects would not result in potentially significant impacts related to releasing hazardous emissions or materials within one-quarter mile of a school, the projects' contributions to such impacts would be less than cumulatively considerable and therefore, would not contribute to a cumulative impact regarding proximity to schools.

Hazardous Materials Site Pursuant to Government Code Section 65962.5

A search of the relevant databases where hazardous materials sites are listed was conducted for the DPEIR. The result was that none of the projects identified in the Strategic Plan are located on a site listed in a database pursuant to Government Code Section 65962.5. However, the location of new production and monitoring wells or a new treatment plant, or the alignment of new pipeline interconnects are not precisely known. Therefore, mitigation measure HAZ-3 requires the Watermaster Party proposing a project, to undertake an environmental site assessment (ESA) to determine if a selected site contains hazardous materials or contaminated soil. If the ESA determines that a site requires remediation, that activity would be undertaken prior to any grading or construction at a site to ensure people are not exposed to hazardous conditions. This is a standard mitigation measure for most proposed development projects in urban areas such as the Six Basins project area. With implementation of mitigation measure HAZ-3 to complete an ESA, including remediation of required on a project-by-project basis, this impact can be reduced to a less than significant level. Therefore, implementation of the Strategic Plan would not contribute to a cumulative impact regarding contaminated sites.

Airport Land Use Compatibility

The Six Basins project area is largely urbanized with residential, commercial, and industrial development. As the project area continues to develop, the addition of more projects could be located within an airport land use plan which could result in a safety hazard for people residing or working in the project area. Since the proposed Strategic Plan projects do not include new residents or employees at project sites or structures exceeding height requirements, implementation of the Strategic Plan would not contribute to a significant cumulative impact regarding human health and safety. Some new projects could be constructed within an airport land use plan however, implementation of mitigation measure HAZ-4 would ensure that a Watermaster Party whose project falls within the plan boundary would comply with the guidelines of the relevant airport land use plan. Therefore, implementation of the Strategic Plan would not contribute to a cumulative impact regarding airport land use compatibility.

Wildfire Hazards

Two projects in Project Category 2 – new recharge basins in the SASG and TCSG would be located in a Fire Hazard Severity Zone and there is a potential for future projects in Project Category 3 (e.g., new production wells and the pipeline between the Pomona WRP and the SASG)

to be located nearby. Impacts could be cumulatively considerable and therefore, would result in a potentially significant cumulative impact. However, mitigation measures HAZ-5 and HAZ-6 have been identified that would require a Watermaster Party proposing a project within a Fire Hazard Severity Zone to develop and implement a Fire Management Plan. Therefore, implementation of the Strategic Plan would not contribute to a significant cumulative Wildfire Hazards impact

Emergency Planning

The Six Basins project area is largely urbanized with residential, commercial, and industrial development. As the project area continues to develop, the addition of more projects could impair implementation of or physically interfere with an adopted emergency response plans or emergency evacuation plans during construction of facilities, particularly new pipelines and interconnects between wells and treatment facilities, or between the Pomona WRP and the new SASG recharge basin. Implementation of mitigation measures TR-1 through TR-3 (see Section 4.14, *Transportation*) would ensure that a Watermaster Party whose project would affect a public right-of-way would implement a Construction Traffic Management Plan in coordination with the local jurisdiction (Police and Fire departments). Therefore, with implementation of mitigation measures TR-1 through TR-3 implementation of the Strategic Plan and related projects would not contribute to a significant cumulative impact regarding emergency planning.

Conclusions: TVMWD finds that with implementation of mitigation measure HAZ-1 requiring the receipt of permits to construct/operate for new treatment plants (project Categories 1 and 3); mitigation measure HAZ-2 for vector control plans (Project Category 2); mitigation measure HAZ-3 for conducting environmental site assessments on new project sties (Project Category 3); mitigation measure HAZ-4 for compliance with an airport land use compatibility plan, if applicable (Project Category 3); and HAZ-4 and HAZ-5 for projects located in a Fire Hazard Severity Zone (Project Categories 2 and 3); impacts associated with the implementation of the Strategic Plan and related projects would be reduced to less than significant levels and would not contribute to a significant cumulative impact.

I.9 Hydrology/Water Quality

Findings: Less Than Significant with Mitigation Incorporated

Facts Concurrent construction of development projects in the Six Basins project area could result in temporary impacts to groundwater and surface hydrology and water quality. Each cumulative project is subject to the same federal, State, and local requirements regarding implementation of best management practices under the Construction General Permit (SWPPP requirements), the General Watering Permit (if perched groundwater or other dewatering activities are included in a proposed project), and the Los Angeles County and San Bernardino County MS4 Permits.

Conclusions: TEMVW finds that compliance of all cumulative projects with the requirements of each projects' relevant permits, cumulative development would not result in a violation of water quality standards, waste discharge requirements, or otherwise substantially degrade water quality. None of the proposed Six Basins Strategic Plan projects would result in violations to Waste Discharge Requirements or Water Quality Standards and would comply with such requirements and standards; and with mitigation incorporated, their contribution to cumulative impacts associated with groundwater and surface water quality standards, waste discharge requirements,

or degradation of water quality would be less than cumulatively considerable. Therefore, implementation of the Strategic Plan would not contribute to a significant cumulative impact on Hydrology or Water Quality.

I.10 Land Use

Findings: Less Than Significant Impact

Facts: The Six Basins project area is characterized as a developed urbanized area with the exception of the foothills of the San Gabriel Mountains and open space associated with the San Jose Hills and Bonelli Park. The project area is largely built-out so that future cumulative development as envisioned in each of the cities' and counties' general plans would not likely result in the division of established communities within the Six Basins project area.

Regarding, consistency with various planning documents, proposed new or upgraded facilities such as production and monitoring wells, treatment facilities and spreading grounds would all be developed at or below grade on a number of sites already utilized for these uses, or owned by Watermaster parties for future similar uses. There may be occasion when a new location, not currently occupied by a water production use, is acquired. In such a case, land uses would be similar to those evaluated in this Program EIR.

Conclusions: TVMWD finds that the potential for the implementation of the Strategic Plan and related projects to contribute to a cumulative land use impact on established communities or create impacts that would contribute a significant cumulative impact on existing neighborhoods would be less than significant. Therefore, implementation of the Strategic Plan would not contribute to a significant cumulative impact on Land Use and Planning.

I.11 Noise

Findings: Less Than Significant with Mitigation Incorporated

Facts: Future cumulative development could result in the exposure of persons to or generation of noise levels in excess of standards established in a local general plan or noise ordinance potentially resulting in significant impact. Construction of proposed Strategic Plan projects could result in excessive noise levels during construction. However, construction activities are short term and once completed, noise associated with construction would cease. During construction, where a Strategic Plan project is located near noise and vibration sensitive receptors, mitigation measures NOI-1 through NOI-5 would be implemented. Mitigation measure NOI-1 requires the Watermaster Party proposing a project, or its construction contractor, prepare a focused construction noise and vibration mitigation plan for short term implementation. Mitigation measure NOI-5 is specific to the generation of vibration where a focused construction vibration mitigation plan must be prepared and implemented if vibration generating construction activities are within 25 feet (cities) or 50 feet (unincorporated County of Los Angeles) of occupied, sensitive receiver locations. Implementation of Noise mitigation measures would reduce project related noise impacts to less than significant levels and thus, would not contribute significantly to cumulative Noise impacts.

Likewise, during operation of wells and treatment facilities, implementation of mitigation measure NOI-6 for operational noise abatement at well sites and treatment facilities would reduce potential operational noise levels received at nearby sensitive receiver locations. For Project

Category 2 projects, these consist largely of passive recharge basins that during operation would not generate noise at levels that would contribute to a cumulatively significant impact. The exception is the SASG recharge basin project where one new source of supplemental water for recharge is to receive reclaimed water from the Pomona WTP through a pipeline that would require booster pumps to bring this water from a lower elevation to a higher elevation. Implementation of mitigation measure NOI-6 may be required to ensure such activities do not result in the generation of noise in exceedance of the city of Claremont Noise Ordinance. Therefore, with implementation of mitigation measure NOI-6, operation of Strategic Plan projects would not contribute to a cumulatively significant noise impact.

Conclusions: TVMWD finds that because implementation of the Strategic Plan and related projects would not expose people to excessive noise or vibration levels during construction or operation with implementation of mitigation measures NOI-1 through NOI-6. The project's contribution to cumulative impacts on exposure of people to excessive noise and vibration would not be cumulatively considerable, and thus would result in no significant cumulative impact.

I.12 Population/Housing

Findings: Less Than Significant Impact

Facts: Because there would be no impacts on Population and Housing associated with the implementation of the Strategic Plan and its related projects, no cumulative impacts would be created. Therefore, the potential for the implementation of the Strategic Plan and related projects would not contribute to a cumulative impact on Population and Housing.

Conclusions: TVMWD finds that because there are no new permanent employees associated with implementation of the Strategic Plan or related projects, there would be no significant contribution to cumulative impacts on Population and Housing.

I.13 Public Services/Recreation

Findings: Less Than Significant with Mitigation Incorporated

Facts:

Public Services

The cumulative analysis for impacts to public services involves the projected growth in the Six Basins project area. The project area includes the cities of Claremont, La Verne, Pomona and Upland, the unincorporated community of San Antonio Heights, and four small County islands within the cities of Claremont, La Verne and Pomona. The Six Basins project area is relatively built out with urban use.

Section 4.12, *Population and Housing* describes existing population and future population growth in the project area. Between 2000 and 2018, population increases in the cities overlying the Six Basins grew an average of 5.8 percent. SCAG has projected that growth in the project area would increase by approximately 8 percent through 2040 in the project area (coincidently, the Strategic Plan horizon year). This relatively slow rate of growth over a 20-year period is in part because the project area has been urbanizing over time so that opportunities to build new housing and non-residential land uses on vacant land have become scarcer. There may be opportunities to

increase density or intensity of uses through the revitalization or redevelopment of existing sites, however, this is speculative at this time.

Assuming that some cumulative development will occur, either through the development of remaining vacant properties or the revitalization or redevelopment of existing sites, the project area would experience an increase in the demand for fire and police protection services, including new equipment and personnel, or new facilities. Depending on the location of new facilities there could be significant impacts associated with construction and operation. Because the need for and/or location of any new facilities are unknown, impacts associated with these facilities are speculative. To err on the side of caution, it is assumed that cumulative development could result in significant environmental impacts on police or fire protection services or require development of additional facilities. However, because implementation of the Strategic Plan and related projects would not result in an increase in demand for police and fire services (i.e., no increase in residents or employees), implementation of the Strategic Plan and its related projects would not contribute cumulatively to the need for new police and fire services.

Parks/Recreation

Because implementation of the Strategic Plan would not result in impacts to Recreation or Recreational Facilities, the proposed project would not contribute to any cumulative impacts on Recreation or Recreational Facilities. With regard to the County's proposed San Antonio Creek Trail, this is currently not a project being pursued by the County and identifying the trail on a 2007 General Plan map does not constitute a project under CEQA. Therefore, implementation of the Strategic Plan and related projects would not contribute to a cumulative impact on Parks and Recreation.

Conclusions: TVMWD finds that because implementation of the Strategic Plan and related projects would not result in an increase in demand for police and fire services (i.e., no increase in residents or employees), implementation of the Strategic Plan and its related projects would not contribute cumulatively to the need for new police and fire services or an increase in the use of parks and recreation facilities.

I.14 Transportation

Findings: Less Than Significant Impact with Mitigation Incorporated

Facts: Implementation of mitigation measures TR-1 through TR-3 would ensure that impacts associated with project-related construction activities, or basin maintenance activities would be less than significant. These measures call for the development and implementation of construction traffic management plans during construction as well as when maintenance activities would require such a planning effort. Due to the nature of the proposed Strategic Plan projects, operation of the various projects ranging from groundwater production wells, monitoring wells, treatment facilities, water pipelines and spreading grounds generate minimal traffic at project sites as there are no permanent residents or employees associated with these activities.

Conclusions: TVMWD finds that because under future conditions when all projects are operational vehicle trips and vehicle miles traveled would be negligible (no permanent residents or employees), implementation of the Strategic Plan and related projects would not contribute to cumulative impacts on transportation and traffic circulation.

I.15 Utilities/Service Systems

Findings: Less Than Significant with Mitigation Incorporated

Facts:

Wastewater Treatment

Future cumulative development in the Six Basins project area could exceed wastewater treatment requirements of the Los Angeles RWQCB and Santa Ana River RWQCB potentially resulting in cumulatively significant impact on wastewater treatment facilities. However, because the Strategic Plan and related projects does not include any new residential, commercial, industrial, or institutional uses that would generate new residents or employees, implementation would result in no impacts or less than significant impacts. Therefore, improvements to or development of new water supply/water quality projects in the Six Basins project area would not contribute to cumulative impacts.

Water Treatment

The intent of the Strategic Plan and related projects is to increase the reliability and sustainability of the water resources in the Six Basins project area. Implementation of the Strategic Plan includes the rehabilitation of existing wells and water treatment facilities; the development of additional groundwater recharge basins; and the development of a new water treatment facility, up to 12 new groundwater production wells and interconnects between the new wells and the new treatment facility or existing facilities (e.g. Pomona's P-20 well connected to TVMWD's Miramar WTP), an interconnect between the Pomona WRP and the new SASG recharge basins, and additional interconnects between agencies. Therefore, improvements to or development of new water supply/water quality projects in the Six Basins project area would not contribute to cumulative impacts.

Stormwater/Drainage

Future cumulative development within the Six Basins project area would increase the quantity of stormwater generated on impervious urban sites. Project Categories 1 and 3 would result in a slight increase in the amount of impervious surfaces where new well sites and the new treatment facility would be located, that could contribute to a cumulative increase ins stormwater runoff. However, most of the sites would be small and where sites are greater than an acre, the footprint of the project would be less than an acre. Mitigation measures for the control of stormwater from a Strategic Plan project site (HWQ-2 and HWQ-3) would reduce a project's impact on the local and regional storm drain system to a less than significant level and would not significantly contribute to the cumulative need for the construction of new and/or expanded stormwater drainage facilities.

Project Category 2 projects would increase the size of existing recharge basins or create new recharge basins, designed to retain, and percolate stormwater, supplemental water, or recycled water. None of these projects would result in the creation of new impervious surfaces that could adversely affect stormwater runoff volumes. Therefore, projects in this category would not contribute to a significant cumulative impact.

Landfill Capacity

Solid waste generated during construction of the proposed Strategic Plan projects would mainly consist of small quantities of general construction and demolition (C&D) debris such as concrete or asphalt (if construction requires the removal of pavement to develop new treatment facilities), cardboard and wrapping material, worker personal waste (food wrappers, newspapers), and possibly green waste and excavated soils.

The California Green Building Standards Code (CGBSC) requires the implementation of a Construction Waste Management Plan that results in the recycling and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste generated by a construction project. Mitigation measure USS-2 has been identified that requires a construction contractor to submit a C&D disposal plan to a city Public Works Department for review and approval, that identifies the C&D waste to be diverted from a landfill, and a facility where the C&D waste will be taken. Implementation of a site-specific C&D Disposal Plan would ensure that this impact would be less than significant. Therefore, proposed Strategic Plan projects would not contribute significantly to a cumulative impact on landfill capacity.

During operation, the generation of solid waste would be minimal as most site visits would be for inspection only. Periodic maintenance may result in the generation of small amounts of material such as cardboard or other wrapping materials. This material would be taken off-site to a Watermaster Parties' corporate yard, of construction contractor's yard to be recycled along with other recyclable material in a recycling bin. Therefore, proposed Strategic Plan projects would not contribute significantly to a cumulative impact on landfill capacity.

Energy

CEQA Guidelines Section 15126.2(b) requires that a lead agency evaluate a project's energy use and provided guidance in *CEQA Guidelines* Appendix F. If the analysis of a project's energy use concludes that the project may result in significant environmental effects due to wasteful, inefficient, or unnecessary consumption use of energy, or wasteful use of energy resources, effects must be mitigated. The analysis should include the project's energy use for all project phases and components, including transportation-related energy, during construction and operation. An Energy Analysis was prepared for the Program EIR that is included in Appendix H. Section 4.15, *Utilities/Service Systems/Energy*, includes an evaluation of energy use during construction and operation of Strategic Plan projects. The conclusion of the Energy Analysis is that implementation of the Strategic Plan and related projects would not result in any significant environmental effects due to wasteful, inefficient, or unnecessary consumption use of energy, or wasteful use of energy resources. Therefore, construction and operation of Strategic Plan projects would not result in a potential cumulative impact due to wasteful, inefficient, or unnecessary consumption of energy resources, and no construction-related energy impact would occur.

Conclusions: TVMWD finds that implementation of the Six Basins Strategic Plan and related projects would not contribute to a cumulatively significant impact on Utilities and Service Systems, or Energy Consumption with the implementation of mitigation measures identified in Draft PEIR Section 4.3, *Air Quality*; Section 4.7, *Geology/Soils/Paleontological Resources/Mineral Resources*, Section 4.8, *Hazards/Hazardous Materials. Airport Safety/Wildfire*; and Section 4.9. *Hydrology and Water Quality*; and Section 4.15, Utilities/Service Systems/Energy.

J. FINDINGS FOR GROWTH INDUCING IMPACTS

CEQA Guidelines Section 15126.2(d) require that an EIR discuss the potential growth-inducing impacts of a proposed project. The CEQA Guidelines provide the following guidance for such discussion:

> *"Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment."*

An example of direct growth inducement is if a project would result in the construction of new housing. A project could have indirect growth-inducement potential if it would establish substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental land uses) or if it would involve a substantial construction effort with substantial short-term employment opportunities such as the construction of a new freeway or freeway interchange, and indirectly stimulate the need for additional housing and services to support the new employment demand. In addition, a project could indirectly induce growth if it would remove an obstacle to additional growth and development, such as the extension of a road, potable water line or sewer line.

Table 3-2 in Chapter 3, *Project Description*, provides a complete list of the goals, impediments, and actions for successful implementation of the Strategic Plan, outlines the Strategic Plan goals, impediments to the goals, actions to remove the impediments, and the implications of taking such actions. Implementation of the Strategic Plan would result in changes in the current management of the Six Basins, improvements to existing facilities, and development of new facilities. Each project has elements of storage and yield management, recharge management and water quality management, and will require new monitoring for both design and implementation. Achievement of the Strategic Plan goals would result in the long-term sustainability (considering current use and future availability) of the water supply and the quality of that resource in order to guarantee a safe supply of potable water for the residential, commercial and industrial water users in the future. Therefore, although implementation of the proposed Strategic Plan would result in a more sustainable water supply for future water users, it would not directly or indirectly induce growth not already planned through the general plans of the cities overlying the Six Basins project area.

K. FINDINGS REGARDING ALTERNATIVES

CEQA Guidelines Section 15126.6(b) states that because an EIR must identify ways to mitigate or avoid significant environmental effects of a project, the analysis of alternatives shall focus on alternatives that are capable of avoiding or substantially lessening one or more significant environmental effects. In addition, Section 15126.6(c) states that an EIR must explain the rationale for selecting the alternatives to be evaluated and identify alternatives that were considered but rejected. Further, the lead agency is required to explain the reasons for rejecting alternatives (CEQA Guidelines, Section 15126.6(f)(1)).

Alternatives to the Strategic Plan, including the Baseline (No Project) Alternative were evaluated in the *Draft Memorandum – Development and Evaluation of Conjunctive Water Management Alternatives to Support the Program Environmental Impact Report (PEIR) for the Strategic Plan of the Six Basins*. A copy of this document along with a copy of the Strategic Plan are included in Appendix I of this Program EIR.

The Baseline Alternative and three conjunctive water management (CWM) alternatives were selected for detailed analysis to determine how each alternative would affect groundwater hydrology in the Six Basins over the continuation of existing operating activities (Baseline Alternative).

The CEQA analysis of alternatives then compares the Baseline Alternative, Alternative CWM-1 and Alternative CWM-3 to the Strategic Plan (Alternative CWM-2) to determine how each of the alternatives would avoid or lessen the significant environmental effects of the Strategic Plan program (Alternative CWM-2), while attaining most of the Strategic Plan's goals and objectives. There were a number of significant impacts identified in Chapter 4, *Environmental Impact Analysis*, however, mitigation measures have been identified that would reduce these impacts to less than significant levels. Table ES-2 in Chapter ES, *Executive Summary*, is a summary matrix of environmental impacts, proposed mitigation measures. and the level of significance of the impact after mitigation has been implemented.

The following sections provide a general description of each alternative, its ability to meet the program objectives, and a qualitative discussion of its comparative environmental impacts. As provided in Section 15126.6(d) of the CEQA Guidelines, the significant effects of these alternatives are identified in less detail than the analysis of the Strategic Plan program in Chapter 4.

K.1 Alternative Considered and Rejected

One alternative, an alternative location to the new recharge basin at the SASG was considered and rejected. This alternative was requested by the California Department of Fish and Wildlife (CDFW) to reduce the potentially significant impacts associated with the development of a new recharge basin in an area of the SASG heavily vegetated with Riversidian Alluvial Fan Sage Scrub (RAFFS). Figure ES-2 in DPEIR Chapter 2, *Existing Conditions*, shows the regional location of the Six Basins project area including a number of existing man-made features in the SASG such as the San Antonio Dam, LACFCD spreading grounds, SAWCo spreading grounds, San Antonio Creek channel, and the four existing aggregate mine pits that are a part of the larger Holiday Rock Foothill mine site. Currently, Pit 6 is not being excavated and there may be an opportunity to utilize that pit for groundwater recharge. However, this alternative site was rejected from consideration for the following reasons:

- Although no mining is currently conducted in this pit, there is an opportunity for the mine operator, Holliday Rock, to recommence mining by breaching the wall between pits 5 (active mine site) and 6 to recover the material. This would allow the operator to continue mining and conveying the material for processing to the existing Foothill Plant, located south of Baseline Road.
- Because Pit 6 is inactive but not closed/reclaimed, utilizing it for stormwater recharge and supplemental (recycled) water recharge would preclude the site from being used for its intended purpose.

- In the future, when excavation of aggregate material from these pits is completed, the site would be reclaimed by the operator and would revert back to PVPA to be used for groundwater recharge. However, this scenario is not anticipated to occur for several years, and it is the Watermaster's intention to implement the Strategic Plan, including the development of a new recharge basin at the SASG in the reasonably foreseeable future.

K.2 Alternatives Considered for Evaluation

Table 9 lists the project by Project ID number which correspond to the locations identified on Figure ES-4 in DPEIR Chapter ES, *Executive Summary*. Note: projects identified in Category 4 are not included on Figure ES-4 because this category of projects includes the development and implementation of groundwater monitoring programs to support the design of new wells and treatment facilities (Project Categories 1 and 3). New wells associated with monitoring programs was evaluated as Project Category 3 projects (Project Category 3).

The location of any new monitoring wells is unknown at this time. Future projects that may be identified during well siting investigations for example but are not a part of the current list of Strategic Plan projects, would be subject to separate environmental review, that may be tiered from the Six Basins Strategic Plan Program EIR or in a stand-alone CEQA document.

Alternatives evaluated for the Program EIR include the Baseline (No Project) Alternative, and three Conjunctive Water Management Plan alternatives, including the Strategic Plan. Table 9 lists the projects identified in the Strategic Plan and shows which projects would be developed under each alternative. The Baseline Alternative is the No Project Alternative where Watermaster Parties would continue with existing programs with no implementation of the Strategic Plan.

For the purposes of the evaluation of alternatives, implementation of the Strategic Plan is identified in Table ES-3 as Conjunctive Water Management Alternative 2 (CWM-2). The other alternatives include the Baseline (No Project) Alternative, Alternative CWM-1 – Project Category 1 and Project Category 3 projects only, and Alternative CWM-3 which all Strategic Plan projects plus additional MS4 projects in urban areas to collect stormwater from surface streets for treatment and groundwater recharge.

Evaluation of Alternatives for Potential Groundwater Hydrologic Impacts

There were two analyses of alternatives conducted for the Six Basins Program EIR. The first was to evaluate the three CWM alternatives against the Baseline Alternative in order to determine the severity of impacts each might have on groundwater hydrology. The project engineer used the Six Basins groundwater-flow model to simulate the hydrologic response of the Baseline and the three CWM alternatives over a long-term hydrologic period and compared and contrasted the model-simulation results. The planning period was constant between the alternatives and was defined as July 2017 to June 2075, and it assumes a variable hydrology based on the historical precipitation from 1960 to 2017.

PID[1]	Descriptions[2]	Strategic Plan (Alternative CWM-2)	Baseline Alternative	Alternative CWM-1	Alternative CWM-3
Pump and Treat[2]					
a	Pomona Reservoir 5	X	--	X	X
b	La Verne Lincoln/Mills	X	--	X	X
c	Del Monte 4	X	--	X	X
d	La Verne Old Baldy	X	--		X
e	Durward 2	X	--		X
Recharge Improvements					
f	Enhance Stormwater Recharge at the SASG	X	--	--	X
g[3]	Enhance Supplemental-Water Recharge at the SASG	X	--	--	X
h[4]	Enhance Stormwater Recharge at the TCSG	X	--	--	X
i	Supplemental-Water Recharge at the TCSG	X	--	--	X
j[5]	Enhance Stormwater Recharge at the PSG	X	--	--	X
k[6]	Recharge Stormwater/Supplemental Water at the LA County Fairplex	X	--	--	X
n	Enhance Stormwater Recharge through MS4 Compliance		--	--	X
~~o~~[7]	~~Create a Conservation Pool Behind San Antonio Dam~~	--	--	--	--
Temporary Surplus					
l[8]	Construct Interconnections between water supply agencies	X	--	--	X
m[9]	Rehabilitate P-20 and a Wellhead Treatment Facility	X	--	--	X
p[10]	Construct New Production Wells	X	--	--	X

Source: Wildermuth Environmental, Inc., Final Strategic Plan for the Six Basins, November 2017, Table 6-2, and Wildermuth Environmental, Inc., Draft Memorandum of Alternatives, November 220, Table 6.

Notes:

1. Project Identification Number.
2. Pump and Treat projects will be carried out at existing well sites and/or treatment facilities. No new site disturbance is anticipated through the physical expansion of a well site or treatment facility. Existing unused pumping capacity was assumed at these wells.
3. Potential area of disturbance to develop the new recharge basin in the SASG is 50 acres to a depth of up to 200 feet to capture additional stormwater for groundwater recharge. The new basin would also recharge recycled water from the Pomona Water Treatment Plant delivered through a newly constructed pipeline of up to 68,000 linear feet (see item 8 below).
4. Potential area of disturbance to expand the TCSG is 25 acres to a depth of up to 20 feet.
5. Potential area of disturbance to expand the Pedley Spreading Grounds is 6 acres to a depth of up to 10 feet. Note: Improvements at the PSG site are also a part of the MS4 Compliance group of projects.
6. Potential area of disturbance to create the new Fairplex underground infiltration gallery is 10 acres to a depth of up to 10 feet. Note: Improvements at the Fairplex site are also a part of the MS4 Compliance group of projects.
7. Pipe sizes ranging from 8" to 20" in diameter. Includes a new, approximately 68,000 linear foot pipeline between the Pomona Water Treatment Plant and the new SASG recharge basin.
8. The P-20 well site is currently shut down due to groundwater quality issues. This project would rehabilitate this well and construct new treatment facilities to reduce nitrate concentrations in the produced water

9. Construction of new production wells is assumed to disturb up to 0.5 acre per well site (includes well site and site access.

The hydrologic responses and the potential impacts that were evaluated included:

Chronic Lowering of Groundwater Levels. Chronic lowering of groundwater levels refers to groundwater levels that decline through the planning period indicating that, on average, discharge exceeds recharge. In other words, chronic lowering of groundwater levels indicates overdraft, and is an undesirable impact

Threat of High Groundwater. Historically, high groundwater problems have occurred in the City of Claremont, in the active sand and gravel mining pits on the eastside of the San Antonio Spreading Grounds (SASG), and within the City of Pomona in the Palomares Cienega. High groundwater is problematic because it can (1) impact infrastructure through flooding, (2) reduce the yield of the Six Basins by increasing outflow from the Six Basins and/or limiting the volume of stormwater recharge that can occur during wet periods, and (3) cause liquefaction hazards during earthquakes.

Pumping Sustainability at Wells. This is the ability to pump water from a specific well at a desired production rate, given the groundwater level at that well, its specific well construction, and current equipment details.

Groundwater production at a well is presumed to be sustainable if the model-projected groundwater level at that well is greater than the sustainability metric. The increases and decreases in groundwater levels may impact the Parties in the basin disproportionately. Pumping sustainability becomes a concern if the groundwater levels fall below the sustainability metric at the Parties' wells when the stored water is removed.

Developed Yield. This is the annual average yield that was pumped from the basin over a finite period of time but is corrected for the change in groundwater storage and the volume of supplemental water recharge that occurred during the period. The developed yield is reflective of the hydrology and water management practices of that period. Developed yield is a key factor in the calculation of the Operating Safe Yield (OSY) of the Six Basins, and therefore a reduction in developed yield would cause a reduction on the OSY.

Subsurface Outflow from the Six Basins to the Chino Basin. Subsurface outflow to the Chino Basin occurs across the San Jose Fault. An increase in subsurface outflow to the Chino Basin suggests a loss of developed yield for the Six Basins. A decrease in subsurface outflow to the Chino Basin could be a significant impact to the beneficial uses and users.

The results of the groundwater modeling for each of the project alternatives including the proposed Strategic Plan program (Alternative CWM-2) were that each of the alternatives is physically feasible based on the model-estimated hydrologic responses and the potential adverse impacts defined above. Implementation of any of the alternatives would improve the water-supply reliability of the Six Basins Parties by (1) providing an additional local groundwater supply during dry periods through the operation of a dry-year storage account and (2) increasing the yield of the basin. Finally, the alternatives maximize the use of local resources during wet periods by implementing a temporary surplus. The potential for adverse hydrologic impacts associated with the alternatives were found to be less than significant.

Threat of High Groundwater. Each of the alternatives is projected to decrease the threat of high groundwater in the Six Basins relative to the Baseline alternative due to lower groundwater levels and reduced occurrences of high groundwater.

Pumping Sustainability. None of the alternatives are projected to cause greater pumping sustainability impacts relative to the Baseline alternative.

Chronic Lowering of Groundwater Levels. Each of the alternatives is projected to result in lower groundwater levels compared to the Baseline, but in no alternative is there evidence of chronic lowering of groundwater levels that would indicate a persistent state of overdraft.

Developed Yield. Each of the alternatives is projected to result in an increase in developed yield relative to the Baseline alternative.

Subsurface Outflow to the Chino Basin. Each of the alternatives is projected to result in no change in subsurface outflow to the Chino Basin relative to the Baseline alternative.

Watermaster conducts comprehensive groundwater-level monitoring and modeling that would continue through the planning period (2017-2075) in order to identify rising or lowering of groundwater levels that may adversely affect pumping sustainability, developed yield or the change in subsurface outflow to the Chino Basin. As part of the monitoring and modeling program (Project Category 4) measures to modify puts and takes or increase or decrease supplemental water recharge.

K.3 CEQA Evaluation of Alternatives

The Baseline Alternative and three CWM alternatives were selected for detailed analysis. Implementation of the proposed Strategic Plan was evaluated as Alternative CWM-2. The goal for evaluating these alternatives is to identify alternatives that would avoid or lessen the significant environmental effects of the Strategic Plan program, while attaining most of the Strategic Plan's goals and objectives. There were a number of significant impacts identified in Chapter 4, *Environmental Impact Analysis*, however, mitigation measures have been identified that would reduce these impacts to less than significant levels. Table 10 provides a comparison between the Baseline (No Project) Alternative, the Strategic Plan (Alternative CWM-2) and two additional alternatives.

Table 10 Summary of Alternatives and Environmental Impacts

Environmental Topic	Strategic Plan (Alternative CWM-2)	Baseline Alternative	Alternative CWM-1	Alternative CWM-3
Aesthetics	LTSM	NI	Less	Similar
Agricultural/Forestry Resources	NI	NI	NI	NI
Air Quality	LTSM	Less	Less	Similar
Biological Resources	LTSM	NI	Less	Similar
Cultural/Tribal Cultural Resources	LTSM	NI	Less	Similar
Energy	LTSM	Less	Less	Similar
Environmental Justice	LTSM	NI	Similar	Similar
Geology/Soils	LTSM	NI	Less	Similar
Greenhouse Gas Emissions	LTSM	Less	Less	Similar
Hazards/ Hazardous Materials	LTSM	Less	Less	Similar

Hydrology/Water Quality	LTSM	NI	Less	Similar
Land Use/Planning	LTS	NI	Less	Similar
Mineral Resources	LTS	NI	Less	Similar
Noise and Vibration	LTSM	Less	Less	Similar
Paleontological Resources	LTSM	NI	Less	Similar
Population/Housing	NI	NI	NI	NI
Public Services	LTSM	Less	Similar	Similar
Recreation	NI	NI	NI	NI
Transportation	LTSM	Less	Similar	Similar
Utilities/Service Systems	LTSM	Less	Less	Similar
Wildfire	LTSM	Less	Less	Similar
Secondary Effects/ Growth Inducement	LTSM	Less	Similar	Similar

Source: *Six Basins Program EIR, March 2021, Chapter 4, Environmental Impact Evaluation, and Chapter 6, Alternatives.*

Notes: LTS= Less than Significant; LTSM = Less than Significant with Mitigation Incorporated; NI = No Impact; SU= Significant and Unavoidable

An additional impact was identified in Chapter 5, *Other CEQA Sections*. This impact is the potential for a more stable and sustainable water supply to be Growth Inducing. Implementation of the proposed Strategic Plan or one of the two other CWM alternatives is not considered to be growth inducing because a CWM program would result in a more stable and sustainable water supply for existing and future customers, it would not result in a direct or indirect increase in population or employment s in the Six Basins project area. Additional water supply would play a role in supporting additional growth within the Six Basins project area, but it would not be the single impetus to such growth.

Baseline Alternative

For the Strategic Plan program, the Baseline Alternative is the No-Project Alternative. Table 10 provides a comparison between the Strategic Plan (Alternative CWM-2), the Baseline Alternative, and the two other CWM alternatives. As shown in this table, the evaluation of the Baseline Alternative identified the following:

No Impact. There would be no impact associated with Aesthetics, Agricultural/Forestry Resources, Cultural/Tribal Cultural Resources, Geology/Soils, Land Use/Planning, Mineral Resources, Paleontological Resources, Population/Housing. and Recreation, Wildfire Hazards. This is because under this alternative there would be no disturbance at any existing or proposed project sites that would result in a potential impact.

Less Impact. There would be less impacts associated with Air Quality, Energy, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Noise and Vibration, Public Services, and Utilities and Service Systems. Although no new projects would be developed under the Baseline Alternative, operation of existing facilities use energy, generate some noise and vibration, and generate some emissions associated with vehicle trips to sites for operation/maintenance activities.

Similar Impact. No impacts similar to those generated by the implementation of the Strategic Plan program would occur.

Greater Impact. Implementation of the Baseline Alternative would have a greater impact associated with Environmental Justice and Hazards/Hazardous Materials associated with the lost opportunity to maximize Project Category 1 projects in the Pomona Basin, that would increase the efforts to pump and treat groundwater that has been contaminated by past industrial uses.

Alternative CWM-1

As shown in Table 10, the evaluation of Alternative CWM-1 showed the following.

No Impact. There would be no impact associated with Agricultural/Forestry Resources, Population/Housing, and Recreation, Wildfire Hazards. The conclusion was similar for the proposed Strategic Plan, with the exception of Wildfire Hazards. Hazards associated with wildfires are related to development of new recharge basins in the SASG and TCSG where sites are located within areas near the foothills where vegetation is subject to wildfires.

Less Impact. There would be less impacts associated with Aesthetics, Air Quality, Biological Resources, Cultural and Tribal Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise and Vibration, Public Services, Utilities and Service Systems, Wildfire. The conclusion is based on the reduced number of projects that would be implemented with Alternative CWM-1 when compared to the Strategic Plan.

Similar Impact. Impacts that would be similar include Environmental Justice, Public Services and Transportation generally related to the ability of public service providers to adequately carry out Emergency Response Plans in areas where construction projects may require temporary street closures or detours. These impacts can be reduced to less than significant impacts with the development and implementation of Construction Traffic Management Plans.

Greater Impact. Implementation of the Alternative CWM-1 would not result in greater impacts than those associated with the Strategic Plan program.

Alternative CWM-3

This alternative includes development of all projects identified in the Strategic Plan and an additional six MS4 projects. There are eight MS4 projects identified in the report on MS4 projects (Appendix I.3), however two – improvements at the Pedley Spreading Grounds and the Fairplex site are included in the Strategic Plan. The analysis of this alternative showed that impacts would be similar to the Strategic Plan program (Alternative CWM-2) with the exception of impacts to Biological Resources. This is because implementation of Alternative CWM-3 may result in a significant impact to downstream habitat or special status species because stormwater currently flowing in channels to downstream location would be diverted to groundwater recharge facilities through future MS4 projects, resulting in a loss of water that may be assisting in the effort to maintain the viability of habitat downstream. This would be determined as each new project is evaluated in a project specific subsequent CEQA document. Therefore, impacts associated with the implementation of Alternative CWM-3 may be greater with regard to Biological Resources.

K.4 Environmentally Superior Alternative

In evaluating alternatives to a project, CEQA requires that an EIR identify an environmentally superior alternative. Often the No-Project Alternative is the environmentally superior alternative

because it generally represents no new impacts to the environment. CEQA Guidelines Section 15126.6(e)(2) states that … *If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives*.

The environmental superior alternative is Alternative CWM-1. The analysis found that this alternative would achieve most of the Watermaster Parties goals with similar or less impact than the Strategic Plan program (Alternative CWM-2).

L SUMMARY OF STRATEGIC PLAN BENEFITS

The Six Basins Strategic Plan identified a number of issues facing the Watermaster Parties in their management of groundwater and surface water resources. These are:

- The climate of the region is such that the Six Basins area is subject to prolonged dry periods. In years when precipitation is below average, the volumes of surface-water runoff that are available for artificial recharge at spreading grounds in the Six Basins are small, so the facilities for artificial recharge go largely un-utilized.
- The facilities to divert and recharge stormwater runoff do not capture all the runoff that is available. Stormwater runoff that bypasses the spreading grounds is a loss of a low-cost, high-quality water resource.
- The current methods and protocols being employed by the US Army Corps of Engineers (USACE), Los Angeles County Flood Control District (LACFCD), and the Pomona Valley Protective Association (PVPA) to monitor the surface-water resources may not be returning accurate data for surface-water discharges and diversions. The completeness and accuracy of these data are crucial to the development and implementation of programs to improve basin management.

Implementation of the Strategic Plan would have the following benefits to the Watermaster Parties and the customers they serve.

1. *New yield*. Increasing recharge to the Six Basins will increase the yield of the groundwater basin. Water recharge improvements include increasing the recharge capacity by enlarging the basins at the TCSG and PSG sites, developing an additional recharge basin in the SASG, developing a new underground infiltration gallery at the Los Angeles County Fairplex site. These projects will result in new yield by increasing the ability of these spreading grounds to capture additional surface water flows when they are available.
2. *Dry year supply*. The implementation of a storage and recovery program will increase the reliability of water supplies during dry periods.
3. *Production sustainability*. Increasing recharge to the Six Basins will increase water levels resulting in production sustainability.
4. *Increased water supply reliability*. The Strategic Plan would enable the Parties to maximize the use of local water source in a sustainable way. Groundwater well rehabilitation and new water treatment plants at existing well sites in the Pomona, Lower Claremont and Ganesha basins would result in sustainability of groundwater production and enhanced reliability of the water supply during dry years.

5. *Mitigated high groundwater*. The Strategic Plan would enable the Parties to reduce the potential risk of rising groundwater in the Six Basins through additional pumping in the Upper Claremont Heights basin.
6. *Water quality improvements*. The Strategic Plan would encourage the expansion of treatment which will improve groundwater quality in the Six Basins, and the increased recharge of high-quality water.
7. *Improved basin management*. The Strategic Plan was specifically developed to enhance the management of the Six Basins beyond the execution of the Judgment.
8. *Improved basin knowledge*. The Strategic Plan monitoring program will improve the knowledge of the Six Basins hydrogeology. Expanding the groundwater and surface water monitoring programs would allow the Watermaster Parties to increase monitoring activities in areas of high groundwater as well as the water quality in the basins where groundwater production occurs.
9. *Climate change resiliency*. The Strategic Plan would (1) create additional storage capacity for stormwater capture for larger storm events expected due to climate change; and (2) enable the Parties to maximize the use of local water source, which are more reliable.
10. *Regional collaboration*. The Strategic Plan enables the collaboration of the Six Basins Parties and others to manage the Six Basins sustainably while providing increased water supply reliability.

FINAL PROGRAM EIR
FOR THE SIX BASINS STRATEGIC PLAN
(State Clearinghouse No. 2018091020)

Prepared for:

Three Valley Municipal Water District
1021 Miramar Avenue, Claremont, CA 91711
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Prepared By:

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October 2021

Table of Contents

FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

List of Figures (figures are located at the end of Response to CDFW Comment Letter)

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1.0 Introduction

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15088, Three Valleys Municipal Water District (TVMWD) (Lead Agency) has evaluated the comments received on the Six Basins Strategic Plan Draft Program Environmental Impact Report (Draft Program EIR) (SCH No. 2018091020). Pursuant to CEQA Guidelines Section 15132, this Final EIR includes a list of persons, organizations, and agencies that provided comments on the Draft Program EIR; responses to the comments received regarding the Draft Program EIR; and errata, or revisions to the Draft Program EIR; as well as a Mitigation Monitoring and Reporting Program (MMRP) for use by TVMWD and other Watermaster Parties who would use the Program EIR to evaluate subsequent projects.

This document is organized into three sections:

- *Chapter 1—Introduction*. Provides an introduction to the Final EIR.
- *Chapter 2—Responses to Written Comments*. Provides a list of the agencies, organizations, and individuals who commented on the Draft EIR. Copies of all of the letters received regarding the Draft EIR and responses thereto are included in this section.
- *Chapter 3—Errata*. Includes a listing refinements and clarifications on the Draft EIR, which have been incorporated.

The Final Program EIR also includes the following under separate cover

- Draft Program EIR
- Draft Program EIR Appendices
- Mitigation Monitoring and Reporting Programs

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2.0 Responses to Comments

2.1 List of Authors

A list of public agencies, organizations, and individuals that provided comments on the Six Basins Strategic Plan Draft Program Environmental Impact Report (Draft EIR) during the 60-day public comment period between January 4, 2021, and April 2, 2021, is presented below. Each comment has been assigned a code. Individual comments within each communication have been numbered so comments can be crossed-referenced with responses. Following this list, the text of the communication is reprinted and followed by the corresponding response.

State Agencies

Organizations

2.2 Responses to Comments

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15088, TVMWD, as the Lead Agency, evaluated the comments received on the Draft Program EIR (State Clearinghouse No. 2018091020) for the Six Basins Strategic Plan (proposed Plan), and has prepared the following responses to the comments received. This Response to Comments document becomes part of the Final Program EIR for the proposed project in accordance with CEQA Guidelines Section 15132.

Comment Letters and Responses

The comment letters reproduced in the following pages follow the same organization as used in the List of Authors.

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DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

Letter 1

July 28, 2021

Ben Peralta
Three Valleys Municipal Water District
1021 Miramar Avenue
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bperalta@tvmwd.com

Subject: Six Basins Strategic Plan, Draft Program Environmental Impact Report, SCH #2018091020, Three Valley Municipal Water District, Los Angeles County

Dear Mr. Peralta,

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Program Environmental Impact Report (DPEIR) and associated documentation, *Biological Resources Assessment* (BRA), from the Three Valley Municipal Water District (TVMD; Lead Agency) for the Six Basins Strategic Plan (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

1-1

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq*.). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

Project Description and Summary

Background: The Six Basins are six interconnected groundwater basins located along the base of the San Gabriel Mountains. The basins are Canyon Basin, Upper Claremont Heights Basin (UCHB), Lower Claremont Heights Basin (LCHB), Pomona Basin, Live Oak Basin and Ganesha Basin. The limits of the Six Basins area are the San Gabriel Mountains to the north, the San Jose Hills to the south, the Main San Gabriel Basin to the west, and the Chino Basin to the east. The pumping and storage rights for the Six Basins were adjudicated in 1998 through a stipulated judgment (Judgment) titled "Southern California Water Company vs. City of La Verne, et al." in the Superior Court of California for the County of Los Angeles (Court)(Case No. KC029152). The Judgment prescribes a physical solution for the coordinated management of the Six Basins with the objective that the Parties to the Judgment can reliably pump their respective rights and maximize the beneficial use of groundwater. While the Court maintains continuing jurisdiction over the Judgment, the Judgment also established a Six Basins Watermaster to implement the physical solution.

Part of the solution was the establishment of a Safe Yield at 19,300 acre-feet per year (afy) and a Base Annual Production Right for each Party as a percentage of the Safe Yield. This was based on historical groundwater production for the period of 1985 through 1996 and a Safe Yield study developed by Camp Dresser McKee (CDM, 1996). Safe Yield is defined in the Judgment as "*the amount of groundwater, including Replenishment and return flows from imported water, that can reasonably be produced from the combined Two Basins and Four Basins Areas on an annual basis without causing an undesirable result*".

Although prior hydrologic and physical conditions limited the Safe Yield to 19,300 afy, through the coordinated and equitable management of the Six Basins, the Physical Solution of the Judgment establishes that an Operating Safe Yield (OSY), an Operating Plan, and Base Annual Production Rights can be established independently for the Four Basins (Canyon Basin, UCH, Lower Claremont Heights Basin, and Pomona Basin) and the Two Basins areas (Live Oak Basin and Ganesha Basin). The Two Basins are for the sole use of the City of La Verne. 1-2

Objective: The proposed Project is to construct and operate projects in a coordinated manner to optimize conjunctive water management activities in the Six Basins. This would be to increase the reliability of regional water supplies. Execution of the Strategic Plan would be accomplished through the implementation of a number of projects identified by the Watermaster Parties. Implementation includes two elements: 1) a planning/programming element consisting of the development of an updated Operating Plan; and 2) a physical element consisting of the construction of new facilities and/or improvements to existing facilities with on-going operation/maintenance of those facilities.

For the environmental evaluation of Strategic Plan implementation, including updating the Six Basins Watermaster Operating Plan, the projects to optimize conjunctive water management, were placed in four categories:

1. Pump and Treat Groundwater in the Pomona Basin –improvements to existing facilities to increase groundwater production and treatment capacity.
2. Recharge Improvements – enhancement of stormwater and supplemental water recharge.
3. Temporary Surplus – rehabilitation to the existing City of Pomona's P-20 wellhead and

treatment facility in the Lower Claremont Heights Basin (LCHB) and construction and operation/maintenance of new production wells and pipelines; and,

4. Monitoring Programs in Support of the Strategic plan – development and implementation of groundwater monitoring program to support the design of new wells and treatment facilities.

1-2 Con't

Location: The Six Basins are six interconnected groundwater basins located along the base of the San Gabriel Mountains. Regionally, the Six Basins underly a portion of the Eastern San Gabriel Valley in Los Angeles County, the City of Upland, and the unincorporated community of San Antonio Heights in western San Bernardino County. The Project area is an urbanized area along the base of the mountains. The basins are Canyon Basin, Upper Claremont Heights Basin (UCHB), Lower Claremont Heights Basin (LCHB), Pomona Basin, Live Oak Basin, and Ganesha Basin. The limits of the Six Basins area are the San Gabriel Mountains to the north, the San Jose Hills to the south, the Main San Gabriel Basin to the west, and the Chino Basin to the east.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist TVMWD in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring, and reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

Specific Comments

Comment #1: Groundwater Dependent Ecosystems

Issue: The Project may impact biological resources located in areas identified with groundwater dependent ecosystems (GDE). In addition, these ecosystems do not seem to be identified in the DPEIR.

Specific impacts: The Project may cause local extirpation of wildlife from otherwise suitable habitat through increasing pumping efforts and constructing recharge improvements facilities. The construction of these facilities may remove habitat and alter groundwater levels, significantly impacting GDEs.

1-3

Why impacts would occur: DWR's Natural Communities Commonly Associated with Groundwater Dataset identifies many potential GDEs in the Projects geographic boundary (DWR 2021). The potential GDEs identified likely comprise phreatophytic vegetation, which rely on water supply from the groundwater table. This vegetation is a critical contributor to habitat and forage for a wide range of species and can be sensitive to depth to groundwater threshold impacts (Naumburg et al. 2005, Froend and Sommer 2010). This sensitivity to groundwater level thresholds means that localized pumping and recharge actions altering groundwater levels (such as those proposed in the Project) can impact phreatophyte vegetation health. Both decreasing (drying out) or increasing (drowning) groundwater elevation has the potential to

stress phreatophytes depending on the plant species and the groundwater elevation and duration (e.g., short term wetness/dryness versus prolonged wetness/dryness).

New recharge basins are proposed within the San Antonio Creek Spreading Grounds (SASG) and the Thompson Creek Spreading Grounds (TCSG). DWR has identified the locations of these spreading grounds as GDEs. CDFW is concerned that the installation of new spreading grounds will not only remove GDEs but potentially increase groundwater elevation, negatively impacting surrounding GDE vegetation. In addition, new production and monitoring wells and new pipelines may be located within GDEs. Therefore, construction efforts associated with these projects may temporarily disturb or remove GDEs.

Evidence impacts would be significant: CDFW has a vested interest in the sustainable management of groundwater, as many sensitive ecosystems and resources are dependent on groundwater. The San Gabriel Valley Groundwater Basin is likely exempt from the Sustainable Groundwater Management Act (SGMA) requirements due to its majority adjudicated status. However, the Department of Water Resources (DWR) documented declining groundwater levels and potential for adverse impacts to streams and habitat in San Gabriel Valley Groundwater Basin attributable to groundwater pumping according to the SGMA Basin Prioritization (DWR 2020). Absent SGMA requirements for environmental considerations and protections, it is incumbent upon the Six Basins Watermaster to consider and manage for impacts to public trust resources, including GDEs and interconnected surface waters in the Project. Per CEQA Guidelines section 15065(a), a project may have a significant effect on biological resources if the project substantially reduces the habitat of a fish or wildlife species; threatens to eliminate a plant community; or has the potential to restrict the range of an endangered, rare, or threatened species. By impacting sites like GDEs without mitigation, the Project may have a significant effect on biological resources by further eliminating a plant community and reducing habitat for wildlife species.

1-3 Con't

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: CDFW recommends Project proponents conduct the following for individual subsequent projects: 1) determine which proposed project actions are most likely to impact GDEs, 2) deploy representative groundwater monitoring stations within GDEs to track groundwater levels and vegetation responses overtime, and 3) establish thresholds/triggers for adaptive management to respond to stressed vegetation as needed.

Mitigation Measure #2: There is potential that the proposed projects could benefit GDEs. For example, injection wells or new spreading grounds could increase groundwater levels, so it becomes more accessible to vegetation. This allows GDEs to persist or potentially expand. Through the use of the monitoring stations mentioned in the previous mitigation measure, they should be monitored for sustainable groundwater levels and the GDE response. If GDEs display a positive response to projects, then Project proponents should maintain groundwater management activities to allow GDEs to sustain that beneficial level.

Recommendation: The subsequent CEQA document should verify the GDE existence, identify vegetated communities (e.g., species compositions), and disclose associated rooting depths/optimal groundwater table elevations. This verification should be conducted for any area sited for individual subsequent projects.

Comment #2: California Fully Protected Bird Species

Issue: The Project may impact California Fully Protected bird species. According to Table 2 of the BRA, California black rail (*Laterallus jamaicensis coturniculus*), a California Fully Protected bird species, has potential to occur within the Project boundary. In addition, according to ebird, American peregrine falcon (*Falco peregrinus*) has been recorded multiple times within the Project boundary.

Specific impacts: Project construction and activities, directly or through habitat modification, may result in injury or mortality, reduced reproductive capacity, population declines, or local extirpation of these California Fully Protected bird species. Temporal or permanent loss of foraging, breeding, nesting, or nursery habitat may occur. In addition, diverting water from its current course may impact the availability of water for various bird species or habitats supporting birds, impacting the ability of Fully Protected species to persist within the Project boundary.

Why impacts would occur: Impacts to these species may occur as a result of ground-disturbing (e.g., staging, mobilization, demolition, and grading) activities, vegetation removal, increased human activity, noise disturbances, light, and dust. The Project proposes mitigation for nesting birds and raptors by having the biologist set "appropriate no-work buffers around the nest, which would be determined based on the nesting species, its sensitivity to disturbance, nesting stage and expected types, intensity and duration of disturbance." Buffers for birds and raptors may not be large enough to avoid impacts on nests of California Fully Protected birds. Moreover, the Project's proposed buffers only mitigates for impacts on nests, eggs, and nestlings during the bird/raptor breeding season. California Fully Protected species may not be taken at any time. Accordingly, an adequate mitigation plan would need to also avoid impacts on a California Fully Protected species during all life stages.

1-4

Evidence impact would be significant: The Project may result in adverse effects, either directly or through habitat modifications, on a California Fully Protected species. Take of any species designated as California Fully Protected under the Fish and Game Code is prohibited. CDFW cannot authorize the take of any California Fully Protected species as defined by State law. California Fully Protected species may not be taken or possessed at any time. No licenses or permits may be issued for take, except for collecting those species for necessary scientific research and relocation of the bird species for protection of livestock (Fish & G. Code, § 3511).

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: CDFW recommends the subsequent CEQA document include a mitigation measure whereby individual subsequent projects avoid impacts on California Fully Protected birds by implementing a minimum 0.5-mile no-disturbance buffer around each nest of a California Fully Protected bird. Additionally, a qualified biologist should develop a robust avoidance, buffer, and demarcation plan specifically for California Fully Protected birds depending on project-level specifics [e.g., project area, species, life stage(s), scope of work].

Mitigation Measure #2: CDFW recommends the subsequent CEQA document include a mitigation measure whereby individual subsequent projects notify and consult with CDFW if a Fully Protected species nest is detected within a project area.

Comment #3: San Bernardino Kangaroo Rat

Issue: Project activities at the SASG may impact San Bernardino Kangaroo Rat (*Dipdomys merriami* parvus; SBKR) habitat.

Specific impacts: The Project may result in temporary or permanent impacts or removal of SBKR habitat, crushing or filling of active colonies, causing the death or injury of adults or juveniles.

Why impacts would occur: Impacts may result from ground disturbing activities (e.g., staging, mobilization, and grading), vegetation removal, increased noise disturbances, light, human activity, and dust associated to the creation of new spreading grounds. In addition, diverting water from its current course may decrease the availability of water for SBKR or habitats supporting SBKR, impacting the ability of the species to persist within the Project boundary.

Evidence impacts would be significant: SBKR is a candidate CESA and ESA-listed species. SBKR has experienced loss, degradation, and fragmentation of habitat due to sand and gravel mining, flood control projects, and urban development (United States Fish and Wildlife Service 2007). It was once considered a common species, but the San Bernardino kangaroo rat had lost significant habitat by the 1930s. With continued habitat fragmentation and destruction, today nearly 95 percent of the kangaroo rat's habitat has disappeared. The SASG are within the far western part of SBKR range, and there is potential they may be present in the existing recharge basins.

1-5

CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. As to CESA, take of any endangered, threatened, candidate species, from the Project is prohibited, except as authorized by State law (Fish & G. Code §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Additionally, as to ESA, take of any endangered, threatened, candidate species, from the Project is prohibited, except as authorized by federal law (Endangered Species Act § 10).

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: Species surveys – the Project proponent should retain a qualified biologist with experience surveying for SBKR. Prior to commencing any Project-related ground-disturbing activities, the qualified biologist should conduct surveys for where suitable habitat is present. Pre-construction surveys should be conducted no more than one week prior to initial Project-related ground-disturbing activities. Project related activities include construction, equipment and vehicle access, parking, and staging. Focused surveys should consist of appropriate time of day surveys, no more than one month from the start of any ground-disturbing activities. The surveys should include mapping of current locations of any SBKR for avoidance and relocation efforts and to assist construction monitoring efforts. The survey should be conducted so that 100 percent coverage of the Project site and surrounding areas is achieved.

If SBKR are detected, the qualified biologist should use visible flagging to mark the location where SBKR was detected. The qualified biologist should take a photo of each location, map each location, and provide the specific species detected at that location. The qualified biologist should provide a summary report of SBKR surveys to TVMWD before any Project-related

ground-disturbing activities. The CDFW should be notified and consulted regarding the presence of any special-status wildlife species found on site during surveys. The United States Fish and Wildlife Service (USFWS) should also be notified. Additional avoidance and minimization measures may need to be developed with CDFW/USFWS.

Mitigation Measure #2: CDFW primarily recommends avoiding impacts to SBKR to the greatest extent feasible. If "take" or adverse impacts to SBKR cannot be avoided during any individual subsequent project activities or over the life of the Project, project proponents should apply for a CESA Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2080 *et seq*. Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required to obtain a CESA Permit. CDFW recommends that the project proponents seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an ITP or a consistency determination in certain circumstances. CDFW may require separate CEQA documentation for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

1-5 Con't

Comment #4: Crotch's Bumble Bee

Issue: A search of CNDDB has indicated four occurrences of Crotch's bumble bee within and adjacent to the Project boundary.

Specific impacts: The Project may result in temporal or permanent loss of suitable nesting and foraging habitat. Project ground-disturbing activities may cause death or injury of adults, eggs, and larva; burrow collapse; nest abandonment; and reduced nest success.

Why impacts would occur: Project activities, such as diverting water from its current course, may impact the availability of water for various bird species or habitats supporting birds, impacting the ability of Fully Protected species to persist within the Project boundary. In addition, ground disturbance and vegetation removal associated with Project implementation during the breeding season could result in the incidental loss of breeding success or otherwise lead to nest abandonment in areas adjacent to the Project area. Project activities may result in temporal or permanent loss of colonies, and suitable nesting and foraging habitat.

1-6

Evidence impact would be significant: Crotch's bumble bee has a State ranking of S1/S2. This means that the Crotch's bumble bee is considered critically imperiled or imperiled and is extremely rare (often 5 or fewer populations). Also, Crotch's bumble bee has a very restricted range and steep population declines make the species vulnerable to extirpation from the State (CDFW 2017). Accordingly, Crotch's bumble bee meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of Crotch's bumble bee could require a mandatory finding of significance by TVMWD (CEQA Guidelines, § 15065). Project activities may have potential to substantially reduce or adversely modify habitat, impair the viability of populations, and reduce the number and range of the Crotch's bumble bee.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: Due to suitable habitat within the Project site, CDFW recommends the subsequent CEQA document include a mitigation measure whereby individual subsequent projects analyze potential impacts on Crotch's bumble bee. If suitable habitats are on subsequent project sites, within one year prior to vegetation removal and/or grading for any subsequent projects, a qualified entomologist familiar with the species behavior and life history should conduct surveys to determine the presence/absence of Crotch's bumble bee. Surveys should be conducted during flying season when the species is most likely to be detected above ground, between March 1 to September 1 (Thorp et al. 1983). Survey results, including negative findings, should be submitted to CDFW prior to implementing Project-related ground-disturbing activities. At minimum, a survey report should provide the following:

A) A description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee. CDFW recommends the map show surveyor(s) track lines to document that the entire site was covered during field surveys.
B) Field survey conditions that should include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions: survey goals, and species searched.
C) Map(s) showing the location of nests/colonies.
D) A description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, should include native plant composition (e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species).

1-6 Con't

Mitigation Measure #2: If Crotch's bumble bee is detected, the subsequent CEQA document should require project proponents, in consultation with a qualified entomologist, to develop a plan to fully avoid impacts to Crotch's bumble bee. The plan should include effective, specific, enforceable, and feasible measures. An avoidance plan should be submitted to TVMWD prior to implementing Project-related ground-disturbing activities and/or vegetation removal where there may be impacts to Crotch's bumble bee.

Mitigation Measure #3: If Crotch's bumble bee is detected and if impacts to Crotch's bumble bee cannot be feasibly avoided during Project construction and activities, project proponents/qualified entomologist should coordinate with CDFW to obtain appropriate handling permits for incidental take of Crotch's bumble bee and provide appropriate mitigation for impacts to Crotch's bumble bee habitat. CDFW recommends TVMWD mitigate for impacts to Crotch's bumble bee habitat at a ratio comparable to the Project's level of impacts.

Comment #5: Water Diversion and Impacts on Streams

Issue: The Project may divert surface stormwater and urban runoff for projects, such as those at the Pedley Spreading Grounds (PSG) and the LA County Fairplex (Fairplex). The Project may modify water received or discharged into channels throughout the Project boundary and install new diversion structures to spreading grounds. This may result in impacts to streams.

1-7

Specific impact: Diverting stormwater and runoff into stormwater catchment basins or infiltration galleries may reduce the availability and extent of water flow. Modifications to

channels and installation of diversion structures may result in temporary or permanent impacts to a stream. There could be changes to the hydrologic regime both within the immediate area and downstream. Changes to the hydrologic regime could affect abiotic and biotic variables that support plants, fish, wildlife, and macroinvertebrates. Significant impacts to biological resources could occur, especially during a dry season proceeding after a below-average water year.

Why impacts would occur: Diversion structures may obstruct water flow and change the bed and channel of a stream (confinement). Water diversion may adversely affect the existing stream pattern, potentially resulting in substantial erosion or siltation within the project area and downstream. In addition, the DPEIR does not provide sufficient analysis as to whether the Project, specifically activities associated with the PSG and Fairplex projects, would impact biological resources within the project area, in the vicinity, and downstream.

Biological Resources: Both the concrete-lined and soft-bottom channels in the Project boundary support biological resources. The Project area could potentially support a variety of species that utilize washes and creeks as habitat, including four amphibian species, two bird species, and six mammal species listed in Table 2 of the BRA. A review of the California Natural Diversity Database (CNDDB) shows Thompson Creek may support woody riparian vegetation alliances such as sycamore alder riparian woodland and coast live oak riparian forest.

Flow reductions, especially dry season flow, could impact beneficial uses directly or indirectly through habitat modifications. Diverting water from channels, such as the Thompson Wash, Live Oak Wash, and Marshall Creek, during the dry season could reduce the availability and extent of shallow water sheet flow. The resulting sheet flows allow phytoplankton (algae and cyanobacteria), microorganisms, and herbaceous vegetation to establish. The algae provide habitat and a food source for benthic invertebrates, a vital food source for wading birds. The diversion of water could potentially impact algae and benthic invertebrates, and eventually birds.

1-7 Con't

Seasonality: The DPEIR does not analyze the potential significance of water diversion depending on the season. During the dry season, typically April through September in southern California, the many concrete-lined channels are largely maintained by urban runoff and discharge from wastewater reclamation plants. Diverting water could be significant during the dry season and could either significantly reduce water flow or result in complete loss of water flow.

Drought: The DPEIR does not analyze the potential significance of water diversion during a below-normal water year. Since 2000, the longest duration of drought in California lasted between 2011 and 2019 (USGS 2021) and in southern California, between 2012 through 2016 (Los Angeles Almanac 2021). The 2017-2018 rainfall season was below normal and the driest for Los Angeles since 2006-2007 (Los Angeles Almanac 2021). Diverting water during a below-normal rainfall year may significantly reduce water flow or result in complete loss of water flow.

Cumulative Flow Reductions: The DPEIR does not analyze whether the Project would result in significant impacts when considered with other existing or proposed water diversion projects in surrounding water basins. The cumulative diversion of flows within the Project boundary and in surrounding water basins may lead to decreased flow in surface waters. This could impact not only vegetation and wildlife uses, but also potentially interconnected surface waters, up and downstream of project areas.

Evidence impacts would be significant: Changes to hydrology and channel morphology, both within a project area and downstream, are reasonable potential direct and indirect physical changes in the environment. Said changes and their potential impacts on biological resources should be analyzed and disclosed in an environmental document. Adequate disclosure is necessary for CDFW to assist a lead agency in adequately identifying, avoiding, and/or mitigating a project's significant, or potentially significant, direct, and indirect impacts on biological resources. Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive or special status species will result in a project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species by CDFW, USFWS, and/or National Marine Fisheries Service (NMFS).

In addition, Fish and Game Code section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

- Divert or obstruct the natural flow of any river, stream, or lake;
- Change the bed, channel, or bank of any river, stream, or lake;
- Use material from any river, stream, or lake; or,
- Deposit or dispose of material into any river, stream, or lake.

The construction of diversion devices such as deployable barriers and inflatable dams, and conveyance of water structures within a stream is subject to notification under Fish and Game Code section 1602. The ongoing operations and maintenance of instream storm flow diversion devices and conveyance of water structures is also subject to notification under Fish and Game Code section 1602 once the devices are constructed. Also, the diversion of stormwater and/or dry weather runoff that flows within streams or that have overflown the banks of streams may be subject to notification under Fish and Game Code section 1602.

1-7 Con't

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: CDFW recommends the subsequent CEQA document include a mitigation measure whereby individual subsequent projects analyze potential impacts on biological resources resulting from proposed water diversion. At a minimum, an analysis and should include:

Study Reach

1) A study reach that includes an additional length of channel downstream from a project site. The additional study reach should extend a minimum of one mile downstream, or to the extent of the channel downstream that could be expected to be affected similarly by a proposed project (hydraulic and ecological zones), or an appropriate distance determined by both a qualified biologist and hydrologist, whichever is greater.

Changes to Hydrology and Hydraulics

1) Under pre-project (i.e., baseline) conditions, the volume of water flow from both the project area and study reach during a) the wet (November through March); b) the dry season (April through October); and c) above-average and below-average water year (i.e., wet season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year). The

analysis should clearly define above-average or below-average rainfall year.
2) Under proposed project conditions, the percent reduction in flow from both the project area and study reach for a wet season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year.
3) A quantitative analysis comparing the flow from the project area and other tributaries into the study reach, and their relative contribution to the hydrograph of the study reach.
4) An analysis of potential project-related changes to river hydraulics in both concrete-lined and soft-bottom reaches. This includes water depth (percent change), wetted perimeter (acres gained/lost), and velocity (percent change).

Biological Resources Impact Assessment

1) A map of plant communities and important bird foraging and nesting habitat occurring in the study reach. Plant communities should be mapped at the alliance/association level using the Manual of California Vegetation, second edition (Sawyer et al. 2009). Also, CDFW recommends an updated and thorough floristic-based assessment of plant communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018).
2) A comprehensive list of sensitive and special status plant and wildlife species, and sensitive plant communities, occurring in the study reach. For each biological resource, provide:
    a. A summary of species-specific habitat requirements.
    b. A discussion as to how the species or plant community may be significantly impacted directly or indirectly through habitat modification, as result of changes to hydrology (reduced flow) and hydraulics (water depth, wetted perimeter, velocity); and,
    c. A quantitative analysis and/or adequate discussion to evaluate whether the project would result in those significant impacts.
3) A discussion of whether construction, operations, and maintenance of diversion devices such as rubber dams, pipes, and tunnels, would have direct and/or indirect, permanent or temporal impact on biological resources.
4) An adequate discussion to address how the project may potentially affect on-going habitat recovery and restoration efforts.
5) An adequate discussion of project-related impacts on biological resources in relation to cumulative flow reductions.

1-7 Con't

Mitigation Measure #2: For projects proposing to divert water, CDFW recommends the subsequent CEQA document include a mitigation measure whereby individual subsequent projects develop an Adaptive Management Plan that would reduce or suspend water diversion if at any point the project may impact biological resources downstream exceeding a defined threshold/trigger.

Mitigation Measure #3: CDFW recommends project proponents provide a copy of the basis of water right (water right permit) by State Water Resources Control Board that authorizes the beneficial use of stormwater or dry weather flows diverted from streams. This information along with the LSA Notification would assist CDFW in assessing the need for an LSA Agreement. CDFW recommends including documentation of water rights in a project-level CEQA document

to ensure project budgets and timelines consider CDFW's regulatory process in the implementation of projects under the Six Basins Strategic Plan.

Mitigation Measure #4: CDFW recommends modifying Mitigation Measure BIO-4, *Wetland Permits*, to include the underlined language:

"Waters of the State or Waters of the U.S. the Watermaster Party undertaking a project shall consult with the regulatory agencies (USACE, RWQCB and CDFW) to determine if a CWA 404 permit, CWA 401 or a Streambed Alternation Agreement under Fish and Game Code 1602 are required prior to development. Based on a notification pursuant to Fish and Game Code section 1602 and other information, CDFW will determine whether a Lake and Streambed Alteration (LSA) Agreement is required prior to conducting proposed activities. An LSA Notification shall include the following: 1) an analysis to demonstrate that concrete-lined or soft-bottom channels would not be impaired (e.g., aggraded, incised, increased suspended sediment), 2) a hydrological evaluation of the 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions, 3) whether dewatering/diversion of water may be necessary, and (if applicable) 4), an analysis of whether diversion structures would impact stormwater and dry season water flow, and the extent of those impacts, during the wet season (November through March), dry season (April through October), and both above-average and below-average water year. 1-7 Con't

Recommendation: CDFW's issuance of an LSA Agreement for project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from a lead agency for a project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 *et seq*. and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.

To compensate for any on- and off-site impacts to riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: erosion and pollution control measures, avoidance of resources, protective measures for downstream resources, on- and/or off-site habitat creation, enhancement or restoration, and/or protection, and management of mitigation lands in perpetuity.

Comment #6: Impacts on Riparian Habitat

Issue: The Project may impact riparian habitat.

Specific impacts: The Project may result in temporary or permanent loss of riparian resources

Why impacts would occur: According to CNDDB, areas within and adjacent to the Project boundary contain riparian vegetation communities. This includes sycamore alder riparian woodland, Riversidean alluvial fan sage scrub, and coast live oak riparian forest. In addition, the BRA identifies scale broom scrub (*Lepidospartum squamatum*), laurel sumac scrub (*Artemesia/Eriogonum/*Malosma) mosaic and cost live oak woodland (*Quercus agrifolia*) alliances on site at TCSG and SASG. Moreover, the California Natural Communities List designates scale broom scrub as a sensitive alliance. Some or all of these vegetation communities could be completely removed during project construction and activities, especially 1-8

with the creation of new spreading grounds. This could result in temporary or permanent loss of riparian habitat. Vegetation communities may also be impacted through changes to hydrology (e.g., amount of flow) and hydraulics (e.g., wetted perimeter and depth). These changes may occur if a project modifies the channel, installs diversion structures, or expands recharge basins. Increased sediment deposition can bury seedlings and saplings of riparian trees, resulting in increased mortality of new recruits (Kui and Stella 2016).

Evidence impacts would be significant: Over 90 percent of southern California's coastal riparian habitat have been lost (USACE 2015). The remaining fragments of riparian habitat contribute significantly to the integrity of regional hydrologic connectivity, biodiversity, and habitat connectivity and wildlife movement between significant ecological areas, including the nationally significant San Gabriel Mountains National Monument (USACE 2015). Therefore, loss of remaining riparian habitat could affect regional hydrologic, habitat, and wildlife connectivity, and increase threats/stressors on regional biodiversity. Per CEQA Guidelines section 15065(a), a project may have a significant effect on biological resources if the project substantially reduces the habitat of a fish or wildlife species; threatens to eliminate a plant community; or has the potential to restrict the range of an endangered, rare, or threatened species.

1-8 Con't

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure: CDFW recommends that there be no net loss of riparian habitat within the Project boundary. Mitigation for impacts to riparian habitat should be provided within the Project boundary or at a CDFW approved mitigation bank. Compensatory mitigation should increase if a project would result in permanent loss of riparian habitat within a contiguous riparian corridor or loss of an isolated, remnant habitat patch. Mitigation should increase if a project would impact a riparian vegetation community considered rare in the State (i.e., S1, S2, or S3). Mitigation should further increase if the riparian habitat is considered very threatened or threatened (i.e., 0.1, 0.2). Mitigation should further increase if the riparian habitat impacted supports special status species, specifically obligate riparian breeders (e.g., Coastal California gnatcatcher (*Polioptila californica californica*)). Mitigation should replace the same vegetation association/alliance that was impacted.

Comment #7: California Species of Special Concern

Issue: The Project may impact California Species of Special Concern (SSC). According to Table 2 of the BRA, the Project area has the potential to support SSC, which includes two avian species, one fish, four amphibians, five reptiles, and six mammals.

Specific impacts: Project construction and activities, directly or through habitat modification, may result in direct injury or mortality (trampling, crushing), reduced reproductive capacity, population declines, or local extirpation of an SSC. Temporal or permanent loss of foraging, breeding, nesting, or nursery habitat for an SSC may occur.

1-9

Why impacts would occur: Mitigation Measure BIO-3 of the DPEIR includes the need for biological resource assessments for "future projects on sites not identified in this [DP]EIR and occurring within an undeveloped area." While CDFW concurs that such assessments are necessary, there is concern over the lack of specifics a "mitigation strategy" would include in the event an SSC is detected during the assessment. Typical compensatory mitigation includes the purchase of land consisting of suitable habitat and/or individuals of the impacted species. There

is no discussion of whether the mitigation strategy will include preservation, enhancement, restoration, or other mitigation activities to offset impacts to sensitive species and habitats. Mitigation measures should be adequately discussed and the basis for setting a particular measure should be identified [CEQA Guidelines, § 15126.4(a)(1)(B)]. The DPEIR does not provide enough information regarding the appropriate avoidance and minimization measures to facilitate meaningful public review and comment on the appropriateness of BIO-3. Additionally, all subsequent projects would have a cumulative impact on biological resources over the life of the Project. Therefore, it is unclear how the mitigation strategy would be developed in order to reduce impacts to biological resources to less than significant.

More specifically, impacts to an SSC could result from ground-disturbing (e.g., staging, mobilization, demolition, and grading) activities, vegetation removal, increased noise disturbances, light, human activity, and dust. All of these impacts should be addressed in the mitigation strategy.

Evidence impact would be significant: A California Species of Special Concern is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:

- is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;
- is listed as ESA-, but not CESA-, threatened, or endangered; meets the State definition of threatened or endangered but has not formally been listed;
- is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; and/or,
- has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA threatened or endangered status (CDFW 2021a)

1-9 Con't

CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC which can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of SSC could require a mandatory finding of significance (CEQA Guidelines, § 15065). Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species by CDFW.

Recommended Potentially Feasible Mitigation Measure(s):

When preparing a mitigation strategy for review and approval, CDFW recommends including the following measures, at a minimum, to reduce impacts to less than significant.

Mitigation Measure #1: If impacts are unavoidable, wildlife should be protected, allowed to move away on its own (noninvasive, passive relocation), or relocated to adjacent appropriate habitat on site or to suitable habitat adjacent to the project area. SSC should be captured only by a qualified biologist with proper handling permits. The qualified biologist should prepare a species-specific list (or plan) of proper handling and relocation protocols and a map of suitable and safe relocation areas. A relocation plan should be prepared prior to implementing any

Project-related ground-disturbing activities and vegetation removal.

While relocation is an option for mitigating impacts, it may not fully account for impacts to an SSC, such as loss of individuals, loss of habitat, or loss of natal dens/middens/burrows. Capturing, handling, or relocation are acts that may have multiple unintended negative consequences, including increased stress and mortality of relocated animals, negative impacts on resident animals at release sites, increased conflicts with human interests, and the spread of diseases. Attempts to avoid impacts to SSC should be the first option. Seeking a Scientific Collection Permits (see Mitigation Measure #2 below) in order to trap and relocate individuals should only be done if impacts cannot be avoided.

Mitigation Measure #2: Handling and relocation of wildlife, including SSC, may be required. If so, Pursuant to the California Code of Regulations, title 14, section 650, the lead agency/qualified biologist should obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities. Please visit CDFW's Scientific Collection Permits webpage for information (CDFW 2021b). An LSA Agreement may provide similar take or possession of species as described in the conditions of the Agreement.

CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650).

1-9 Con't

Mitigation Measure #3: CDFW recommends providing compensatory mitigation for temporary and/or permanent loss of any habitat supporting SSC. There should be no net loss of habitat supporting SSC within the Project boundary. Compensatory mitigation for should be provided within the Project boundary. Compensatory mitigation should be provided at no less than 2:1. Mitigation should provide upland and/or aquatic habitat (depending on the species), refugia, and habitat structures that supports that species (e.g., woody material, rocks, brush piles, pools, burrows). Any proposed mitigation area/plan should include a discussion on the territory size; nesting, breeding, foraging, and refuge, locations, invasive, non-native plant and wildlife species present, food availability, and how all life cycle functions will be mitigated. Mitigation for impacts to an SSC should adhere to CDFW and/or USFWS established protocol/guidelines if available.

Comment #8 Tree Removal

Issue: The DPEIR indicates projects may require tree trimming or removal.

Specific Impact: Project activities that result in the removal of trees may cause temporary or permanent impacts to wildlife that utilize the tree as habitat. In addition, native tree species could be removed, causing further declines in native vegetation.

1-10

Why impact would occur: As written, BIO-1 only addresses "heritage trees". This term is not defined in relation to the DPEIR, so it is unknown what trees would fall under BIO-1. Therefore, there would be a net loss of trees that do not fall under "heritage tree" classification. Moreover,

tree removal may result in temporary or permanent losses to bird or bats that may utilize the tree as habitat.

Evidence Impact would be significant: Any type of trees on site may provide adequate habitat for nesting birds and roosting bats. For tree species like coast live oak, wildlife, such as squirrels, magpies, scrub jays and other bird species, depend on the tree for an important food source (Steinberg 2002). Additionally, removal of trees on site may temporarily or permanently impact available habitat for wildlife in the area.

Recommended Potentially Feasible Mitigation Measure(s):

1-10 Con't

Mitigation Measure: The Project area is partially located in the City of La Verne. Therefore, in order to ensure no net loss of native trees, CDFW recommends following the City of La Verne *General Plan Update Conservation and Natural Resources Background Report* replacement ratio (at a minimum) for the removal of any mature tree which states, "Require mature trees to be replaced at the four-to-one ratio". CDFW recommends this replacement include a combination of native trees and/or appropriate understory and lower canopy plantings. Replacement oaks should be of the same species and come from nursery stock grown from locally sourced acorns, or from acorns gathered locally, preferably from the same watershed in which they were planted. CDFW recommends replacing nonnative trees with native trees.

Comment #9: Tree Diseases, Pests, and Pathogens

Issue: The Project may remove trees and spread material infected with invasive tree diseases, pests, and pathogens.

Specific impacts: The Project may spread tree insect pests and diseases into areas not currently exposed to these stressors. This could result in expediting the loss of native trees and plant communities. Loss of trees may result in loss of foraging and perching habitat for small mammals, birds, and raptors.

Why impacts would occur: The Project may remove trees that could host diseases and pests. One such pathogen is sudden oak death. Sudden oak death has become the most common cause of mortality of oak (*Quercus* genus) and other native trees (Phytosphere 2015). Mortality rates of oak trees are greater than 50 percent in some areas impacted by sudden oak death (Phytosphere 2012). Tree dieback can have cascading impacts on the habitat and ecosystem, particularly avian distribution and abundance (Monahan and Koenig 2006). Another pest is the polyphagous shot hole borer, which hosts on many native trees species that include box elder (*Acer negundo*), California sycamore (*Platanus racemosa*), willows (*Salix* genus), oaks, cottonwoods (*Populus* genus), and alders (*Alnus* genus) (Calinvasives 2021).
Diseases such as sudden oak death can spread via equipment and transport of infected material. These fragments can be spread to new locations if equipment and tools are not disinfected or cleaned before moving to the next work location. Infected material that is transported off site for disposal may expose trees and plant communities to pest and disease. This could result in expediting the loss of California sycamore, oak trees, and other native trees and plant communities within and adjacent to a project area.

1-11

Evidence impacts would be significant: The Project may have a substantial adverse effect on any sensitive natural communities identified in local or regional plans, policies, and regulations

or by the CDFW. The Project may result in a substantial adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW that are dependent on woodlands susceptible to insect and disease pathogens.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure: CDFW recommends that the subsequent CEQA document include a measure to mitigate the spread of invasive pests and diseases by implementing the following:

1) Prior to tree removal, a certified arborist should evaluate trees for infectious tree diseases including but not limited to: sudden oak death (*Phytophthora ramorum*), thousand canker fungus (*Geosmithia morbida*), polyphagous shot hole borer (*Euwallacea* spp.), and goldspotted oak borer (*Agrilus auroguttatus*) (TCD 2021; UCANR 2021; Phytosphere Research 2012; UCIPM 2013).
2) If a certified arborist determines trees are impacted by infectious pests or diseases, the certified arborist should prepare an Infectious Tree Disease Management Plan or develop a detailed, robust, enforceable, and feasible list of preventative measures. A plan/list should provide measures relevant for each tree pest or disease observed. To avoid the spread of infectious tree pests and diseases, infected trees should not be transported from a project area without first being treated using best available management practices described Infectious Tree Disease Management Plan or list of preventative measures.
3) If possible, all tree material, especially infected tree material, should be left on site. The material could be chipped for use as ground cover or mulch. Pruning and power tools should be cleaned and disinfected before use to prevent introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas.

1-11 Con't

Comment #10: In-lieu Fees

Issue: Mitigation Measure BIO-4 *Wetland Permits* mentions an “in lieu fee program” as an option for offsite replacement of wetland resources.

Specific impacts: Impacting wetland resources has the potential to impact directly, or indirectly through habitat loss, sensitive, special status, threatened, and/or endangered plants, wildlife, and vegetation communities. In addition, the DPEIR does not provide sufficient information for CDFW to evaluate the adequacy of in-lieu fees to offset the cumulative loss of biological resources associated with wetlands.

Why impacts would occur: It is unclear how proposed payments would be sufficient to offset impacts associated with the Project. Typical compensatory mitigation includes the purchase of land consisting of suitable habitat and/or individuals of the impacted species. CDFW is concerned that an in-lieu fee would not provide enough funding for preservation, enhancement, restoration, or other mitigation activities to offset impacts to sensitive species and habitats.

1-12

The DPEIR does not explain or make a connection as to why in-lieu fee is adequate to offset Project impacts so that the Project would have no impacts. The DPEIR does not discuss or provide the following information:

1) Whether the in-lieu fee is going towards an established program.
2) How that program is designed to (and will) mitigate the effects at issue at a level meaningful for purposes of CEQA.
3) What the in-lieu fee would acquire. It is unclear if the in-lieu fee would be used to acquire land for preservation, enhancement, and/or restoration purposes, or if the in-lieu fee would be used to purchase credits at a mitigation bank, or none of the above.
4) What biological resources would the in-lieu fee protect/conserve.
5) Why the in-lieu fee is appropriate for mitigating cumulative loss of biological resources in the Project area.
6) How the in-lieu fee is sufficient to purchase land or credits at a mitigation bank.
7) Where the project proponent may acquire land or purchase credits at a mitigation bank so that the in-lieu fee would offset Project impacts on biological resources in the Project area.
8) When the project proponent would use the fee in the Project area. Mitigation payment does not equate to mitigation if the funds are not being used. Also, temporal impacts on biological resources may occur as long as the project proponent fails to implement its proposed mitigation.
9) How the project proponent would commit to the project to paying the in-lieu fee. For example, when would the project proponent require payment from the project applicant, how long would the project applicant have to pay the fee, and what mechanisms would project proponent implement to ensure the fee is paid? Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments (CEQA Guidelines, § 15126.4).
10) What performance measures the proposed mitigation would achieve (CEQA Guidelines, § 15126.4).
11) What type(s) of potential action(s) that can feasibly achieve those performance standards (CEQA Guidelines, § 15126.4); and,
12) How the in-lieu fee would be adequate such that no impacts would occur as a result of the Project.

1-12 Con't

Evidence impacts would be significant: Without identifying when mitigation activities will be implemented, additional temporal impacts to biological resources would occur. Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by CDFW or USFWS. This Project may have the potential to reduce the habitat of rare plants or wildlife; cause rare plants or wildlife population to drop below self-sustaining levels; threatened to eliminate a plant or animal community; and substantially reduce the number or restrict the range of an endangered, rare, or threatened species [CEQA Guidelines, § 15065(a)(1)]. Additionally, this Project has possible environmental effects that are cumulatively considerable [CEQA Guidelines, § 15065(a)(3)].

Recommended Potentially Feasible Mitigation Measure(s):

Recommendation #1: CDFW recommends the subsequent environmental document provide adequate, complete, and good-faith disclosure of information that would address the following in relation to the Project:

1) Whether the in-lieu fee is going towards an established program.

2) How the program is designed to (and will) mitigate the effects at issue at a level meaningful for purposes of CEQA.
3) What the in-lieu fee would acquire.
4) What biological resources would the in-lieu fee protect/conserve.
5) Why the in-lieu fee is appropriate for mitigating the cumulative loss of biological resources.
6) Why the in-lieu fee is sufficient to purchase land or credits at a mitigation bank.
7) Where the project proponent may acquire land or purchase credits at a mitigation bank.
8) When the project proponent would use the in-lieu fee; and,
9) How the in-lieu fee would be adequate such that no impacts would occur as a result of the Project.

1-12 Con't

The project proponent should provide any technical data, maps, plot plans, diagrams, and similar relevant information in addressing these concerns (CEQA Guidelines, § 15147).

Recommendation #2: CDFW recommends that the project proponent provide a discussion describing how it intends to commit to mitigation via the in-lieu fee. For example, the project proponent should provide specifics as to when would the project proponent require payment from the project applicant, how long would the project applicant have to pay the fee, what mechanisms would the project proponent implement to ensure the fee is paid, and when the project proponent would use the project's payment for mitigation. Also, the project proponent should provide specific performance standards and actions to achieve those performance standards.

Recommendation #3: CDFW recommends that the project proponent recirculate the DPEIR for more meaningful public review and assessment of the project proponent's in-lieu fee. Additionally, the Project proponent should recirculate the DPEIR if the proposed mitigation measure (i.e., in-lieu fee) would not reduce potential effects to less than significant and new measures must be required [CEQA Guidelines, § 15073.5(b)(2)].

Additional Recommendations

Nesting Birds. The Project's proposed Mitigation Measure BIO-2, *Nesting Birds*, as it is currently proposed, Project activities occurring during the bird and raptor breeding and nesting season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. CDFW recommends TVMWD amend Mitigation Measure BIO-3 to exclude the ~~strikethrough~~ and include the underlined language:

"[…] The nesting season generally extends from February 1 through ~~August 31~~ September 15 (as early as January 1 for some raptors), but it can vary slightly from year to year based on seasonal weather conditions. If ground disturbance and vegetation removal cannot occur outside of the qualified Avian Biologist's-verified nesting season, a preconstruction clearance survey for nesting birds shall be conducted ~~within 30 days~~ within a 500-foot radius of the construction site. Based on local conditions, the nesting bird surveys should be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. Surveys shall be conducted no more than 7 days prior to the ~~of the~~ start of any construction. If Project activities are delayed or suspended for more than 7 days during the breeding season, repeat surveys should be repeated. If no active nests are found, no further action would be required.[…]"

1-13

Rare Plant Surveys. The Project's proposed Mitigation Measure BIO-3, *Additional Biological Resources Assessments*, as it is currently proposed, may result in missed detections of rare plants not previously known to occur at a project site. This may result in population declines or local extirpation of a rare plant species, as there is potential for approximately 24 species of rare plants to occur within the Project boundary, according to BRA Table 2. CDFW recommends TVMWD amend Mitigation Measure BIO-3 to include the underlined language:

"[…] a biological assessment shall be made, while identifying and mapping all vegetation communities and land-cover types, of the selected or potential sites to determine if sensitive biological resources (listed, candidate, or other special-status plants and/or wildlife, sensitive plant community, sensitive species, jurisdiction waters) are present. To determine presence/absence or accurately identifying rare plants, a qualified botanist shall conduct multiple rare plant surveys throughout the growing season for any given year. Surveys shall occur during the time of year when rare plants are more likely to be visually detectable. Rare plant surveys proceeding after a low water year shall be supplemented with one or two additional rare plant surveys over a number of years depending on the rare plant species, annual weather patterns, and whether the project area was recently disturbed (e.g., fire).

1-13 Con't

Rodenticides. CDFW recommends TVMWD prevent the use of second-generation anticoagulant rodenticides on any project associated with the Project.

Data. CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., California Natural Diversity Database (CNDDB)] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, CDFW recommends that the subsequent CEQA document include measures where lead agencies of individual projects tiering from the subsequent CEQA document report any special status species detected during preparation of project-level environmental impact analyses/environmental documents. Special status species information should be submitted to the CNDDB by completing the Online Field Survey Form (CDFW 2021d). The lead agency should ensure all pertinent data has been properly submitted, with all applicable data fields filled out, prior to finalizing/adopting an environmental document. The lead agency should provide CDFW with confirmation of data submittal.

Mitigation and Monitoring Reporting Plan. CDFW recommends TVMWD update the Project's proposed Biological Mitigation Measures and condition the environmental document to include mitigation measures recommended in this letter. CDFW provides comments to assist project proponents in developing mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). TVMWD is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided TVMWD with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A).

1-14

Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required for the underlying Project approval to be operative, vested, and final (Cal. Code Regs., tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089). 1-15

Conclusion

We appreciate the opportunity to comment on the Project to assist Three Valley Municipal Water District in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that TVMWD has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines, § 15073(e)]. If you have any questions or comments regarding this letter, please contact Felicia Silva, Environmental Scientist, at (562) 292-8105 or by email at Felicia.Silva@wildlife.ca.gov 1-16

Sincerely,

DocuSigned by:
Erinn Wilson-Olgin
B6E58CFE24724F5...

Erinn Wilson-Olgin
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State Clearinghouse - state.clearinghouse@opr.ca.gov

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Attachment A: Draft Mitigation and Monitoring Reporting Plan

CDFW recommends the following language to be incorporated into a future environmental document for the Project.

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		**Timing**	**Responsible Party**
MM-BIO-1-GDEs	Project proponents shall determine the following in areas identified for projects and any area sited for individual subsequent projects: 1) determine which proposed project actions are most likely to impact GDEs based on basin hydrology, 2) deploy representative groundwater monitoring stations within GDEs to track groundwater levels and vegetation responses overtime, 3) establish thresholds/triggers for adaptive management to respond to stressed vegetation as needed.	Preparation of project-level CEQA document/ prior to finalizing project-level CEQA document	Project-level lead agency
MM-BIO-2-GDEs	If habitat benefits are expected based on Project development, through the use of the monitoring stations mentioned in the previous mitigation measure, they shall be monitored for sustainable groundwater levels and the GDE response. If GDEs display a positive response to projects, then Project proponents shall maintain groundwater management activities to allow GDEs to sustain that beneficial level.	Preparation of project-level CEQA document/ prior to finalizing project-level CEQA document	Project-level lead agency
Rec-1-GDEs	The subsequent CEQA document shall verify the GDE existence, identify vegetated communities (e.g. species compositions), and associated rooting depths/optimal groundwater table elevations. This verification should be conducted for areas identified for projects and any area sited for individual subsequent projects.	Preparation of project-level CEQA document/ prior to finalizing project-level CEQA document	Project-level lead agency

MM-BIO-3-Impacts on California Fully Protected Birds	Impacts on California Fully Protected birds shall be avoided by implementing a minimum 0.5-mile no-disturbance buffer around each nest of a California Fully Protected bird. A qualified biologist shall develop a robust avoidance, buffer, and demarcation plan specifically for California Fully Protected birds depending on project-level specifics [e.g., project area, species, life stages(s), scope of work].	Prior to/During project ground-disturbing activities	Project-level lead agency
MM-BIO-4-Impacts on California Fully Protected Birds	Individual subsequent projects shall notify and consult with CDFW if a Fully Protected species nest is detected within a project area.	Prior to project ground-disturbing activities	Project-level lead agency
MM-BIO-5-SBKR	Project proponents shall retain a qualified biologist with experience surveying for SBKR. Prior to commencing any Project-related ground-disturbing activities, the qualified biologist shall conduct surveys for where suitable habitat is present. Pre-construction surveys shall be conducted no more than one week prior to initial Project-related ground-disturbing activities. Project related activities include construction, equipment and vehicle access, parking, and staging. Focused surveys shall consist of appropriate time of day surveys, no more than one month from the start of any ground-disturbing activities. The surveys shall include mapping of current locations of any SBKR for avoidance and relocation efforts and to assist construction monitoring efforts. The survey shall be conducted so that 100 percent coverage of the Project site and surrounding areas is achieved. If SBKR are detected, the qualified biologist shall use visible flagging to mark the location where SBKR was detected. The qualified biologist shall take a photo of each location, map each location, and provide the specific species detected at that location. The qualified biologist shall provide a summary report of SBKR surveys to TVMWD/project proponent before any Project-related ground-disturbing activities. The CDFW shall be notified and	Prior to project ground-disturbing activities	Project-level lead agency

	consulted regarding the presence of any special-status wildlife species found on site during surveys. The USFWS shall also be notified. Additional avoidance and minimization measures may need to be developed with CDFW/USFWS.		
MM-BIO-6-SBKR	If "take" or adverse impacts to SBKR cannot be avoided during any individual subsequent project activities or over the life of the Project, project proponents shall apply for a CESA Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2080 *et seq*. Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required to obtain a CESA Permit. The Project proponent shall seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an ITP or a consistency determination in certain circumstances. CDFW may require separate CEQA documentation for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals shall be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.	Prior to project ground-disturbing activities	Project-level lead agency
MM-BIO-7-Crotch's bumble bee	Due to suitable habitat within the Project boundary, individual subsequent projects shall analyze potential impacts on Crotch's bumble bee. If suitable habitat is on subsequent project sites, within one year prior to vegetation removal and/or grading for any individual subsequent projects, a qualified entomologist familiar with the species behavior and life history shall conduct surveys to determine the presence/absence of Crotch's bumble bee. Surveys shall be conducted during flying season when the species is most likely to be detected above ground, between March 1 to September 1 (Thorp et al. 1983). Survey results, including negative findings, shall be submitted to CDFW prior to implementing Project-related ground-disturbing activities. At minimum, a survey report shall provide the following:	Prior to project ground-disturbing activities	Project-level lead agency

	a) A description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee. CDFW recommends the map show surveyor(s) track lines to document that the entire site was covered during field surveys. b) Field survey conditions that shall include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched. c) Map(s) showing the location of nests/colonies. d) A description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, shall include native plant composition (e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species).		
MM-BIO-8-Crotch's bumble bee	If Crotch's bumble bee is detected, the subsequent CEQA document shall require project proponents, in consultation with a qualified entomologist, to develop a plan to fully avoid impacts to Crotch's bumble bee. The plan shall include effective, specific, enforceable, and feasible measures. An avoidance plan shall be submitted to the project proponent prior to implementing Project-related ground-disturbing activities and/or vegetation removal where there may be impacts to Crotch's bumble bee.	Prior to project ground-disturbing activities	Project-level lead agency
MM-BIO-9-Crotch's bumble bee	If Crotch's bumble bee is detected and if impacts to Crotch's bumble bee cannot be feasibly avoided during Project construction and activities, project proponents /qualified entomologist shall coordinate with CDFW to obtain appropriate handling permits for incidental take of Crotch's bumble bee and provide appropriate mitigation for impacts to Crotch's bumble bee habitat. The project	Prior to project ground-disturbing activities	Project-level lead agency

	proponents shall mitigate for impacts to Crotch's bumble bee habitat at a ratio comparable to the Project's level of impacts.		
MM-BIO-10- Impacts of Water Diversion on Streams	Individual subsequent projects shall analyze potential impacts on biological resources resulting from proposed water diversion. At a minimum, an analysis and shall include: *Study Reach* 1) A study reach that includes an additional length of channel downstream from a project site. The additional study reach shall extend a minimum of 1 mile downstream, or to the extent of the LA River downstream that could be expected to be affected similarly by a proposed project (hydraulic and ecological zones), or an appropriate distance determined by both a qualified biologist and hydrologist, whichever is greater. *Changes to Hydrology and Hydraulics* 1) Under pre-project (i.e., baseline) conditions, the volume of water flow from both the project area and study reach during a) the wet (November through March); b) the dry season (April through October); and c) above-average and below-average water year (i.e., wet season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year). The analysis shall clearly define above-average or below-average rainfall year. 2) Under proposed project conditions, the percent reduction in flow from both the project area and study reach for a wet season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year. 3) A quantitative analysis comparing the flow from the project area and other tributaries into the study reach, and their relative contribution to the hydrograph of the study reach. 4) An analysis of potential project-related changes to river hydraulics in both concrete-lined and soft-bottom reaches. This includes water depth (percent change), wetted	Preparation of project-level CEQA document/ prior to finalizing project-level CEQA document	Project-level lead agency

	perimeter (acres gained/lost), and velocity (percent change). *Biological Resources Impact Assessment* 1) A map of plant communities and important bird foraging and nesting habitat occurring in the study reach. Plant communities shall be mapped at the alliance/association level using the Manual of California Vegetation, second edition. An updated and thorough floristic-based assessment of plant communities shall follow CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. 2) A comprehensive list of sensitive and special status plant and wildlife species, and sensitive plant communities, occurring in the study reach. For each biological resource, provide: a. A summary of species-specific habitat requirements; b. A discussion as to how the species or plant community may be significantly impacted directly or indirectly through habitat modification, as result of changes to hydrology (reduced flow) and hydraulics (water depth, wetted perimeter, velocity); and, c. A quantitative analysis and/or adequate discussion to evaluate whether the project would result in those significant impacts. 3) A discussion of whether construction, operations, and maintenance of diversion devices such as rubber dams, pipes, and tunnels, would have direct and/or indirect, permanent or temporal impact on biological resources. 4) An adequate discussion to address how the project may potentially affect on-going habitat recovery and restoration efforts. 5) An adequate discussion of project-related impacts on biological resources in relation to cumulative flow		

	reductions.		
MM-BIO-11-Impacts of Water Diversion on Streams	For projects proposing to divert water, individual subsequent projects shall develop an Adaptive Management Plan that would reduce or suspend water diversion if at any point the project may impact biological resources downstream exceeding a defined threshold/trigger.	Prior to water diversion construction and activities	Project-level lead agency
MM-BIO-12-Impacts of Water Diversion on Streams	Project proponents shall provide a copy of the basis of water right (water right permit) by State Water Resources Control Board that authorizes the beneficial use of stormwater or dry weather flows diverted from streams. This information along with the LSA Notification would assist CDFW in assessing the need for an LSA Agreement. This will include documentation of water rights in a project-level CEQA document to ensure project budgets and timelines consider CDFW's regulatory process in the implementation of projects under the Six Basins Strategic Plan.	Prior to water diversion construction and activities	Project-level lead agency
MM-BIO-13-Impacts of Water Diversion on Streams	Mitigation Measure BIO-4, *Wetland Permits*, shall be modified to include the <u>underlined</u> language: "Waters of the State or Waters of the U.S. the Watermaster Party undertaking a project shall consult with the regulatory agencies (USACE, RWQCB and CDFW) to determine if a CWA 404 permit, CWA 401 or a Streambed Alternation Agreement under Fish and Game Code 1602 are required prior to development. <u>Based on a notification pursuant to Fish and Game Code section 1602 and other information, CDFW will determine whether a Lake and Streambed Alteration (LSA) Agreement is required prior to conducting proposed activities. An LSA Notification shall include the following: 1) an analysis to demonstrate that concrete-lined or soft-bottom channels would not be impaired (e.g., aggraded, incised, increased suspended sediment), 2) a hydrological evaluation of the 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions, 3) whether dewatering/diversion of water may be necessary, and (if applicable) 4), an analysis of whether diversion</u>	Prior to water diversion construction and activities	Project-level lead agency

	structures would impact stormwater and dry season water flow, and the extent of those impacts, during the wet season (November through March), dry season (April through October), and both above-average and below-average water year.		
Rec-2- Impacts of Water Diversion on Streams	CDFW's issuance of an LSA Agreement for project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from a lead agency for a project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 *et seq*. and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement. To compensate for any on- and off-site impacts to riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: erosion and pollution control measures, avoidance of resources, protective measures for downstream resources, on- and/or off-site habitat creation, enhancement or restoration, and/or protection, and management of mitigation lands in perpetuity.	Prior to water diversion construction and activities	Project-level lead agency
MM-BIO-14- Impacts on Riparian Habitat	There shall be no net loss of riparian habitat within the Project boundary. Mitigation for impacts to riparian habitat shall be provided within the Project boundary or at a CDFW approved mitigation bank. Compensatory mitigation shall increase if a project would result in permanent loss of riparian habitat within a contiguous riparian corridor or loss of an isolated, remnant habitat patch. Mitigation shall increase if a project would impact a riparian vegetation community considered rare in the State (i.e. S1, S2, or S3). Mitigation shall further increase if the riparian habitat is considered very threatened or threatened (i.e., 0.1, 0.2). Mitigation shall further increase if the riparian habitat impacted supports special status species, specifically obligate riparian breeders (e.g.,	Prior to project ground-disturbing activities	Project-level lead agency

	Coastal CA gnatcatcher). Mitigation shall replace the same vegetation association/alliance that was impacted.		
MM-BIO-15- Impacts on California Species of Special Concern	If impacts are unavoidable, wildlife shall be protected, allowed to move away on its own (noninvasive, passive relocation), or relocated to adjacent appropriate habitat on site or to suitable habitat adjacent to the project area. SSC shall be captured only by a qualified biologist with proper handling permits. The qualified biologist shall prepare a species-specific list (or plan) of proper handling and relocation protocols and a map of suitable and safe relocation areas. A relocation plan shall be prepared prior to implementing any Project-related ground-disturbing activities and vegetation removal. Attempts to avoid impacts to SSC shall be the first option. Seeking a Scientific Collection Permits in order to trap and relocate individuals shall only be done if impacts cannot be avoided.	Prior to/During project ground-disturbing activities	Project-level lead agency
MM-BIO-16- Impacts on California Species of Special Concern	Appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities shall be obtained.	Prior to project ground-disturbing activities	Project-level lead agency
MM-BIO-17- Impacts on California Species of Special Concern	Compensatory mitigation shall be provided for temporary and/or permanent loss of any habitat supporting SSC. There shall be no net loss of habitat supporting SSC within the Project boundary. Compensatory mitigation for shall be provided within the project area. Compensatory mitigation shall be provided at no less than 2:1. Mitigation shall provide upland and/or aquatic habitat (depending on the species), refugia, and habitat structures that supports that species (e.g., woody material, rocks, brush piles, pools, burrows). Any proposed mitigation area/plan shall include a discussion on the territory size; nesting, breeding, foraging, and refuge, locations, invasive, non-native plant and wildlife species present, food availability, and how all life cycle functions will be mitigated. Mitigation for impacts to an SSC shall adhere to CDFW and/or USFWS established protocol/guidelines if available.	Prior to/During project ground-disturbing activities	Project-level lead agency

MM-BIO-18-Tree Removal	In order to ensure no net loss of native trees, the City of La Verne *General Plan Update Conservation and Natural Resources Background Report* replacement ratio (at a minimum) shall be required for the removal of any mature tree which states, "Require mature trees to be replaced at the four-to-one ratio". This replacement shall include a combination of native trees and/or appropriate understory and lower canopy plantings. Replacement oaks should be of the same species and come from nursery stock grown from locally sourced acorns, or from acorns gathered locally, preferably from the same watershed in which they were planted. Nonnative trees shall be replaced with native trees..	Prior to/During project ground-disturbing activities	Project-level lead agency
MM-BIO-19-Tree Diseases, Pests, and Pathogens	The spread of invasive pests and diseases shall be mitigated by implementing the following: 1) Prior to tree removal, a certified arborist shall evaluate trees for infectious tree diseases including but not limited to: sudden oak death (*Phytophthora ramorum*), thousand canker fungus (*Geosmithia morbida*), polyphagous shot hole borer (*Euwallacea* spp.), and goldspotted oak borer (*Agrilus auroguttatus*); 2) If a certified arborist determines trees are impacted by infectious pests or diseases, the certified arborist shall prepare an Infectious Tree Disease Management Plan or develop a detailed, robust, enforceable, and feasible list of preventative measures. A plan/list shall provide measures relevant for each tree pest or disease observed. To avoid the spread of infectious tree pests and diseases, infected trees shall not be transported from a project area without first being treated using best available management practices described Infectious Tree Disease Management Plan or list of preventative measures. 3) If possible, all tree material, especially infected tree material, shall be left on site. The material could be chipped for use as ground cover or mulch. Pruning and power tools shall be cleaned and disinfected before use to prevent	Prior to/During project construction activities	Project-level lead agency

	introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas.		
REC-3-In-lieu Fees	CDFW recommends the subsequent environmental document provide adequate, complete, and good-faith disclosure of information that would address the following in relation to the Project: 1) Whether the in-lieu fee is going towards an established program; 2) How the program is designed to (and will) mitigate the effects at issue at a level meaningful for purposes of CEQA; 3) What the in-lieu fee would acquire; 4) What biological resources would the in-lieu fee protect/conserve; 5) Why the in-lieu fee is appropriate for mitigating the cumulative loss of biological resources; 6) Why the in-lieu fee is sufficient to purchase land or credits at a mitigation bank; 7) Where the project proponent may acquire land or purchase credits at a mitigation bank; 8) When the project proponent would use the in-lieu fee; and, 9) How the in-lieu fee would be adequate such that no impacts would occur as a result of the Project. The project proponent should provide any technical data, maps, plot plans, diagrams, and similar relevant information in addressing these concerns (CEQA Guidelines, § 15147).	Prior to finalizing PEIR	TVMWD
REC-4-In-lieu Fees	CDFW recommends that the project proponent provide a discussion describing how it intends to commit to mitigation via the in-lieu fee. For example, the project proponent should provide specifics as to when would the project proponent require payment from the project applicant, how long would the project applicant have to pay the fee, what mechanisms would the project proponent	Prior to finalizing PEIR	TVMWD

	implement to ensure the fee is paid, and when the project proponent would use the project's payment for mitigation. Also, the project proponent should provide specific performance standards and actions to achieve those performance standards.		
REC-5-In-lieu Fees	CDFW recommends that the project proponent recirculate the DPEIR for more meaningful public review and assessment of the project proponent's in-lieu fee. Additionally, the Project proponent should recirculate the DPEIR if the proposed mitigation measure (i.e., in-lieu fee) would not reduce potential effects to less than significant and new measures must be required [CEQA Guidelines, § 15073.5(b)(2)].	Prior to finalizing PEIR	TVMWD
REC-6-Nesting Birds	The Project's proposed Mitigation Measure BIO-2, *Nesting Birds*, as it is currently proposed, Project activities occurring during the bird and raptor breeding and nesting season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. CDFW recommends TVMWD amend Mitigation Measure BIO-2 to exclude the strikethrough and include the underlined language: "[…] The nesting season generally extends from February 1 through ~~August 31~~ September 15 (as early as January 1 for some raptors), but it can vary slightly from year to year based on seasonal weather conditions. If ground disturbance and vegetation removal cannot occur outside of the qualified Avian Biologist's-verified nesting season, a preconstruction clearance survey for nesting birds shall be conducted within 30 days within a 500-foot radius of the construction site. Based on local conditions, the nesting bird surveys should be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. Surveys shall be conducted no more than 7 days prior to the of the start of any construction. If Project activities are delayed or suspended for more than 7 days during the breeding season, repeat surveys should be repeated. If no active nests are found, no further action would be required.[…]"	Prior to finalizing PEIR /During/After project	TVMWD/project-level lead agency

REC-7-Rare Plant Surveys	The Project's proposed Mitigation Measure BIO-3, *Additional Biological Resources Assessments*, as it is currently proposed, may result in missed detections of rare plants not previously known to occur at a project site. This may result in population declines or local extirpation of a rare plant species, as there is potential for approximately 24 species of rare plants to occur within the Project boundary, according to BRA Table 2. CDFW recommends TVMWD amend Mitigation Measure BIO-3 to include the underlined language: "[…] a biological assessment shall be made, while identifying and mapping all vegetation communities and land-cover types, of the selected or potential sites to determine if sensitive biological resources (listed, candidate, or other special-status plants and/or wildlife, sensitive plant community, sensitive species, jurisdiction waters) are present. To determine presence/absence or accurately identifying rare plants, a qualified botanist shall conduct multiple rare plant surveys throughout the growing season for any given year. Surveys shall occur during the time of year when rare plants are more likely to be visually detectable. Rare plant surveys proceeding after a low water year shall be supplemented with one or two additional rare plant surveys over a number of years depending on the rare plant species, annual weather patterns, and whether the project area was recently disturbed (e.g., fire).[…]	Prior to finalizing PEIR /During/After project	TVMWD/project-level lead agency
REC-8-Rodenticides	CDFW recommends TVMWD exclude the use of second-generation anticoagulant rodenticides for all subsequent individual projects.	Prior to finalizing PEIR /During/After project	TVMWD/project-level lead agency
REC-9-Data	Project-level lead agencies should ensure sensitive and special status species data has been properly submitted to the California Natural Diversity Database with all data fields applicable filled out. Confirmation of data submittal should be provided to CDFW.	Prior to finalizing/ adopting project-level	Project-level lead agency

		CEQA document	
REC-10- Mitigation and Monitoring Reporting Plan	TVMWD should update the Project's proposed Biological Resources Mitigation Measures and condition the environmental document to include mitigation measures recommended in this letter. TVMWD is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures.	Prior to finalizing PEIR	TVMWD

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Letter 1 California Department of Fish and Wildlife

Comment 1-1 CDFW's Role. This comment includes a brief summary of CDFW's role as a Trustee agency and as a Responsible agency to review and comment on the Draft Program EIR.

Response 1-1 TVMWD acknowledges CDFW's role in reviewing the Draft Program EIR and providing comments regarding biological resources that may be affected by future projects identified in the Six Basins Strategic Plan. In addition, TVMWD and other Watermaster Parties that will undertake subsequent projects within the Six Basins project area understand that implementation of such projects may require consultation with CDFW to obtain appropriate authorization under the Fish and Game Code.

Comment 1-2 Project Description and Summary. This comment provides a summary of the background and description of the proposed Strategic Plan and its related projects.

Response 1-2 The comment has correctly summarized the purpose and need for the implementation of the Six Basins Strategic Plan to update the Watermaster's Operating Plan, and to implement new projects to optimize conjunctive water management in order to sustainably manage groundwater within the Six Basins.

Comment 1-3 Groundwater Dependent Ecosystems. The Project may impact biological resources located in areas identified with groundwater dependent ecosystems (GDE). In addition, these ecosystems do not seem to be identified in the Draft Program EIR. The Project may cause local extirpation of wildlife from otherwise suitable habitat through increasing pumping efforts and constructing recharge improvements facilities. The construction of these facilities may remove habitat and alter groundwater levels, significantly impacting GDEs. **(CDFW Comment 1)**

Response 1-3 The Six Basins are six interconnected groundwater basins located along the base of the San Gabriel Mountains. Regionally, the Six Basins underly a portion of the Eastern San Gabriel Valley in Los Angeles County, and the City of Upland, and the unincorporated community of San Antonio Heights in western San Bernardino County. The project area is an urbanized area along the base of the mountains. Draft EIR Figure 3-4, *Adjudicated Boundary*, shows the relationship between the source of the water and the groundwater basins. As shown in this figure, the area overlying the groundwater basins is largely urban. Most native vegetation has been replaced with ornamental vegetation consisting of a variety of non-native trees, shrubs, and groundcover.

The exception to this is found within the San Antonio Spreading Grounds (SASG) area associated with the San Antonio Creek wash; the area around the Thompson Creek Dam, including the Thompson Creek Spreading Grounds (TCSG); and an area near the northeast corner of Foothill Blvd and Indian Hill Blvd in the City of Claremont associated with the Rancho Santa Ana Botanical Gardens and other vacant land associated with the

Claremont Colleges. The areas within the SASG and TCSG are largely vacant with the exception of the numerous flood control and water conveyance systems, located within each site.

Final EIR Figure 1, Depth to Groundwater in the Six Basins, Fall 2020, is an update to Draft EIR Figure 2-12, Historical Areas of Rising Groundwater and Depth to Groundwater in January 2006, which showed depth to groundwater in 2006. In the interim 14 years, there has been a lowering of the depth to groundwater such that in 2020, groundwater levels were lower in the SASG area than in 2006, reflecting drought conditions experienced in the area over this time period. For example, within the area outlined as the SASG, groundwater levels in 2006 ranged in depth between 100 feet below ground surface (bgs) at the base of the San Antonio Dam and 250 bgs near the southeastern area of the SASG. In 2020, the groundwater levels ranged in depth between 100 feet bgs at the base of the dam to 350 feet bgs toward the southern area of the SASG. Likewise, the groundwater levels in proximity to the TCSG were lower in 2020 than in 2006.

Final EIR Figure 2, Natural Communities Commonly Associated with Groundwater in the Six Basins, illustrates data obtained from the Department of Water Resources Natural Communities Commonly Associated with Groundwater Dataset. DWR's data shows areas within the Six Basins adjudicated boundary including areas within the SASG and TCSG. Based on DWR's dataset, small groundwater dependent ecosystems may occur within the boundaries of the SASG and TCSG project areas as well as in a smaller area west and south of the Pedley Spreading Grounds. However, research completed by project biologists during the preparation of the Biological Resources Assessment for the Draft Program EIR, including a review of groundwater data provided in the Six Basins Strategic Plan, found that the depth to groundwater was between 100 and 350 feet bgs, and at the Pedley Spreading Grounds at or near 150 feet bgs for several years.

The continuous implementation of stormwater control and groundwater recharge over the past 100+ years has affected the SASG and TCSG project areas, particularly in the SASG where a combination of the San Antonio Dam and the channelization of San Antonio Creek have reduced the water supply available to the existing vegetation in the SASG, resulting in the maturation of the Riversidean Alluvial Fan Sage Scrub (RAFFS). In addition, any identified streams within these project areas are disconnected ephemeral surface waters (only during a storm event or a release from a turnout) due to the presence of the dams and the channelization of San Antonio Creek and Thompson Creek, thus there is a lack of a continuous saturation zone beneath the ephemeral water features to the underlying aquifer. Under these conditions, lowering of the groundwater table within the project area through downstream pumping would not affect the rate of loss of surface water, since surface waters are controlled either behind a dam or in a concrete channelized creek. Likewise, due to depth to groundwater below the SASG and TCSG, the rise in groundwater levels during recharge would not be to a level where it would be available to the root system of GDEs.

With regard to mitigation measure #1, based on the above information on disconnected surface waters and depth to groundwater, the project biologist determined that there are no GDEs located in the TCSG or SASG project areas and, thus, GDEs would not be affected by the proposed new recharge basins. Due to the topography of the area, recharge water that percolates into the ground in the existing spreading grounds, does not remain in place. Rather this groundwater flows southerly into the Lower Claremont Heights Basin (LCHB) and the Pomona Basin where it is pumped and treated for municipal water use. Therefore, installing injection wells or developing additional recharge basins would not likely increase groundwater levels so that there is a saturated zone between the surface aquatic feature and the underlying groundwater, needed to create and sustain groundwater dependent ecosystems.

Finally, regarding the recommendation for a subsequent CEQA document to verify the existence of such ecosystems, at such time as the recharge basin for either the SASG or TCSG is designed, site specific studies will be required including the biological resources assessment identified in mitigation measure BIO-3. See response to comment 1-4 (CDFW comment 2).

Comment 1-4 California Fully Protected Bird Species. The Project may impact California Fully Protected bird species. According to Table 2 of the BRA, California black rail (*Laterallus jamaicensis coturniculus*), a California Fully Protected bird species, has potential to occur within the Project boundary. In addition, according to ebird, American peregrine falcon (*Falco peregrinus*) has been recorded multiple times within the Project boundary.

Project construction and activities, directly or through habitat modification, may result in injury or mortality, reduced reproductive capacity, population declines, or local extirpation of these California Fully Protected bird species. Temporal or permanent loss of foraging, breeding, nesting, or nursery habitat may occur. In addition, diverting water from its current course may impact the availability of water for various bird species or habitats supporting birds, impacting the ability of Fully Protected species to persist within the Project boundary. **(CDFW Comment 2)**

Response 1-4 Because the environmental evaluation of the Strategic Plan was undertaken at a programmatic level, the biological field surveys were conducted in the general area where the future recharge basins in the SASG and TCSG would be located. The Biological Resources Assessment (Draft Program EIR Appendix C) concluded that due to site conditions including several man-made features such as dams, creeks diverted into concrete channel, existing water diversion features, electric transmission lines supported by steel towers, unpaved roads, etc., and the quality of the vegetation (mature RAFSS effected by long-term water diversion), habitat quality for sensitive plant and wildlife is low.

Adoption of the Six Basins Strategic Plan and certification of the Final Program EIR for the Plan does not mean that individual projects are approved, and construction is

imminent. After certification of the Program EIR by the lead agency, each Watermaster Party proposing a subsequent, related project (either identified in the Strategic Plan or a future project not currently known), including the PVPA's SASG and TCSG projects, is responsible for ensuring CEQA compliance, and compliance with all other responsible or trustee agency requirements.

Therefore, once the design of a project including identifying the footprint of the facility and area of disturbance but prior to commencement of construction activities, the Watermaster Party proposing the project will be completing a number of site studies including a site-specific Biological Resource Assessment; and a subsequent environmental assessment in the form of an Initial Study. The Initial Study would be based on a review of the proposed project as evaluated in the Program EIR, as well as the results of any new studies prepared for a project, and based on the whole record, a determination would be made whether a Mitigated Negative Declaration or a Subsequent EIR should be prepared. It is at this time that mitigation measures identified in Mitigation Monitoring and Reporting Program (MMRP), would be implemented, including surveys for nesting birds, and additional biological assessments for sensitive biological species site-specific mitigation measures would be conducted, if required. Under CEQA, the applicant is required to notify CDFW of the proposed project and its potential impacts on plant and wildlife species. It is at this time, when site-specific mitigation measures would be discussed with CDFW.

Mitigation measure BIO-3 has been revised (new text) to clarify that additional biological resources assessments shall be conducted for all future projects where ground disturbing activities would occur when undertaking a project that falls into either Project Category 2 or 3. Future site activities identified in Project Category 1 would all occur on existing sites in urban areas and thus would not require that site surveys be conducted. Note, in response to CDFW comment 1-9b, additional text has been included to clarify the intent of preparing a mitigation strategy for the take of a species of special concern.

BIO-3 *Additional Biological Resources Assessments*. Prior to the approval of future projects on sites not identified in this EIR and occurring within an undeveloped area, or sites within the SASG or TCSG where new recharge basins and related infrastructure are proposed, a biological assessment shall be made of the selected or potential sites to determine if sensitive biological resources (sensitive plant community, sensitive species, jurisdiction waters) are present. If a sensitive biological resource is present, an analysis will be made of the potential for impact to the resource, an appropriate mitigation strategy will be developed and submitted to the wildlife and regulatory agencies with authority to review and approve the mitigation strategy as reducing impacts to less than significant. Either appropriate avoidance ~~and~~ or minimization measures will be developed to offset any potential impact or offsite mitigation shall be provided to offset the impact. Where a species is State-listed, CDFW would require full mitigation under an Incidental Take Permit. At a minimum, the mitigation strategy shall (1) identify the affected SSC; (2) identify strategies for handling and relocation of individuals

per CDFW guidance, and (3) identify compensatory mitigation for temporary or permanent loss of habitat that supports SSC (ratio to be determined in consultation with CDFW) and/or through acquisition of an Incidental Take Permit if a state listed or candidate species is determined to be present.

Comment 1-5 San Bernardino Kangaroo Rat. Project activities at the SASG may impact San Bernardino Kangaroo Rat (*Dipdomys merriami* parvus; SBKR) habitat. The Project may result in temporary or permanent impacts or removal of SBKR habitat, crushing or filling of active colonies, causing the death or injury of adults or juveniles. Impacts may result from ground disturbing activities (e.g., staging, mobilization, and grading), vegetation removal, increased noise disturbances, light, human activity, and dust associated to the creation of new spreading grounds. In addition, diverting water from its current course may decrease the availability of water for SBKR or habitats supporting SBKR, impacting the ability of the species to persist within the Project boundary. **(CDFW Comment 3)**

Response 1-5 As discussed in Response 1-3 above, because the environmental evaluation of the Strategic Plan was undertaken at a programmatic level, the biological field surveys were conducted in the general area where the future recharge basins in the SASG and TCSG would be located. During those surveys a general assessment of habitat quality was made and conclusions reached regarding the potential for special status species to occur. The conclusion of the project biologist was that there is no suitable habitat for SBKR and that the occurrence potential is low. Final EIR Figure 3 shows CNDDB observations within a 5-mile radius of the SASG project site. As shown here, there are no recorded observations of SBKR within that 5-mile radius.

However, as discussed above in response to comment 1-4, mitigation measure BIO-3 has been revised to require additional biological resources assessments be conducted prior to commencement of any ground disturbing activities on sites within Project Categories 2 and 3. Project Category 2 includes activities in the SASG and TCSG project areas. Field surveys will be conducted at such time as the footprint of each recharge basin is known. This is in line with CDFW's SBKR mitigation measure #1.

As stated in mitigation measure BIO-3, "If a sensitive biological resource is present, an analysis will be made of the potential for impact to the resource, an appropriate mitigation strategy will be developed and submitted to the wildlife and regulatory agencies with authority to review and approve the mitigation strategy as reducing impacts to less than significant. Either appropriate avoidance and minimization measures will be developed to offset any potential impact or offsite mitigation shall be provided to offset the impact. Where a species is State-listed, CDFW would require full mitigation under an Incidental Take Permit." This is in line with CDFW's SBKR mitigation measure #2 that requires an applicant to apply for an Incidental Take permit.

Comment 1-6 Crotch's Bumble Bee. A search of CNDDB has indicated four occurrences of Crotch's bumble bee within and adjacent to the Project boundary. The

Project may result in temporal or permanent loss of suitable nesting and foraging habitat. Project ground-disturbing activities may cause death or injury of adults, eggs, and larva; burrow collapse; nest abandonment; and reduced nest success. **(CDFW Comment 4)**

Response 1-6 As part of the Biological Resources Assessment prepared for the Draft Program EIR (Draft EIR Appendix C), the desktop search of literature and databases included a search of the CNDDB for species with the potential to occur in the project area. Crotch's bumblebee was identified during the search. However, based on the field surveys completed in the project area, the project biologist concluded that there was no suitable habitat for this species and that the occurrence potential for the species is low.

The studies completed for the Six Basins Strategic Plan Program EIR were conducted at a programmatic level because the schedule for construction of the new recharge basins is unknown, and the exact footprint of the new recharge basins has not been established Therefore, once the design of a project including identifying the footprint of the facility and area of disturbance but prior to commencement of construction activities, the Watermaster Party proposing the project will be completing a number of site studies including a site-specific Biological Resource Assessment; and a subsequent environmental assessment in the form of an Initial Study. The Initial Study would be based on the results of any new studies prepared for a project, and based on the whole record, a determination would be made whether a Mitigated Negative Declaration or a Subsequent EIR should be prepared.

With regard to mitigation measures #1, this measure describes a standard format for a survey report that is routinely followed by biologists preparing biological resources assessments. If suitable habitat is found at a project site, then an entomologist would be the logical person to conduct focused surveys for the species. Therefore, standard practice for conducting field surveys would be followed.

With regard to mitigation measures #2 and #3, if during subsequent field surveys for a project identify the presence of Crotch's bumblebee, the biological resources report for the project would include appropriate mitigation measures, including consultation with CDFW.

Also see response to comment 1-4 where mitigation measure BIO-3 has been modified to require additional biological resources assessments be completed for the new recharge basins in the SASG or TCSG. At this time, the project biologist will reassess the habitat and determine if the development of new recharge basins at the specific locations identified in subsequent siting studies would impact sensitive species including Crotch's bumblebee.

Comment 1-7 <u>Water Diversion and Impacts to Streams</u>. The Project may divert surface stormwater and urban runoff for projects, such as those at the Pedley Spreading Grounds (PSG) and the LA County Fairplex (Fairplex). The Project may modify water

received or discharged into channels throughout the Project boundary and install new diversion structures to spreading grounds. This may result in impacts to streams.

Diverting stormwater and runoff into stormwater catchment basins or infiltration galleries may reduce the availability and extent of water flow. Modifications to channels and installation of diversion structures may result in temporary or permanent impacts to a stream. There could be changes to the hydrologic regime both within the immediate area and downstream. Changes to the hydrologic regime could affect abiotic and biotic variables that support plants, fish, wildlife, and macroinvertebrates. Significant impacts to biological resources could occur, especially during a dry season proceeding after a below-average water year. **(CDFW Comment 5)**

Response 1-7 Pedley Spreading Grounds (PSG) is an existing facility used by the City of Pomona as spreading grounds for water diverted from San Antonio Creek via the Canon Pipeline that surpasses the Pedley Treatment Plant capacity, high turbidity flows, and/or treatment plant backwash. There is currently no stormwater runoff from the surrounding neighborhoods conveyed to the PSG.

Upgrading the PSG site to accommodate local urban runoff would create a new diversion of drainage captured from the surrounding urban area. The area is currently served by an existing storm drain system, and any stormwater collected within this drainage area would be diverted away from its current direction of flow and into the PSG recharge basins. Therefore, the second paragraph of page 4-156 under the heading *Pedley Spreading Grounds* has been amended to clarify that the mitigation measure BIO-3, to conduct a subsequent biological resources assessment to determine if the proposed project would adversely affect biological resources, including downstream riparian habitat would apply to this project. Implementation of this measure would not occur until such time as this project is in the design stage where enough information about the project is known and a CEQA Initial Study can be prepared.

> A general assessment of jurisdictional waters was not completed for the Pedley Spreading Grounds (PSG) site, nor was a field survey completed at the site. The PSG site consists of small basins that are fed by a pipeline that conveys water from behind the San Antonio Dam through the pipeline and into the basins located in a residential neighborhood in the City of Claremont. There are no natural drainage features that provide water to the PSG and there is no outlet from the PSG site into any drainage feature such as a creek or flood control channel. Expansion of the PSG consists of widening and deepening the existing basins and providing additional water from the local storm drain system through a new pipeline. No outlet from the PSG site is envisioned for this project, therefore, there is no impact on jurisdictional waters or wetlands associated with the PSG project <u>at the project site</u>.

> However, the diversion of stormwater from the existing stormdrain system to the PSG could negatively affect downstream habitat that is dependent on that stormwater. Therefore, during the planning/design phase of the PSG site, the Watermaster Party proposing this project shall implement mitigation measure BIO-3 which requires the preparation of a biological resources assessment to determine if sensitive biological resources (sensitive plant community, sensitive species, jurisdiction waters) are present. In addition, if the assessment determines that the project would impact a jurisdictional water (Waters of the State or US), then implementation of mitigation measure BIO-4 to consult with regulatory agencies is also required.

Likewise, the Fairplex project site is located in an urban area surrounded by the Fairplex site itself, as well as surrounding residential, commercial and industrial uses. There is an existing stormdrain system in place including the concrete channelized Thompson Creek that is adjacent to the Fairplex site. The intent of the proposed Fairplex project is to capture, treat and discharge stormwater into an underground infiltration system. The project is still conceptual however, the project would likely include a catch basin that captures stormflows and conveys them into a hydrodynamic separator for pretreatment before being conveyed into the infiltration gallery. It is intended that any overflow from the infiltration gallery will discharge back into Thompson Creek.

The first paragraph on page 4-157 of the Draft EIR states that although the Thompson Creek channel in the vicinity of the LA Fairplex is concrete lined, it is tributary to the San Gabriel River and at the confluence between the creek and the river, the river is unlined and exhibits riparian features. Therefore, mitigation measure BIO-4, has been identified to ensure that should construction or operation activities associated with the Fairplex recharge facilities, regarding conveyance of water from Thompson Creek, would be less than significant. Mitigation measure BIO-4 requires consultation with resources agencies for projects that has the potential to affect riparian habitat or wetlands. In response to CDFW comment, mitigation measure BIO-4 has been revised (see below for new text) to indicate what will be required for the Watermaster Party proposing an MS-4 project to provide to CDFW as part of the Lake and Streambed Alteration application. The Six Basins Strategic Plan Program EIR is a programmatic document that assessed the environmental impacts of plan implementation, including identifying a set of projects that would be developed in order to meet the Watermaster's goals for a more reliable and sustainable water supply. However, none of the projects identified in the Strategic Plan have been designed so site-specific studies have not been completed at this time. At such time as the Fairplex project is in the planning/design phase, a subsequent environmental document, either a subsequent mitigated negative declaration or subsequent EIR, would be prepared tiered from the Six Basins Strategic Plan Program EIR. At that time, project-level studies and assessments would be done for each project, and a determination of the types of permits or agreements with regulatory and resources agencies would be determined, and consultation with those agencies, including the application for an LSA for the Fairplex project would occur.

The discussion of the Fairplex project has been revised to reflect that during the planning/design phase of the project, the Waermaster Part proposing this project, shall implement mitigation measures BIO-3 as follows:

> Although the Thompson Creek channel in the vicinity of the LA Fairplex is concrete lined, it is tributary to the San Gabriel River and at the confluence between the creek and the river, the river is unlined and exhibits riparian features. Therefore, mitigation measure BIO-3 has been identified to requires the Watermaster Party proposing this project shall prepare a biological resources assessment that addresses the diversion of stormwater from the existing stormdrain system to the underground infiltration gallery that could negatively affect downstream habitat that is dependent on that stormwater. Therefore, during the planning/design phase of the Fairplex site, the Watermaster Party proposing this project shall prepare a biological resources assessment to determine if sensitive biological resources (sensitive plant community, sensitive species, jurisdiction waters) are present.

Mitigation measure BIO-4 requires a Watermaster Party undertaking a project that could result in permanent impacts to jurisdictional waters (USFWS or CDFW), must consult with the resources agencies. The Program EIR for the Six Basins Strategic Plan does not approve any individual projects. After certification of the Program EIR by the lead agency, each Watermaster Party proposing a subsequent, related project (either identified in the Strategic Plan or a future project not currently known), including the City of Pomona's PSG and Fairplex projects, is responsible for ensuring CEQA compliance, including implementation of the mitigation monitoring and reporting program, and compliance with all other responsible or trustee agency requirements.

As recommended by this comment, mitigation measure BIO-4 has been revised to include additional text as follows:

BIO-4 *Wetland Permits or Streambed Alteration Agreement*. Prior to approval of a project where permanent impacts in areas determined to be potential jurisdictional wetlands or riparian features, Waters of the State or Waters of the U.S., the Watermaster Party undertaking a project shall consult with the regulatory agencies (USACE, RWQCB and CDFW) to determine if a CWA 404 permit, CWA 401 or a Streambed Alternation Agreement under Fish and Game Code 1602 are required prior to development. Based on a notification pursuant to Fish and Game Code section 1602 and other information, CDFW will determine whether a Lake and Streambed Alteration (LSA) Agreement is required prior to conducting proposed activities. An LSA Notification shall include the following: 1) an analysis to demonstrate that concrete-lined or soft-bottom channels would not be impaired (e.g., aggraded, incised, increased suspended sediment), 2) a hydrological evaluation of the 100, 50, 25, 10, 5, and 2-year frequency storm event

for existing and proposed conditions, 3) whether dewatering/diversion of water may be necessary, and (if applicable) 4), an analysis of whether diversion structures would impact stormwater and dry season water flow, and the extent of those impacts, during the wet season (November through March), dry season (April through October), and both above-average and below-average water year.

The following shall be incorporated into the permitting subject to approval by the regulatory agencies:

a) On- or offsite replacement of USACE/RWQCB jurisdictional waters of the U.S./waters of the State at a ratio no less than 1:1 for permanent impacts and to restore the site to pre-project conditions for temporary impacts. Offsite replacement may include the purchase of mitigation credits at an agency-approved offsite mitigation bank or in-lieu fee program.
b) On- or offsite replacement of CDFW jurisdictional streambed and associated riparian habitat at a ratio no less than 2:1 for permanent impacts and to restore the site to pre-project conditions for temporary impacts. Offsite replacement may include the purchase of mitigation credits at an agency-approved offsite mitigation bank or in-lieu fee program.

Comment 1-8 Impacts on Riparian Habitat. The Project may impact riparian habitat. The Project may result in temporary or permanent loss of riparian resources. **(CDFW Comment 6)**

Response 1-8 Impacts to riparian habitat through the development of Project Category 2, *Stormwater and Supplemental Recharge*, projects were identified in the Program EIR, particularly related to new recharge basins at the SASG and TCSG project areas. Project biologists visited the project areas at three different times during the preparation of the EIR in June/July 2019, in June 2020, and again in February 2021. Over this approximately 2.5-year period, biologist concluded that fluvial processes have been substantially modified over the past 100 years in both the SASG and TCSG. In the SASG such processes have been modified by the San Antonio Dam, the channelization and lining (concrete) of San Antonio Creek, the development of recharge basins on both sides of the channel below the dam, and the development of aggregate mine pits.

Draft EIR Figure 2-8 (included as an attachment to this response) shows the SASG and the various man-made features that have interrupted the fluvial process in that wash. The flow paths depicted on this figure represent how water flows when it is released from a turnout. Any water that flows in the channel and is turned out is controlled by the Army Corps of Engineers, and only when there is water behind the dam. Otherwise, there is no water to release. When there is water released the first priority is to divert it to the existing recharge basins below the dam.

The habitat in both the SASG and TCSG project areas was characterized as mature Riversidean alluvial fan sage scrub (RAFSS). RAFSS requires fluvial processes to maintain the openness of the habitat and to deposit sand soils utilized by many of the wildlife

species associated with RAFSS habitat. However, as fluvial processes are interrupted - as they have been within both project areas - the habitat is no longer subject to routine or major storm events. RAFSS habitat on fringes of a wash system or outside the100-year floodplain that no longer exposed to scouring, continue to mature (senescence) into woodier vegetation normally associated with chaparral habitats. Both *Ceanothus crassisfolius* and *Ceanothus leucodermus,* chaparral species, were identified within the SASG and TCSG project areas. Plant cover in mature RAFSS habitat usually exceeds 75 percent. The lack of open habitat in mature RAFSS precludes many of the sensitive species associated with pioneer and intermediate RAFSS habitats from occurring.

The Biological Resources Assessment (Draft EIR Appendix C) included an evaluation of potential jurisdictional water being present within the SASG and TCSG project areas. Aerial imagery of the project sites was examined and compared with the surrounding USGS 7.5-minute topographic quadrangle maps to identify drainage features within the survey area as indicated from topographic changes, blue-line features, or visible drainage patterns. The U.S. Fish and Wildlife Service National Wetland Inventory and Environmental Protection Agency (EPA) Water Program "My Waters" data layers were also reviewed to determine whether any hydrologic features and wetland areas had been documented within the vicinity of the site. Similarly, the Soil maps from the U.S. Department of Agriculture (USDA) - Natural Resources Conservation Service (NRCS) Web Soil Survey (USDA 2018) were reviewed to identify the soil series on-site and to check if they have been identified regionally as hydric soils. Upstream and downstream connectivity of waterways (if present) was reviewed in the field, on aerial imagery, and topographic maps to determine jurisdictional status. No obvious signs of jurisdictional features occur within the SASG and TCSG project sites.

The Program EIR for the Six Basins Strategic Plan does not approve any individual projects. After certification of the Program EIR by the lead agency, each Watermaster Party proposing a subsequent, related project (either identified in the Strategic Plan or a future project not currently known), including recharge basin projects, is responsible for ensuring CEQA compliance, including implementation of the mitigation monitoring and reporting program, and compliance with all other responsible or trustee agency requirements.

Therefore, once the design of a project including identifying the footprint of the facility and area of disturbance but prior to commencement of construction activities, the Watermaster Party proposing the project will be completing a number of site studies including a site-specific Biological Resource Assessment; and a subsequent environmental assessment in the form of an Initial Study. The Initial Study would be based on a review of the proposed project as evaluated in the Program EIR, as well as the results of any new studies prepared for a project, and based on the whole record, a determination would be made whether a Mitigated Negative Declaration or a Subsequent EIR should be prepared. It is at this time that mitigation measures identified in Mitigation Monitoring and Reporting Program (MMRP), would be implemented, including surveys for nesting birds, additional biological assessments for sensitive biological species site-

specific mitigation measures may be required. Under CEQA, the applicant is required to notify CDFW of the proposed project and its potential impacts riparian features and/or habitat. It is at this time that site-specific mitigation measures would be discussed with CDFW.

Mitigation measure BIO-3 has been revised (see response to comment 1-7 – CDFW comment #5) to clarify that additional biological resources assessments shall be conducted for all future projects where ground disturbing activities would occur when undertaking a project that falls into either Project Category 2 or 3. Future site activities identified in Project Category 1 would all occur on existing sites in urban areas and thus would not require that site surveys be conducted. Note, in response to CDFW comment 1-4, additional text has been included to clarify the intent of preparing a mitigation strategy for the take of a species of special concern.

Comment 1-9 California Species of Special Concern. The Project may impact California Species of Special Concern (SSC). According to Table 2 of the BRA, the Project area has the potential to support SSC, which includes two avian species, one fish, four amphibians, five reptiles, and six mammals.

Project construction and activities, directly or through habitat modification, may result in direct injury or mortality (trampling, crushing), reduced reproductive capacity, population declines, or local extirpation of an SSC. Temporal or permanent loss of foraging, breeding, nesting, or nursery habitat for an SSC may occur. **(CDFW Comment 7)**

The Biological Resources Assessment prepared for the Program EIR included field surveys for an approximately 195-acre survey area within the larger SASG within which the proposed approximately 50-acre recharge basin would be developed. The field surveys occurred in late June and early July 2019, a year when the Six Basins project area received 43.8 inches of rainfall. By comparison, the area received 17.8 inches of rainfall in 2018. Therefore, the survey dates in 2019 represent an optimal period in which to conduct field surveys. In June 2020, a project biologist returned to the area to verify existing conditions. This was followed up by an additional visit by a project biologist in February 2021. These field surveys were all general reconnaissance surveys within the project study areas (project sites plus surrounding area) in order to identify the potential for the occurrence of special status species, vegetation communities, or habitats that could support special status wildlife species.

The habitat in both the SASG and TCSG project areas was characterized as mature Riversidean alluvial fan sage scrub (RAFSS). RAFSS requires fluvial processes to maintain the openness of the habitat and to deposit sand soils utilized by many of the wildlife species associated with RAFSS habitat. However, as fluvial processes are interrupted - as they have been within both project areas - the habitat is no longer subject to routine or major storm events. RAFSS habitat on fringes of a wash system or outside the100-year floodplain that no longer exposed to scouring, continue to mature (senescence) into

woodier vegetation normally associated with chaparral habitats. Both *Ceanothus crassisfolius* and *Ceanothus leucodermus,* chaparral species, were identified within the SASG and TCSG project areas. Plant cover in mature RAFSS habitat usually exceeds 75 percent. The lack of open habitat in mature RAFSS precludes many of the sensitive species associated with pioneer and intermediate RAFSS habitats from occurring.

No focused surveys were conducted during this time because the BRA was prepared in support of a Program EIR for a Strategic Plan that identified a number of projects to be completed over a 20-year period with no specific schedule for completion of a project. In addition, prior to conducting subsequent BRAs at project sites, the Watermaster Party proposing a project would provide the project biologist with at least the preliminary design of the project including the footprint for the recharge basins and related features such as an access road and the future pipeline alignment to convey water between an existing turnout (see Draft EIR Figure 2-8 for location of turnouts) and the new recharge basin. Therefore, it is premature for the BRA for the Program EIR or the Program EIR itself, to include mitigation strategies for preservation, enhancement or restoration, when project specific impacts are unknown. A subsequent BRA prepared at such time as an individual project is proposed and site design plans are available, would include the biologist's findings and recommendations for mitigation strategies if an SSC is identified on a project site.

At this time, there is no design available for the recharge basin either in the SASG or TCSG. When a BRA for a project is prepared, and field surveys conclude that a SSC may be taken as a result of the construction or operation of the project, the Watermaster Party proposing the project would be required to apply for an Incidental Take Permit under Section 2081 of the Fish and Game Code. It is at this time, when impacts are known at the project level, that consultation with CDFW, including discussion of mitigation strategies would be required.

Regarding mitigation measures outlined in this comment, the lead agency agrees that should a future conjunctive water management project have the potential to "take" an individual SSC, the Watermaster Party proposing the project shall prepare a mitigation strategy as set forth in revised mitigation measure BIO-3, that includes the following: (1) identifies the affected SSC; (2) identifies strategies for handling and relocation of individuals per CDFW guidance, and (3) identifies compensatory mitigation for temporary or permanent loss of habitat that supports SSC. Therefore, mitigation measure BIO-3 has been revised to incorporate this new text (see response to comment 1-4, CDFW comment #2.

Comment 1-10 Tree Removal. The Draft Program EIR indicates projects may require tree trimming or removal. Project activities that result in the removal of trees may cause temporary or permanent impacts to wildlife that utilize the tree as habitat. In addition, native tree species could be removed, causing further declines in native vegetation. **(CDFW Comment 8)**

Response 1-10 The discussion of the potential for trees to be removed or trimmed at a project site was intended to address local agency emphasis on urban forestry. The intent was to ensure that during construction and maintenance activities, mature trees are not disturbed without authorization from a city such as Claremont or La Verne that have specific tree ordinances. As written, mitigation measure BIO-1 refers is specific to heritage trees. City of Claremont's *Tree Policies and Guidelines Manual* (https://www.ci.claremont.ca.us/home/showpublisheddocument/15028/637309208415570000) and the City of La Verne's *Wilderness Area Management and Public Access Plan* (https://www.cityoflaverne.org/index.php/documents/community-development-planning/wilderness-management-plan) were reviewed in the preparation of Draft PEIR Section 4.4 with regard to urban trees. The measure does not address other trees that may be disturbed in areas not covered by a city ordinance or one of the cities' plans.

Mitigation measures BIO-2, *Nesting Birds*, was intended to cover all other vegetation, including trees, at any of the conjunctive water management projects covered by the Six Basins Strategic Plans. The intent of this measure is to ensure that the removal or trimming of vegetation that could provide habitat for birds must be addressed prior to commencement of any site disturbing activities, including tree trimming.

To address CDFW's concern regarding habitat for wildlife species, mitigation measure BIO-1 shall be expanded to include any type of tree found on a project site that would be removed or trimmed as part of a Strategic Plan project. In addition, mitigation measure BIO-1 has been renumbered as BIO-1a to indicated that a related measure, as recommended by CDFW, be included to address the potential for pests and plant pathogens to spread to other nearby trees. Mitigation measure BIO-1b is identified in response to CDFW comment 1-11 below.

For other trees, including native trees that may be impacted by a Strategic Plan project, the Watermaster Party proposing a project shall hire a qualified arborist to assess the health of a tree(s) and determine whether trimming a tree would prove detrimental to the tree. In such a case, or if a tree is removed, replacement of trees shall be required and new trees shall be native trees whether the tree removed is native or non-native.

Comment 1-11 Tree Diseases, Pests and Pathogens. The Project may remove trees and spread material infected with invasive tree diseases, pests, and pathogens. The Project may spread tree insect pests and diseases into areas not currently exposed to these stressors. This could result in expediting the loss of native trees and plant communities. Loss of trees may result in loss of foraging and perching habitat for small mammals, birds, and raptors. **(CDFW Comment 9)**

Response 1-11 This comment is specific to areas within the Six Basins project area where native trees may be located within a Strategic Plan project site, either for a project identified in the Strategic Plan, or other future project (e.g., new well site) where the project site has not been selected. The Biological Resources Assessment prepared for the Six Basins Program EIR (Draft EIR Appendix C) identified one species identified in this

comment – coast live oak (*Quercus agrifolia*) - observed within the western portion of the study area of the TCSG. However, because the final footprint of either the TCSG or SASG, or future project site not yet identified, is unknown, mitigation measure BIO-3, *Additional Biological Resources Assessments*, was identified (see responses to CDFW comments 1-4 and 1-9), requiring additional site surveys be performed prior to commencement of ground disturbing activities. Implementation of mitigation measure BIO-3 would result in the preparation of a subsequent BRA at a project site which would include identification of any native trees that may be impacted.

However, to specifically address response to comment 1-11 (CDFW Comment #10), mitigation measure BIO-1b, *Removal of Native Trees*, would be undertaken at project sites where native trees would be affected (trimming or removal).

BIO-1b Prior to commencement of ground disturbing activities where native trees may require trimming or removal), and to address the potential spread of invasive pests and diseases by implementing the following:

1) Prior to tree trimming or removal, a certified arborist shall evaluate trees for infectious tree diseases including but not limited to: sudden oak death (*Phytophthora ramorum*), thousand canker fungus (*Geosmithia morbida*), polyphagous shot hole borer (*Euwallacea* spp.), and goldspotted oak borer (*Agrilus auroguttatus*) (TCD 2021; UCANR 2021; Phytosphere Research 2012; UCIPM 2013).
2) If a certified arborist determines trees are impacted by infectious pests or diseases, the certified arborist shall prepare an *Infectious Tree Disease Management Plan* or develop a detailed, robust, enforceable, and feasible list of preventative measures. A plan/list shall provide measures relevant for each tree pest or disease observed. To avoid the spread of infectious tree pests and diseases, infected trees should not be transported from a project area without first being treated using best available management practices described in the *Infectious Tree Disease Management Plan* or list of preventative measures.
3) If possible, all tree material, especially infected tree material, shall be left on site. The material could be chipped for use as ground cover or mulch. Pruning and power tools should be cleaned and disinfected before use to prevent introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas.

Comment 1-12 In-lieu Fees. Mitigation Measure BIO-4 *Wetland Permits* mentions an "in lieu fee program" as an option for offsite replacement of wetland resources. Impacting wetland resources has the potential to impact directly, or indirectly through habitat loss, sensitive, special status, threatened, and/or endangered plants, wildlife, and vegetation communities. In addition, the Draft Program EIR does not provide sufficient information for CDFW to evaluate the adequacy of in-lieu fees to offset the cumulative loss of biological resources associated with wetlands. **(CDFW Comment 10)**

Response 1-12 As discussed in the Draft Program EIR *Biological Resources* (Section 4.4) no obvious signs of jurisdictional features were observed during the literature/aerial photograph review for either the SASG or TCSG project areas. During field surveys, the project areas were surveyed with 100 percent visual coverage and no drainage features were present within the survey area for either the SASG or TCSG. The discussion goes on the state that because the final location of the SASG and TCSG recharge basins are unknown, implementation of mitigation measure BIO-4 may be required should the one or both of the new facilities result in impacts to jurisdictional wetlands. However, at this time, no wetlands would be impacted by a Strategic Plan project.

The intent of mitigation measure BIO-4 is to ensure that should the final design of the recharge basins within the SASG and TCSG result in an impact to wetlands, consultation with regulatory agencies would be required, and suggested language that would be included in the permit application. The recommendations identified in this comment are premature because at this time, there are no projects with the potential to impact wetlands are proposed. However, at such time as a recharge basin project in the SASG or TCSG is proposed, additional studies are required (e.g., mitigation measures BIO-2 and BIO-3) and it is at this time that site specific mitigation measures would be identified.

Finally, regarding recirculation of the Draft Program EIR, because at this time, no wetlands have been identified on any of the project sites listed in the Strategic Plan. There is no requirement to revise and recirculate the Draft Program EIR to discuss in-lieu fees.

Comment 1-13 Filing Fees. The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required for the underlying Project approval to be operative, vested, and final (Cal. Code Regs., tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

Response 1-13 The lead agency will file the Notice of Determination with the State Clearinghouse and the Los Angeles County Clerk after certification of the Final Program EIR. The filing fee of $3,445.25 will be included with the NOD filed with the County Clerk.

Comment 1-14 Responses to CDFW comments and notification of public hearing dates. CDFW has requested an opportunity to review the lead agency's responses to its comments and to be notified of any forthcoming public hearings.

Response 1-14 The Final EIR, including responses to comments received on the Draft Program EIR will be provided to CDFW staff prior to the TVMWD public hearing on the project.

Comment 1-15 Attachment A: Draft Mitigation Monitoring and Reporting Program. CDFW has provided a number of mitigation measures in this attachment.

Response 1-15 The Draft EIR included a MMRP for projects within the three Project Categories – a separate MMRP for each Project Category. Where mitigation measures have been revised to reflect comments received from CDFW, these measures have been revised in the MMRP and included in the Final EIR. Other measures suggested in Appendix A have not been included as they relate to impacts that may not occur. Impacts associated with the construction and development of Strategic Plan projects will be assessed at the project level in separate subsequent CEQA documents as projects are put forward for design and environmental review.

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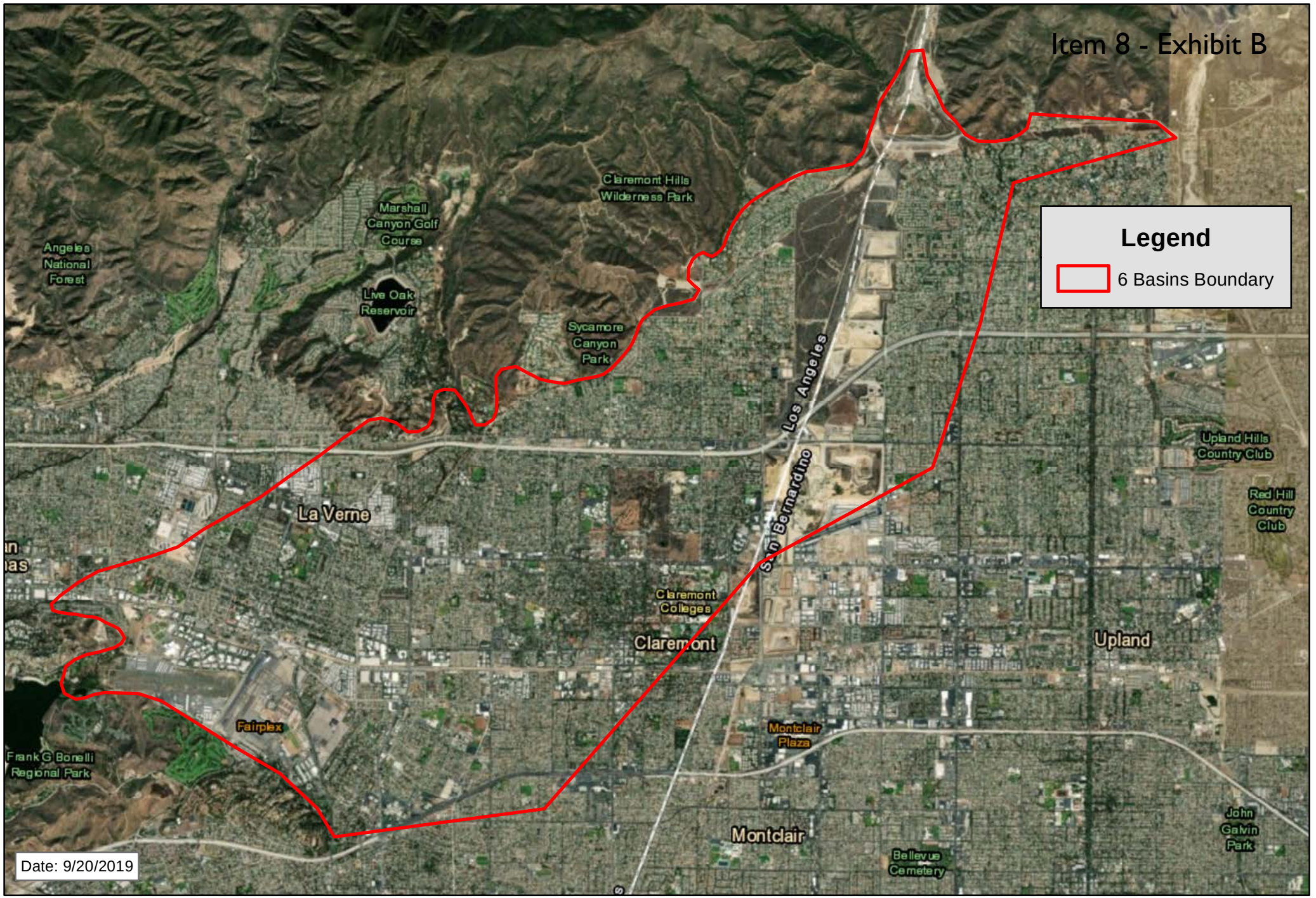

0 0.5 1 2 3 4 Miles

Imagery Date: 8/6/2017

Service Layer Credits: Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community

JERICHO SYSTEMS INCORPORATED

1 inch = 5,280 feet

Figure 3-4 Adjudicated Boundary	6 Basins Strategic Plan - Project EIR

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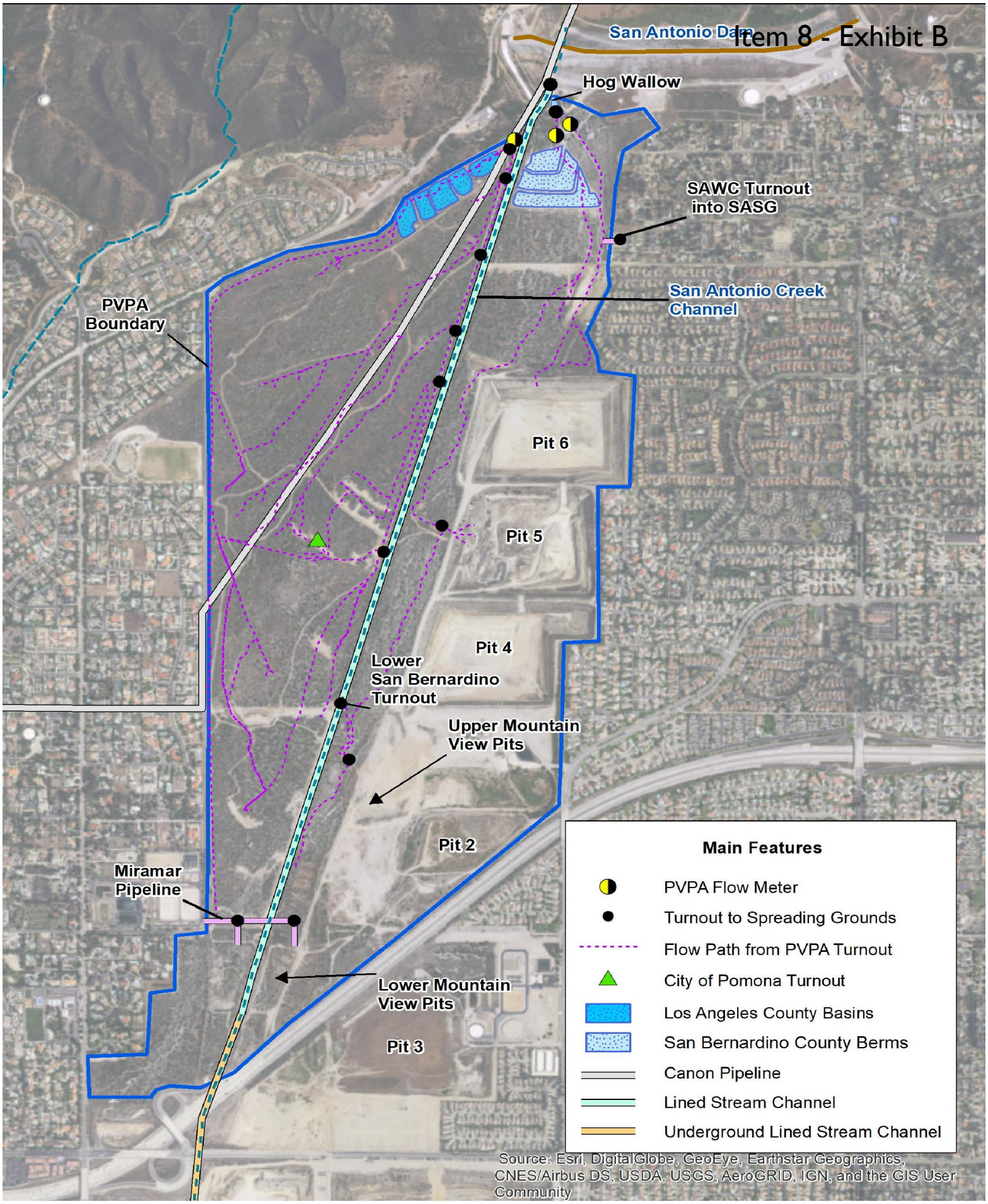

Source: WEI Figure 2-5c

JERICHO SYSTEMS INCORPORATED

Figure 2-8 San Antonio Spreading Grounds	6 Basins Strategic Plan - Program EIR

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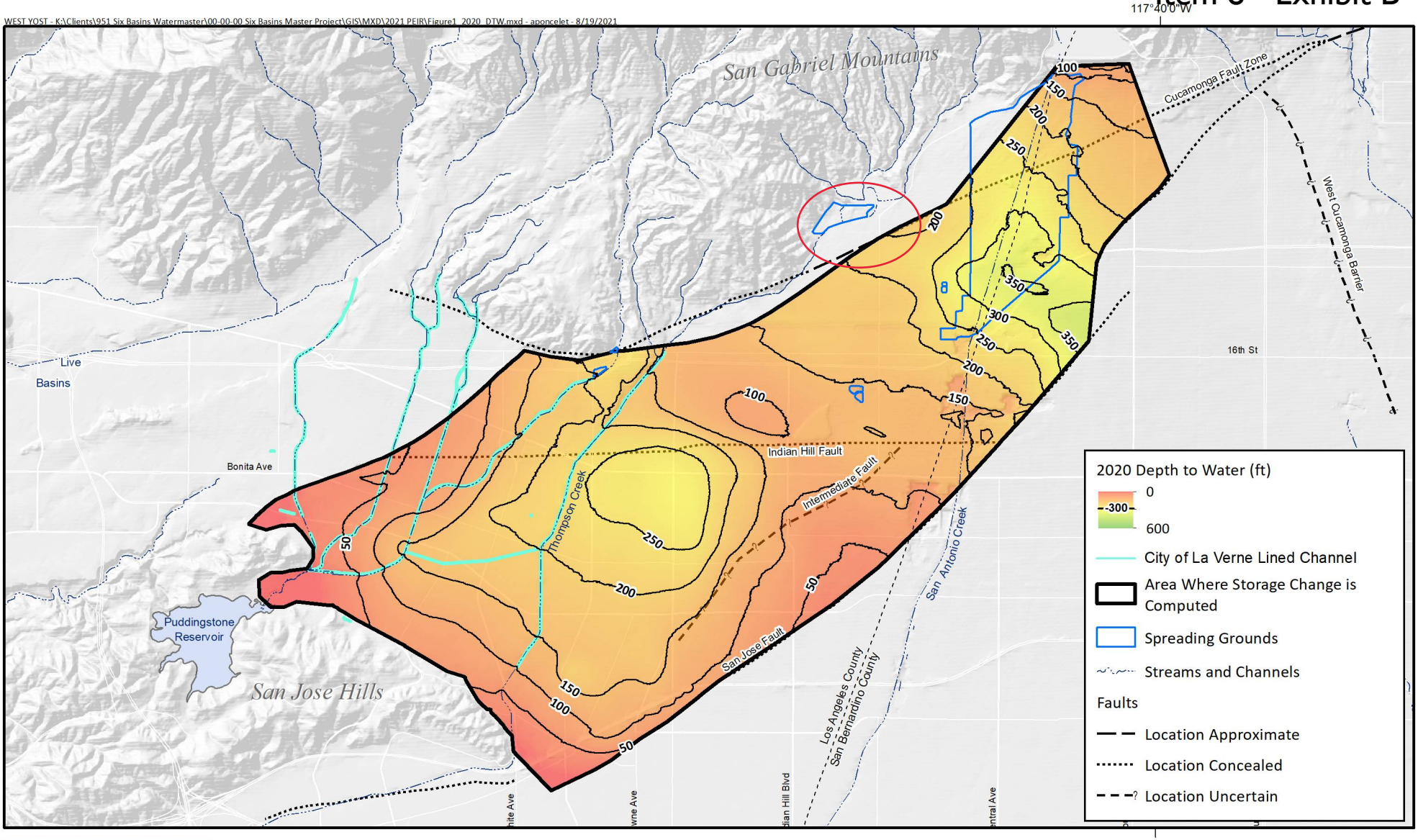

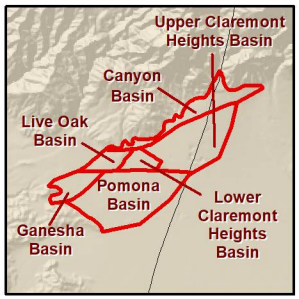

N

0 3,000 6,000

Scale in Feet

Figure 1

Depth to Groundwater in the Six Basins Fall 2020

Six Basins Watermaster

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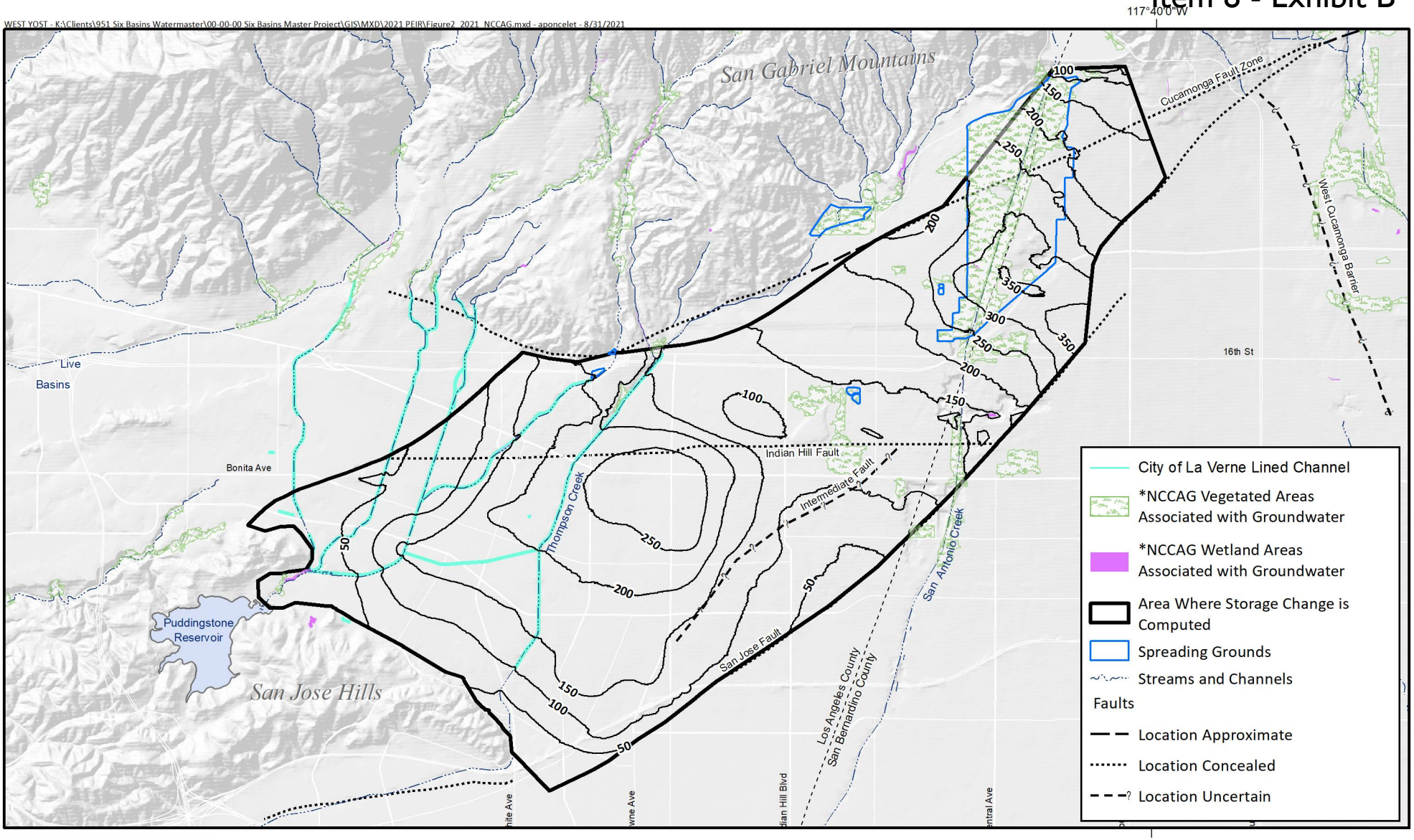

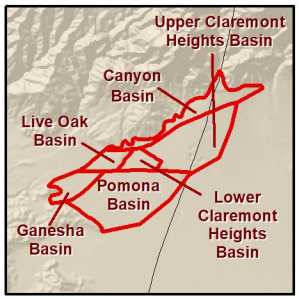

*Source: California Department of Water Resources - NCCAG Dataset
https://gis.water.ca.gov/app/NCDatasetViewer/#

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Scale in Feet

Figure 2

Natural Communities Commonly Associated with Groundwater in the Six Basins

Six Basins Watermaster

WEST YOST

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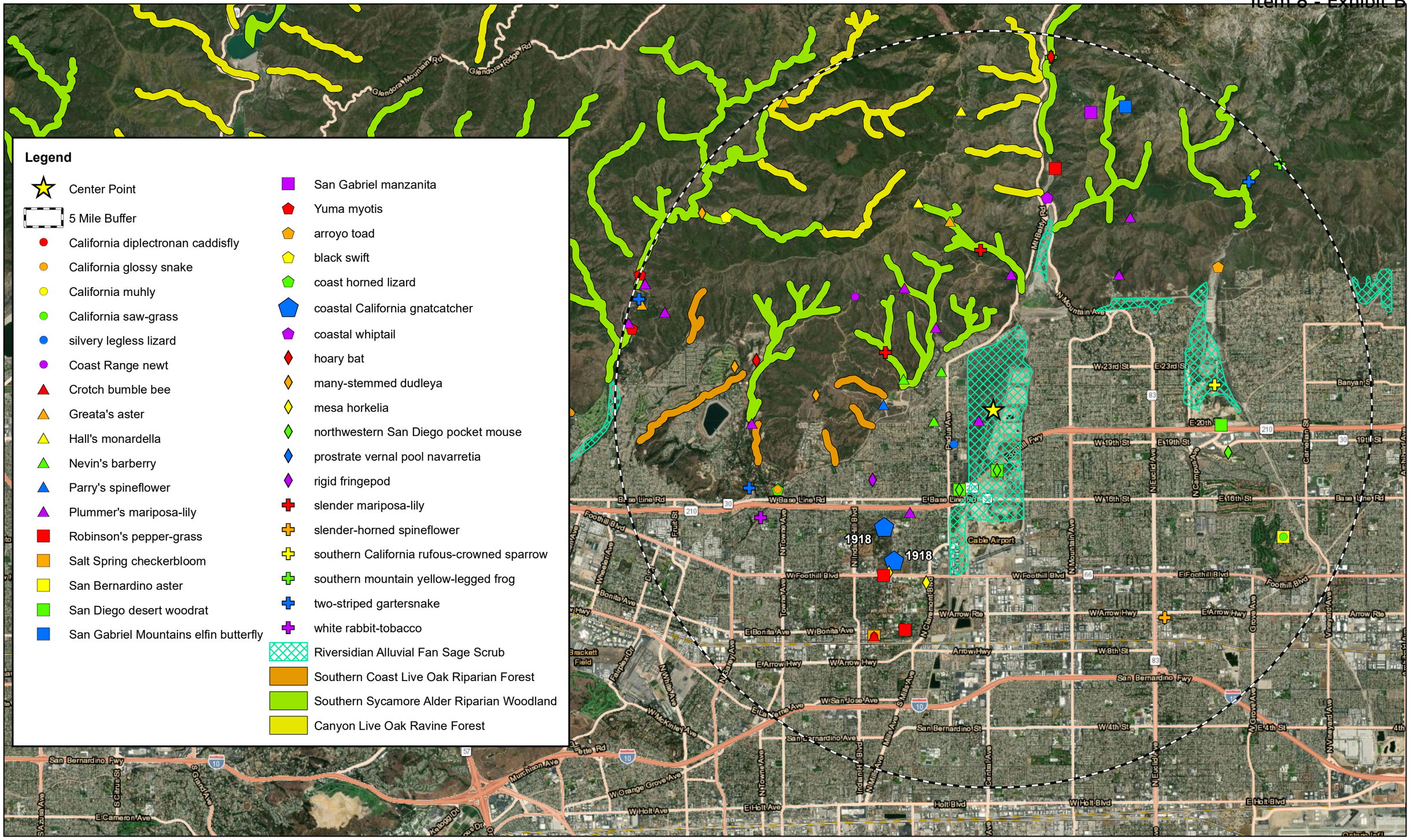

0 1.25 2.5 5 Miles

Source: ESRI Aerial Imagery, San Bernardino County

SIX BASINS

CNDDB Observations

Figure 3

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Letter 2

July 2, 2021

Three Valleys Municipal Water District
1021 Miramar Avenue
ATTN: Ben Peralta, P.E. Project Manager
Claremont, CA 91711
bperalta@tvmwd.com

West Yost
23692 Birtcher Drive
Carolina Sanchez, P.E. Senior Engineer
Lake Forest, CA 92630
csanchez@westyost.com

RE: Draft PEIR for Six Basins Strategic Plan

Dear Mr Peralta and Ms Sanchez:

Endangered Habitats League (EHL) appreciates the opportunity to comment on this project's CEQA documentation. For your reference, EHL is a Southern California regional conservation group, with a focus on remaining alluvial fan habitat and the rare species therein.

Biological impacts are not disclosed.

The project proposes new water recharge basins in San Antonio Creek and Thompson Creek of 50 acres and 25 acres, respectively. In both bases, the habitat involved is characterized as mature Riversidian alluvial fan sage scrub (RAFSS). Based on suitable habitat and scanty surveys, the PEIR acknowledges that rare and sensitive plants are likely to be impacted.

Impacts to the endangered San Bernardino kangaroo rat are discounted due to maturity of the vegetation and location. However, it is well-established that SBKR persist in mature RAFSS, albeit at lower densities, as more upland locations are integral to its life history and survival. (See enclosure.) Yet, surveys were not conducted. In regard to the SBKR, the best available scientific information about occupancy of mature RAFSS has been ignored.

2-1

More generally, the document's contention that, "The area is no longer subject to flood events needed to support open intermediate RAFSS habitat needed by most plant and wildlife species associated with RAFSS habitat," is vague and *unsupported by any*

2-2

substantial evidence that would justify the failure to conduct surveys for SBKR and other rare species.

Under CEQA, impacts are *required* to be disclosed at the *earliest point in time*. Program EIRs are no exception. Project design changes, alternatives, and mitigation are all most feasible at the earliest point in time. The DPEIR is defective in its failure to perform full surveys for all sensitive plant and animal species. We specifically recommend consultation with US Fish and Wildlife Service and California Dept. of Fish and Wildlife as to SBKR surveys. We note that the SBKR is currently a candidate species under CESA and subject to state regulation. 2-2 Con't

Mitigation for biological resource is deferred.

BIO-3 reads:

> BIO-3 Additional Biological Resources Assessments. Prior to the approval of future project on sites not identified in this EIR and occurring within an undeveloped area, a biological assessment shall be made of the selected or potential sites to determine if sensitive biological resources (sensitive plant community, sensitive species, jurisdiction waters) are present. If a sensitive biological resource is present, an analysis shall be made of the potential for impact to the resource, an appropriate mitigation strategy will be developed and submitted to the wildlife and regulatory agencies with authority to review and approve the mitigation strategy as reducing impacts to less than significant. Either appropriate avoidance and minimization measures will be developed to offset any potential impact or offsite mitigation will be provided to offset the impact. 2-3

This protocol constitutes "deferred mitigation," which is illegal under CEQA. At a minimum, clear and explicit *performance standards* must be formulated *at this time*. This case is particularly egregious in that unless a species *listed* under the state and federal Endangered Species Acts is subsequently found, *no regulatory authority* will be exerted by these agencies, and *no mitigation whatsoever* may in actuality be required by the lead agency.

RAFSS is one of the most depleted are rarest habitats in California. Mitigation for unavoidable impacts to RAFSS should be carried out at a 5:1 ratio, ideally in a CDFW-approved mitigation bank.

We look forward to responses to comments that correct the identified problems and to a PDEIR does justice to the plants and animals that still survive in these rare natural communities. 2-4

Please retain EHL on all mailing and distribution lists for this project, including CEQA documents and public hearings. Thank you for your consideration. 2-5

Yours truly,

Dan Silver
Executive Director

Enclosure

8 January 2021.LETTER RE SBKR HABITAT USE.revised#2_small.pdf

28 January 2021

Dan Silver
Endangered Habitats League
8424 Santa Monica Blvd., Suite A 592
Los Angeles, CA 90069-4267

Dear Mr. Silver:

I am writing this brief letter to offer my viewpoints on the issue of what types of habitats can and are occupied by San Bernardino kangaroo rats in the Lytle Creek and Cajon Creek alluvial ecosystems. I have studied the habitats and habits of this species in these areas for 30 years and have logged many hundreds of hours conducting trapping surveys for this species in these areas. These field studies have educated me in the variability of habitat use exhibited by this species in natural occupied areas in both ecosystems.

It is well known that SBKR typically occur in higher numbers in more open alluvial habitat types with sandy soils. However, this is not the only habitat type occupied by this species. In two field studies I completed in 2010 and 2017, I confirmed individuals of this species in a variety of denser scrub habitat types in the Lytle/Cajon Creek ecosystems. The 2017 study in the Cajon Creek Habitat Management Area, owned by Vulcan Materials, reported captures of SBKR in numerous locations exhibiting denser scrub habitats. In that study such dense scrub vegetation was typically named Mature AFSS or in some cases Intermediate AFSS. In addition, some trapping occurred in restored (previously disturbed and revegetated) scrub stands that exhibited very dense shrub cover and captures of SBKR. And these captures occurred during relatively brief 3-night trapping periods, while 5-night protocols are the standard to determine presence/absence of this species by the U.S. Fish and Wildlife Service. The same is true for the 2009-2010 study conducted for the East Branch Extension Project near Redlands, where numerous SBKR were captured in denser scrub stands in terrain far above and southward of the Santa Ana River floodplain. Photographs of habitat conditions in denser scrub stands with confirmed SBKR in the two study areas mentioned above are included at the bottom of this document. In addition, a series of figures from the 2017 study report are included below and show the locations of SBKR captures in the different areas with denser shrub cover at locations high above the main floodplain in the study area.

Although the numbers of SBKR typically are not high in such dense scrub habitats, the species does occur in such “unexpected” locations much of the time. It can be expected that most (all?) vertebrate animals exhibit some amount of plasticity of habitat preference, and this is the case with SBKR. Given the often intensive and broad flooding that periodically occurs in the alluvial systems of the Upper Santa Ana River and Lytle/Cajon Creek drainages, it would be maladaptive for SBKR to be entirely restricted to habitats in the lower elevational main flood zones of these floodplains. If they were solely restricted to the frequently flooded zones of these systems, their

populations would potentially be entirely eliminated during the larger floods that occasionally occur in these systems. Alternatively, the ability of certain individuals of this species to occupy higher benches out of the main flood zones would make considerable evolutionary sense for SBKR. Such "refugia" from the ravages meted by such intensive floods would obviously be critical to the long term survival of this species. That is, animals in the higher benches and higher habitat stands out of the reach of expansive catastrophic flooding would be able to recolonize the newly "refreshed" sandy habitats in lower elevational habitats where all SBKR were eliminated. Eliminating such higher elevation "refugia" may ultimately be the primary factor that leads to the demise of this species.

In addition, a longer-term perspective on habitat use by SBKR is important. The higher elevation benches and associated denser habitats at the edges of the main floodplains of Lytle/Cajon Creeks may harbor low numbers of SBKR at present. However, over the long term, these denser habitats may be altered by such factors as fire and drought, leading to their conversion to more open habitat conditions suitable for the species. SBKR survival over the long term will require an abundance of habitat areas, with corridors connecting separate "islands" of occupied habitat that allow their subpopulations to interbreed and maintain genetic diversity over time. The indiscriminate conversion of large patches of extant denser alluvial fan scrub habitat at different levels above the main flood zones in Lytle/Cajon Creeks, including areas of confirmed occupied habitat, will effectively nudge the species further toward extirpation in this ecosystem.

The existing habitat types in the proposed Neighborhoods 2 and 3 of the Lytle Development project exhibit habitats that are similar to some of the denser occupied habitats in the 2017 trapping study area on Vulcan lands, which are located directly east of the Neighborhood 2. Furthermore, a 2017 trapping survey conducted by San Diego Zoo biologists in the area immediately adjacent to Neighborhood 2 (see SD Zoo figure at the end of this document) captured numerous SBKR in habitats that appear quite similar to those in Neighborhood 2. Given this simple fact, it does not make logical sense that Neighborhood 2 does not harbor good numbers of SBKR in certain areas; that is, in habitat types beyond the classic more open alluvial habitats assumed by previous project biologists to be the only ones that harbor SBKR. And the same logic would apply to Neighborhood 3.

Given the fact that this species does, as reported above, occur in denser scrub habitat types, it is highly likely that extended trapping in areas of denser vegetation in Neighborhoods 2 and 3 (likely including some higher elevation locations) – much of which has been considered to be unsuitable for SBKR by other biologists associated with the project – would confirm presence of individuals of this species in noteworthy locations. In summary, it is highly likely that substantial numbers of SBKR, **and a sizable clearly important population of the species**, will be decimated by numerous portions of the proposed Neighborhood 2 and 3 developments.

Please let me now if you have any questions regarding the information presented above.

Sincerely,

Stephen J. Montgomery

Wildlife Biologist, Permitted SBKR Biologist
Former owner of SJM Biological Consultants, Inc.
2128 N. Cobblestone Circle
Flagstaff, AZ 86001
858 232 9602

PHOTOGRAPHS OF DENSER SCRUB HABITATS WITH CONFIRMED CAPTURES OF SBKR IN THE LYTLE/CAJON CREEK ECOSYSTEM

Item 8 - Exhibit B


PLOT 16

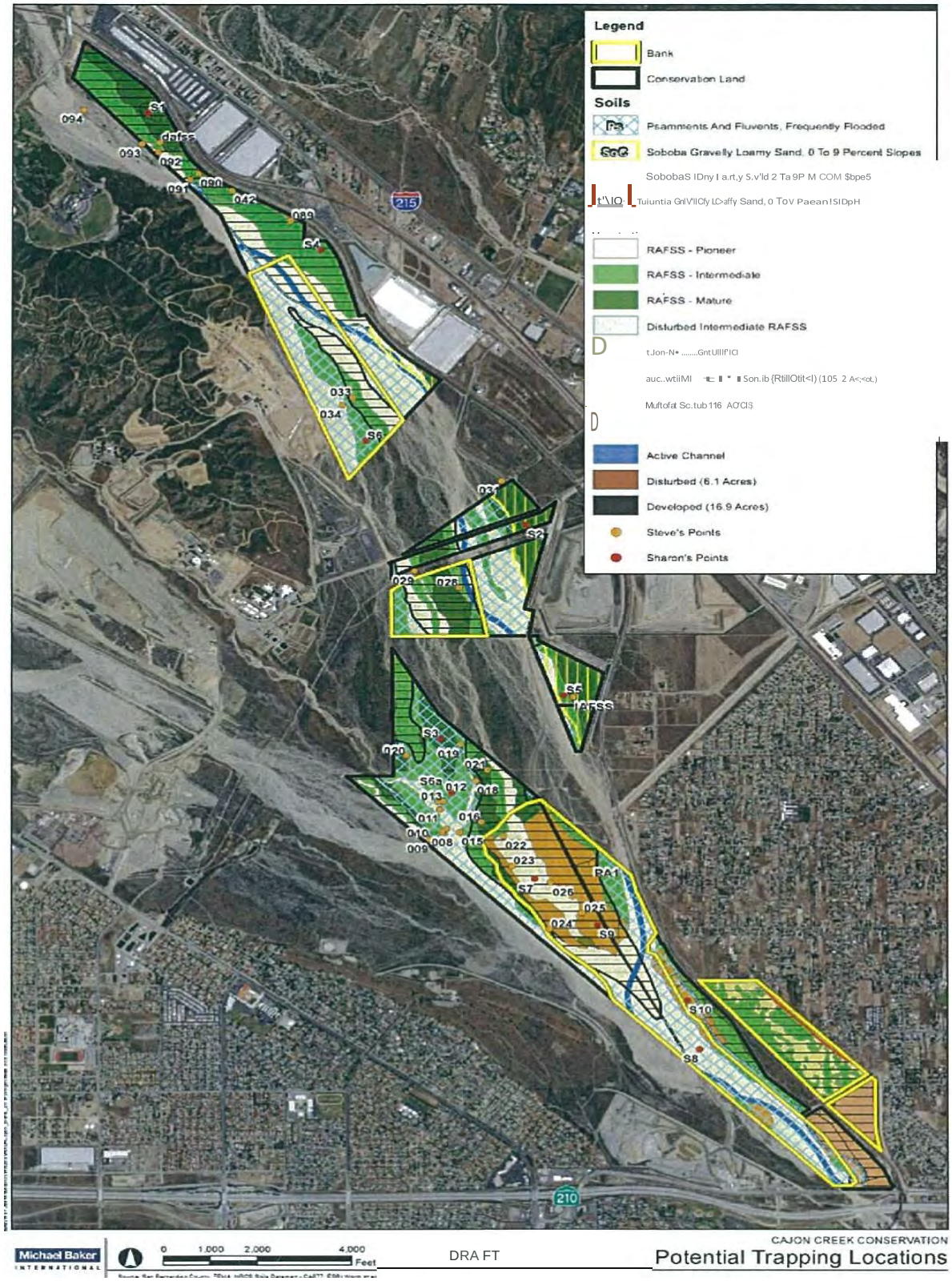
*** Restored (previously disturbed and revegetated) sage scrub habitat with multiple SBKR captures**


Plot
11-5-2017

PHOTOGRAPHS OF DENSER STANDS OF AFSS HABITAT WITH NUMEROUS SBKR CAPTURES – 2009-2010

In the area east of Opal Avenue, Santa Ana River ecosystem – East Branch Extension Project Mitigation Area

FIGURES FROM 2017 SBKR SURVEY REPORT

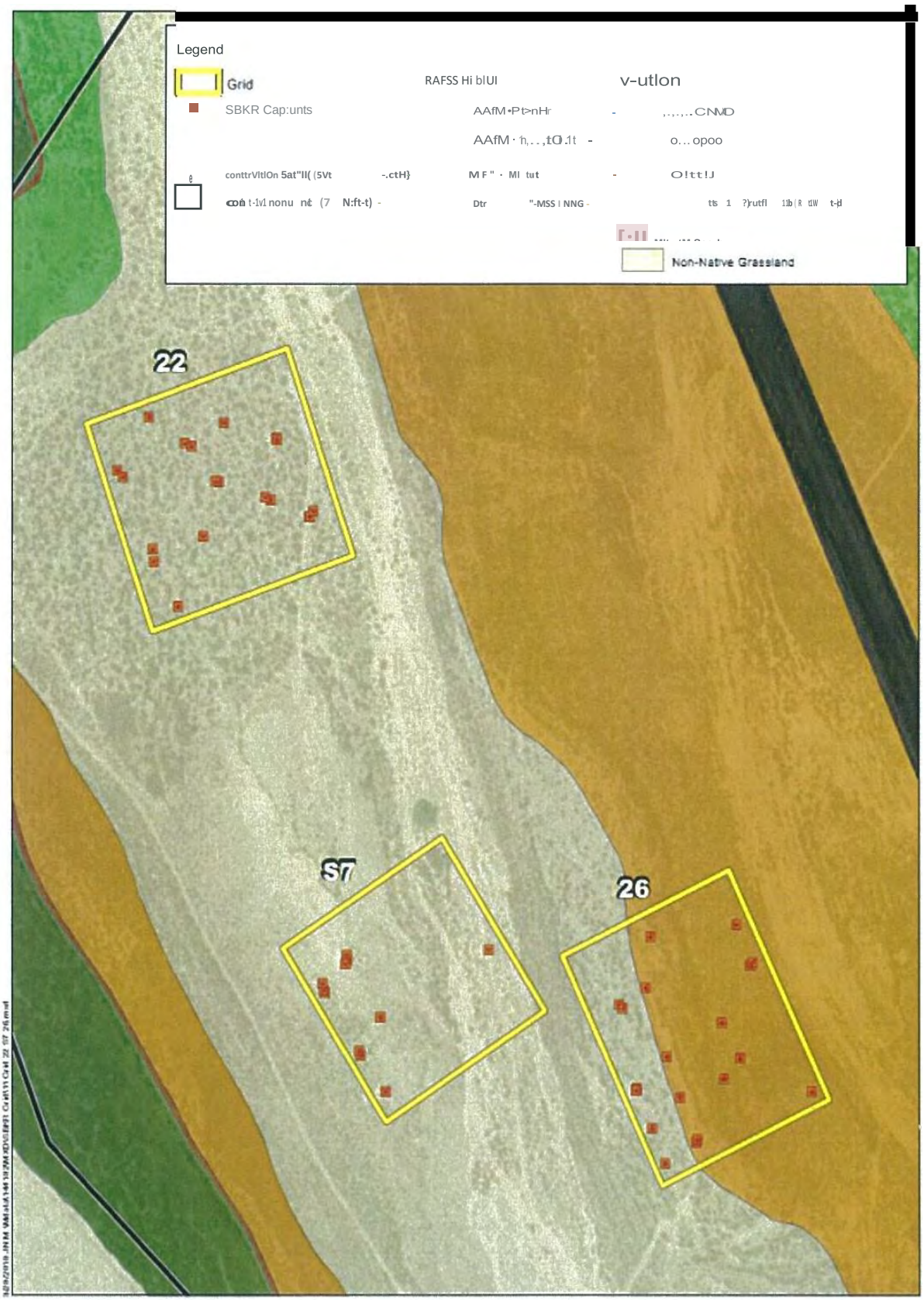


Legends in the following figures are damaged. SBKR captures are shown as red dots and DKR captures are shown as purple dots. Green vegetation types are shown in previous figure above, and orange areas are restored (previously disturbed/mined) habitats with varying amounts of shrub cover


Legend
SBKR Cap1Ins
DKR Cal)llJrH
RAFSS HJbllat
Veijelatlon
Non-Native Grassland
21
18
12
13
16
Michael Baker
INTERNATIONAL
0
100
200
400
Feet
CAJON CREEK CONSERVATION
Grids 21, 18, 12, 13 and16

Exhibit 9

Item 8 - Exhibit B




Legend
Grid
RA1
26
Michael Baker
INTERNATIONAL
0
100
200
400
Feet
CAJON CREEK CONSERVATION
Grids 26 and RA1

SD ZOO TRAPPING AREA

Letter 2 Endangered Habitats League

Comment 2-1 Impacts to the endangered San Bernardino kangaroo rat are discounted due to maturity of the vegetation and location. However, it is well-established that SBKR persist in mature RAFSS, albeit at lower densities, as more upland locations are integral to its life history and survival. (See enclosure.) Yet, surveys were not conducted. In regard to the SBKR, the best available scientific information about occupancy of mature RAFSS has been ignored.

Response 2-1 The Program EIR was prepared as a programmatic document in support of the Strategic Plan for the Six Basins. CEQA Guidelines Section 16168(c) describes how a Program EIR may be used with activities such as those outlined in the Strategic Plan being proposed by the Watermaster Parties. These activities, including new recharge basins in the SASG and TCSG project areas are considered subsequent or later activities under CEQA.

Because the environmental evaluation of the Strategic Plan was undertaken at a programmatic level, the biological field surveys were conducted in the general area where the future recharge basins in the SASG and TCSG would be located. During those surveys a general assessment of habitat quality was made and conclusions reached regarding the potential for special status species to occur. The conclusion of the project biologist was that there is no suitable habitat for SBKR and that the occurrence potential is low. SBKR has not been trapped in this area of the San Gabriel Mountains in several decades. Final EIR Figure 3 (see Response to 1-5) shows CNDDB observations within a 5-mile radius of the center of the SASG. There were no observations recorded for SBKR within that area, including the TCSG and SASG project areas.

Adoption of the Six Basins Strategi Plan and certification of the Final Program EIR for the Plan does not mean that individual projects are approved, and construction is imminent. After certification of the Program EIR by the lead agency, each Watermaster Party proposing a subsequent, related project (either identified in the Strategic Plan or a future project not currently known), including the PVPA's SASG and TCSG projects, is responsible for ensuring CEQA compliance, and compliance with all other responsible or trustee agency requirements.

Therefore, once the design of a project including identifying the footprint of the facility and area of disturbance but prior to commencement of construction activities, the Watermaster Party proposing the project will be completing a number of site studies including a site-specific Biological Resource Assessment; and a subsequent environmental assessment in the form of an Initial Study. The Initial Study would be based on a review of the proposed project as evaluated in the Program EIR, as well as the results of any new studies prepared for a project, and based on the whole record, a determination would be made whether a Mitigated Negative Declaration or a Subsequent EIR should be prepared.

As stated in mitigation measure BIO-3, "If a sensitive biological resource is present, an analysis will be made of the potential for impact to the resource, an appropriate mitigation

strategy will be developed and submitted to the wildlife and regulatory agencies with authority to review and approve the mitigation strategy as reducing impacts to less than significant. Either appropriate avoidance and minimization measures will be developed to offset any potential impact or offsite mitigation shall be provided to offset the impact." This is in line with California Department of Fish and Wildlife policies.

Comment 2-2 The document's contention that, "The area is no longer subject to flood events needed to support open intermediate RAFSS habitat needed by most plant and wildlife species associated with RAFSS habitat," is vague and *unsupported by any substantial evidence* that would justify the failure to conduct surveys for SBKR and other rare species. More generally, the document's contention that, "The area is no longer subject to flood events needed to support open intermediate RAFSS habitat needed by most plant and wildlife species associated with RAFSS habitat," is vague and *unsupported by any substantial evidence* that would justify the failure to conduct surveys for SBKR and other rare species.

Response 2-2 See response to comment 2-1 regarding the purpose of a program EIR and supporting documentation, including a Biological Resources Assessment. A program level focused surveys for specific species is not appropriate because: (1) the specific location of recharge basins is not known at this time; (2) neither the SASG or TCSG project has been designed so the area of disturbance/buffer area is not known; and (3) the schedule for construction is unknown. Specifically, for the SASG the area that was the subject of the Biological Resources Assessment is approximately 195 acres in which a 50-acre recharge basin could be developed. Therefore, conducting focused surveys for specific species at this time would be premature. Therefore, mitigation measure BIO-3 was identified to ensure that at such time as a project is ripe for development all studies including subsequent biological resources assessments would be conducted.

Comment 2-3 Under CEQA, impacts are *required* to be disclosed at the *earliest point in time*. Program EIRs are no exception. Project design changes, alternatives, and mitigation are all most feasible at the earliest point in time. The DPEIR is defective in its failure to perform full surveys for all sensitive plant and animal species. We specifically recommend consultation with USFWS and CDFW as to SBKR surveys. We note that the SBKR is currently a candidate species under CESA and subject to state regulation.

Response 2-3 Please see response to comment 2-1.

Comment 2-4 This protocol outlined in mitigation measure BIO-3 constitutes "deferred mitigation," which is illegal under CEQA. At a minimum, clear and explicit *performance standards* must be formulated *at this time*. This case is particularly egregious in that unless a species *listed* under the state and federal Endangered Species Acts is subsequently found, *no regulatory authority* will be exerted by these agencies, and *no mitigation whatsoever* may in actuality be required by the lead agency.

Response 2-4 In response to comments received from CDFW, mitigation measure BIO-3 has been revised as follows:

BIO-3 *Additional Biological Resources Assessments*. Prior to the approval of future projects on sites not identified in this EIR and occurring within an undeveloped area, or sites within the SASG or TCSG where new recharge basins and related infrastructure are proposed, a biological assessment shall be made of the selected or potential sites to determine if sensitive biological resources (sensitive plant community, sensitive species, jurisdiction waters) are present. If a sensitive biological resource is present, an analysis will be made of the potential for impact to the resource, an appropriate mitigation strategy will be developed and submitted to the wildlife and regulatory agencies with authority to review and approve the mitigation strategy as reducing impacts to less than significant. Either appropriate avoidance ~~and~~ or minimization measures will be developed to offset any potential impact or offsite mitigation shall be provided to offset the impact. At a minimum, the mitigation strategy shall (1) identify the affected SSC; (2) identify strategies for handling and relocation of individuals per CDFW guidance, and (3) identify compensatory mitigation for temporary or permanent loss of habitat that supports SSC (ratio to be determined in consultation with CDFW through an Incidental Take Permit.

As discussed in response to comment 2-1, adoption of the Six Basins Strategic Plan and certification of the Final Program EIR for the Plan does not mean that individual projects are approved, and construction is imminent. After certification of the Program EIR by the lead agency, each Watermaster Party proposing a subsequent, related project (either identified in the Strategic Plan or a future project not currently known), including the PVPA's SASG and TCSG projects, is responsible for ensuring CEQA compliance, and compliance with all other responsible or trustee agency requirements.

Therefore, once the design of a project including identifying the footprint of the facility and area of disturbance but prior to commencement of construction activities, the Watermaster Party proposing the project will be completing a number of site studies including a site-specific Biological Resource Assessment; and a subsequent environmental assessment in the form of an Initial Study. The Initial Study would be based on a review of the proposed project as evaluated in the Program EIR, as well as the results of any new studies prepared for a project, and based on the whole record, a determination would be made whether a Mitigated Negative Declaration or a Subsequent EIR should be prepared.

Comment 2-5 We look forward to responses to comments that correct the identified problems and to a PDEIR does justice to the plants and animals that still survive in these rare natural communities. Please retain EHL on all mailing and distribution lists for this project, including CEQA documents and public hearings. Thank you for your consideration.

Response 2-5 The Endangered Habitats League is on the mailing list to receive the notice of TVMWD's public hearing on the Six Basins Strategic Plan and Program EIR. The notice will include a link where you may review the Final EIR.

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3.0 Errata

The following are revisions to the Draft Program Environmental Impact Report (DPEIR) for the Six Basins Strategic Plan. These revisions are minor modifications and clarifications to the document, and do not change the significance of any of the environmental issue conclusions within the DPEIR. The revisions are listed by page number. All additions to the text are underlined and all deletions from the text are ~~stricken~~.

3.1 Revisions to the DPEIR in Response to Specific Comments

Chapter ES Executive Summary

Chapter ES, Table ES-5, *Six Basins Program EIR Summary of Impacts and Mitigation Measures,* has been revised to reflect comments received from the California Department of Fish and Wildlife starting on page ES-23.

Impacts	Level of Significance After Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 4.4-1 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.			
Pump and Treat Water Recharge Temporary Surplus	Potentially Significant	BIO-1a *Tree Removal*. Prior to the trimming or removal of a tree at any project site, a project proponent will coordinate with the local agency to determine if the particular trees targeted for trimming or removal are heritage trees regulated by local agency. If the targeted tree is a heritage under the City or County Regulations, the appropriated application will be submitted and approved by the local agency prior to conducting the trimming or removal of the heritage tree(s), except where compliance is not required by California law. BIO-1b Prior to commencement of ground disturbing activities where native trees may require trimming or removal), and to address the potential spread of invasive pests and diseases by implementing the following: 1) Prior to tree trimming or removal, a certified arborist shall evaluate trees for infectious tree diseases including but not limited to: sudden oak death (*Phytophthora ramorum*), thousand canker fungus (*Geosmithia morbida*), polyphagous shot hole borer (*Euwallacea* spp.), and goldspotted oak borer (*Agrilus auroguttatus*) (TCD 2021; UCANR 2021; Phytosphere Research 2012; UCIPM 2013). 2) If a certified arborist determines trees are impacted by infectious pests or diseases, the certified arborist shall prepare an *Infectious Tree Disease Management Plan* or develop a detailed, robust, enforceable, and feasible list of preventative measures. A plan/list shall provide measures relevant for each tree pest or disease observed. To avoid the spread of infectious tree pests and diseases, infected trees should not be transported from a project area without first being treated using best available management practices	Less than significant

Impacts	Level of Significance After Mitigation	Mitigation Measures	Level of Significance After Mitigation
		described in the *Infectious Tree Disease Management Plan* or list of preventative measures. 3) If possible, all tree material, especially infected tree material, shall be left on site. The material could be chipped for use as ground cover or mulch. Pruning and power tools should be cleaned and disinfected before use to prevent introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas. BIO-3 *Additional Biological Resources Assessments*. Prior to the approval of future projects on sites not identified in this EIR and occurring within an undeveloped area, or sites within the SASG or TCSG where new recharge basins and related infrastructure are proposed, a biological assessment shall be made of the selected or potential sites to determine if sensitive biological resources (sensitive plant community, sensitive species, jurisdiction waters) are present. If a sensitive biological resource is present, an analysis will be made of the potential for impact to the resource, an appropriate mitigation strategy will be developed and submitted to the wildlife and regulatory agencies with authority to review and approve the mitigation strategy as reducing impacts to less than significant. Either appropriate avoidance ~~and~~ or minimization measures will be developed to offset any potential impact or offsite mitigation shall be provided to offset the impact. Where a species is State-listed, CDFW would require full mitigation under an Incidental Take Permit. At a minimum, the mitigation strategy shall (1) identify the affected SSC; (2) identify strategies for handling and relocation of individuals per CDFW guidance, and (3) identify compensatory mitigation for temporary or permanent loss of habitat that supports SSC (ratio to be determined in consultation with CDFW) and/or through acquisition of an Incidental Take Permit if a state listed or candidate species is determined to be present.	
4.4-2 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.			
Pump and Treat Water Recharge Temporary Surplus	Potentially Significant	BIO-4 *Wetland Permits or Streambed Alteration Agreement*. Prior to approval of a project where permanent impacts in areas determined to be potential jurisdictional wetlands or riparian features, Waters of the State or Waters of the U.S., the Watermaster Party undertaking a project shall consult with the regulatory agencies (USACE, RWQCB and CDFW) to determine if a CWA 404 permit, CWA 401 or a Streambed Alternation Agreement under Fish and Game Code 1602 are required prior to development. Based on a notification pursuant to Fish and Game Code section 1602 and other information, CDFW will determine whether a Lake and Streambed Alteration (LSA) Agreement is required prior to conducting proposed activities. An LSA Notification shall include the following: 1) an analysis to demonstrate that concrete-lined or soft-bottom channels would not be impaired (e.g., aggraded, incised, increased suspended sediment), 2) a hydrological evaluation of the 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions, 3) whether dewatering/diversion of water may be	

Impacts	Level of Significance After Mitigation	Mitigation Measures	Level of Significance After Mitigation
		necessary, and (if applicable) 4), an analysis of whether diversion structures would impact stormwater and dry season water flow, and the extent of those impacts, during the wet season (November through March), dry season (April through October), and both above-average and below-average water year. The following shall be incorporated into the permitting subject to approval by the regulatory agencies: a. On- or offsite replacement of USACE/RWQCB jurisdictional waters of the U.S./waters of the State at a ratio no less than 1:1 for permanent impacts and to restore the site to pre-project conditions for temporary impacts. Offsite replacement may include the purchase of mitigation credits at an agency-approved offsite mitigation bank or in-lieu fee program. b. On- or offsite replacement of CDFW jurisdictional streambed and associated riparian habitat at a ratio no less than 2:1 for permanent impacts and to restore the site to pre-project conditions for temporary impacts. Offsite replacement may include the purchase of mitigation credits at an agency-approved offsite mitigation bank or in-lieu fee program.	

Section 4.4 Biological Resources

Page 4-158, first paragraph under *Pedley Spreading Grounds*. Revisions to the text are as follows:

A general assessment of jurisdictional waters was not completed for the Pedley Spreading Grounds (PSG) site, nor was a field survey completed at the site. The PSG site consists of small basins that are fed by a pipeline that conveys water from below the San Antonio Dam through the pipeline and into the basins located in a residential neighborhood in the City of Claremont. There are no natural drainage features that provide water to the PSG and there is no outlet from the PSG site into any drainage feature such as a creek or flood control channel. Expansion of the PSG consists of widening and deepening the existing basins and providing additional water from the local storm drain system through a new pipeline. No outlet from the PSG site is envisioned for this project, therefore, there is no impact on jurisdictional waters or wetlands associated with the PSG project at the project site.

However, the diversion of stormwater from the existing storm drain system to the PSG could negatively affect downstream habitat that is dependent on that stormwater. Therefore, during the planning/design phase of the PSG site, the Watermaster Party proposing this project shall implement mitigation measure BIO-3 which requires the preparation of a biological resources assessment to determine if sensitive biological resources (sensitive plant community, sensitive species, jurisdiction waters) are present. In addition, if the assessment determines that the project would impact a jurisdictional water

(Waters of the State or US), then implementation of mitigation measure BIO-4 to consult with regulatory agencies is also required.

Page 4-159, the last paragraph under Fairplex Recharge Facilities, has been revised as follows:

Although the Thompson Creek channel in the vicinity of the LA Fairplex is concrete lined, it is tributary to the San Gabriel River and at the confluence between the creek and the river, the river is unlined and exhibits riparian features. Therefore, mitigation measure BIO-3 has been identified to requires the Watermaster Party proposing this project shall prepare a biological resources assessment that addresses the diversion of stormwater from the existing storm drain system to the underground infiltration gallery that could negatively affect downstream habitat that is dependent on that stormwater. Therefore, during the planning/design phase of the Fairplex site, the Watermaster Party proposing this project shall prepare a biological resources assessment to determine if sensitive biological resources (sensitive plant community, sensitive species, jurisdiction waters) are present.

Section 4.4-5, Mitigation Measures, pages 4-166 through 4-168. Mitigation Measures have been revised to reflect CDFW comments as follows:

BIO-1a *Tree Removal*. Prior to the trimming or removal of a tree at any project site, a project proponent will coordinate with the local agency to determine if the particular trees targeted for trimming or removal are heritage trees regulated by local agency. If the targeted tree is a heritage under the City or County Regulations, the appropriated application will be submitted and approved by the local agency prior to conducting the trimming or removal of the heritage tree(s), except where compliance is not required by California law.

BIO-1b Prior to commencement of ground disturbing activities where native trees may require trimming or removal), and to address the potential spread of invasive pests and diseases by implementing the following:

1) Prior to tree trimming or removal, a certified arborist shall evaluate trees for infectious tree diseases including but not limited to: sudden oak death (*Phytophthora ramorum*), thousand canker fungus (*Geosmithia morbida*), polyphagous shot hole borer (*Euwallacea* spp.), and goldspotted oak borer (*Agrilus auroguttatus*) (TCD 2021; UCANR 2021; Phytosphere Research 2012; UCIPM 2013).
2) If a certified arborist determines trees are impacted by infectious pests or diseases, the certified arborist shall prepare an *Infectious Tree Disease Management Plan* or develop a detailed, robust, enforceable, and feasible list of preventative measures. A plan/list shall provide measures relevant for each tree pest or disease observed. To avoid the spread of infectious tree pests and diseases, infected trees should not be transported from a project area without first being treated using best available management practices described in the *Infectious Tree Disease Management Plan* or list of preventative measures.

3) If possible, all tree material, especially infected tree material, shall be left on site. The material could be chipped for use as ground cover or mulch. Pruning and power tools should be cleaned and disinfected before use to prevent introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas.

BIO-2 *Nesting Birds*. Removal of any trees, shrubs, or any other potential nesting habitat shall be conducted outside the avian nesting season, as verified by a qualified Avian Biologist. The nesting season generally extends from February 1 through August 31, but it can vary slightly from year to year based on seasonal weather conditions. If ground disturbance and vegetation removal cannot occur outside of the qualified Avian Biologist's-verified nesting season, a preconstruction clearance survey for nesting birds shall be conducted within 30 days of the start of any construction. If no active nests are found, no further action would be required. If an active nest is found, the biologist shall set appropriate no-work buffers around the nest, which would be determined based on the nesting species, its sensitivity to disturbance, nesting stage and expected types, intensity and duration of disturbance. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved no-work buffer zone shall be clearly marked in the field, within which no disturbance activity shall commence until the qualified biologist has determined the young birds have successfully fledged and the nest is inactive.

BIO-3 *Additional Biological Resources Assessments*. Prior to the approval of future projects on sites not identified in this EIR and occurring within an undeveloped area, or sites within the SASG or TCSG where new recharge basins and related infrastructure are proposed, a biological assessment shall be made of the selected or potential sites to determine if sensitive biological resources (sensitive plant community, sensitive species, jurisdiction waters) are present. If a sensitive biological resource is present, an analysis will be made of the potential for impact to the resource, an appropriate mitigation strategy will be developed and submitted to the wildlife and regulatory agencies with authority to review and approve the mitigation strategy as reducing impacts to less than significant. Either appropriate avoidance ~~and~~ or minimization measures will be developed to offset any potential impact or offsite mitigation shall be provided to offset the impact. Where a species is State-listed, CDFW would require full mitigation under an Incidental Take Permit. At a minimum, the mitigation strategy shall (1) identify the affected SSC; (2) identify strategies for handling and relocation of individuals per CDFW guidance, and (3) identify compensatory mitigation for temporary or permanent loss of habitat that supports SSC (ratio to be determined in consultation with CDFW) and/or through acquisition of an Incidental Take Permit if a state listed or candidate species is determined to be present.

BIO-4 *Wetland Permits or Streambed Alteration Agreement*. Prior to approval of a project where permanent impacts in areas determined to be potential jurisdictional wetlands or riparian features, Waters of the State or Waters of the U.S., the

Watermaster Party undertaking a project shall consult with the regulatory agencies (USACE, RWQCB and CDFW) to determine if a CWA 404 permit, CWA 401 or a Streambed Alternation Agreement under Fish and Game Code 1602 are required prior to development. Based on a notification pursuant to Fish and Game Code section 1602 and other information, CDFW will determine whether a Lake and Streambed Alteration (LSA) Agreement is required prior to conducting proposed activities. An LSA Notification shall include the following: 1) an analysis to demonstrate that concrete-lined or soft-bottom channels would not be impaired (e.g., aggraded, incised, increased suspended sediment), 2) a hydrological evaluation of the 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions, 3) whether dewatering/diversion of water may be necessary, and (if applicable) 4), an analysis of whether diversion structures would impact stormwater and dry season water flow, and the extent of those impacts, during the wet season (November through March), dry season (April through October), and both above-average and below-average water year.

The following shall be incorporated into the permitting subject to approval by the regulatory agencies:

a. On- or offsite replacement of USACE/RWQCB jurisdictional waters of the U.S./waters of the State at a ratio no less than 1:1 for permanent impacts and to restore the site to pre-project conditions for temporary impacts. Offsite replacement may include the purchase of mitigation credits at an agency-approved offsite mitigation bank or in-lieu fee program.
b. On- or offsite replacement of CDFW jurisdictional streambed and associated riparian habitat at a ratio no less than 2:1 for permanent impacts and to restore the site to pre-project conditions for temporary impacts. Offsite replacement may include the purchase of mitigation credits at an agency-approved offsite mitigation bank or in-lieu fee program.

3.2 Revisions to the DPEIR to Clarify Text

The following section is meant to clean up typographical errors, grammar, or to clarify text.

Chapter ES Executive Summary

The information contained in the column labeled Level of Significance Before Mitigation was incorrect for those issues and project categories where a potentially significant impact was identified, and mitigation measures are required. Therefore, a global correction has been made to Table ES-5 replacing the existing finding with the correct finding as follows:

Impacts	Level of Significance Before Mitigation
Pump and Treat Water Recharge Temporary Surplus	~~Less Than Significant with Mitigation Incorporated~~ Potentially Significant

MITIGATION MONITORING AND REPORTING PROGRAMS FOR THE SIX BASINS STRATEGIC PLAN

(State Clearinghouse No. 2018091020)

Prepared for:

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October 2021

MITIGATION MONITORING AND REPORTING PROGRAMS
FOR THE SIX BASINS STRATEGIC PLAN

Section 21081.6 of the California Environmental Quality Act (CEQA) and CEQA Guidelines Section 15097 require a Lead Agency to adopt a Mitigation Monitoring and Reporting Program (MMRP) whenever it certifies an Environmental Impact Report (EIR). The purpose of the MMRP is to ensure compliance with the mitigation measures occurs during project implementation.

The Program EIR prepared for the Six Basins Strategic Plan (Project) concluded that implementation of the Strategic Plan and related projects could result in potentially significant effects on the environment and mitigation measures were incorporated into the proposed Project or are required as a condition of project approval that reduce these potential impacts to a less than significant level.

The Draft Program EIR evaluated future projects in three categories: Project Category 1 – Pump and Treat; Project Category 2 – Stormwater and Supplemental Water Recharge; and Project Category 3 - Temporary Surplus. A fourth project category – Project Category 4 – Monitoring Programs in Support of the Strategic Plan, would not result in any physical changes to the environment, therefore this category of projects had no impacts.

MMRP document contains three separate MMRPs, one for each of the propjet categories where mitigation measures have been identified to reduce potentially significant impacts to less than significant levels. Each of the MMRPs documents how and when the mitigation measures adopted by the lead agency will be implemented and confirms that potential environmental impacts are reduced to less than significant levels as identified in the Program EIR.

The MMRP document does not discuss those subjects that the environmental analysis demonstrates would result in less than significant impacts and for which no mitigation was proposed or necessary.

Mitigation Measure	Implementation Schedule	Verification	Source
Aesthetics <u>Facilities and Landscaping</u> AES-1 Proposed facilities, including walls, gates, treatment facilities, etc., shall be designed in accordance with local design standards in order to be complementary to the local area. Landscaping shall be installed and maintained in conformance with local landscaping design guidelines as appropriate to screen views of new facilities from surrounding areas to the extent feasible taking into consideration the needs of the project and except where such compliance is not required by California law.	AES-1 shall be incorporated into individual project design specifications, which shall be included in the construction contract as a contract specification and implemented by the contractor during construction.	A copy of the construction contract including MM AES-1 shall be retained in the project file(s). Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft Program Environmental Impact Report (Draft PEIR)
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer/Architect Construction Contractor	Implementing Agency[1]	

Mitigation Measure	Implementation Schedule	Verification	Source
Aesthetics <u>Light and Glare</u> AES-2 To avoid any light intrusion to surrounding land uses, on project sites where permanent exterior lighting is proposed, lights shall be shielded and directed downward and toward the interior of a site. The maximum light allowed beyond the property boundary adjacent to sensitive light receptors shall be as stipulated in local design guidelines or development code and except where such compliance is not required by California law.	AES-2 shall be incorporated into individual project design specifications, which shall be included in the construction contract as a contract specification and implemented by the contractor during construction.	A copy of the construction contract including MM AES-2 shall be retained in the project file(s). Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Architect Construction Contractor	Implementing Agency	

[1] "Implementing Agency" as used throughout this Mitigation Monitoring and Reporting Program refers to the lead agency implementing a project under the Six Basins Strategic Plan (e.g., Three Valleys Municipal Water District (TVMWD), City of Pomona, City of La Verne, Six Basins Watermaster (Watermaster), or other Watermaster Parties).

Mitigation Measure	Implementation Schedule	Verification	Source
Aesthetics Light and Glare AES-3 Development of Strategic Plan projects shall comply with existing or future lighting ordinances, and except where such compliance is not required by California law.	AES-3 shall be incorporated into individual project design specifications, which shall be included in the construction contract as a contract specification and implemented by the contractor during construction.	A copy of the construction contract including MM AES-3 shall be retained in the project file(s). Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Architect Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Aesthetics Light and Glare AES-4 Any new structures that may require large facades shall not be constructed using highly reflective building materials.	AES-4 shall be incorporated into individual project design specifications, which shall be included in the construction contract as a contract specification and implemented by the contractor during construction.	A copy of the construction contract including MM AES-4 shall be retained in the project file(s). Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Architect Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Agriculture and Forestry Resources – No mitigation measures			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**

Mitigation Measure	Implementation Schedule	Verification	Source
Air Quality / Greenhouse Gas Emissions / Global Climate Change AQ-1 Construction contractors at each project site shall adhere to applicable measures contained in Table 1 of Rule 403 including, but not limited to: • All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions. • The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the mid-morning, afternoon, and after work is done for the day. • The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are limited to 15 miles per hour or less.	MM AQ-1 shall be implemented during construction of future facilities at existing sites identified in Project Category 1 and shall be included in the construction contract as a contract specification.	A copy of the construction contract including MM-AQ-1 shall be retained in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes from inspections shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Air Quality / Greenhouse Gas Emissions / Global Climate Change AQ-2 Regarding emissions of NOx and VOC, when using construction equipment greater than 150 horsepower (>150 HP), the Construction Contractor shall ensure that off-road diesel construction equipment complies with EPA/CARB Tier 4 emissions standards or equivalent and shall ensure that all construction equipment is tuned and maintained in accordance with the manufacturer's specifications.	MM AQ-2 shall be implemented during construction of future facilities at existing sites identified in Project Category 1 and shall be included in the construction contract as a contract specification.	A copy of the construction contract including MM-AQ-2 shall be retained in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes from inspections shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Air Quality / Greenhouse Gas Emissions / Global Climate Change AQ-3 SCAQMD Rule 403-Table 1 (see attached) lists a number of Best Available Control Technologies (BACT) that may apply to the construction of Strategic Plan projects. On a project-by-project basis, SCAQMD Rule 403 Table 1 shall be reviewed and appropriate measures incorporated into a project specific monitoring program.	MM AQ-3 shall be implemented during construction of future facilities at existing sites identified in Project Category 1 and shall be included in the construction contract as a contract specification.	A copy of the construction contract including MM-AQ-3 shall be retained in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes from inspections shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Biological Resources BIO-1a *Tree Removal*. Prior to the trimming or removal of a tree at any project site, a project proponent will coordinate with the local agency to determine if the particular trees targeted for trimming or removal are heritage trees regulated by local agency. If the targeted tree is a heritage under the City or County Regulations, the appropriated application will be submitted and approved by the local agency prior to conducting the trimming or removal of the heritage tree(s), except where compliance is not required by California law.	If tree removal or trimming is identified, MM BIO-1 shall be incorporated into individual project design specifications, which shall be included in the construction contract as a contract specification and implemented by the contractor during construction.	A copy of the construction contract including MM BIO-1 shall be retained in the project file(s). Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Biological Resources BIO-1b *Removal of Native Trees*. Prior to commencement of ground disturbing activities where native trees may require trimming or removal), and to address the potential spread of invasive pests and diseases by implementing the following: 1) Prior to tree trimming or removal, a certified arborist shall evaluate trees for infectious tree diseases including but not limited to: sudden oak death (*Phytophthora ramorum*), thousand canker fungus (*Geosmithia morbida*), polyphagous shot hole borer (*Euwallacea* spp.), and goldspotted oak borer (*Agrilus auroguttatus*) (TCD 2021; UCANR 2021; Phytosphere Research 2012; UCIPM 2013). 2) If a certified arborist determines trees are impacted by infectious pests or diseases, the certified arborist shall prepare an *Infectious Tree Disease Management Plan* or develop a detailed, robust, enforceable, and feasible list of preventative measures. A plan/list shall provide measures relevant for each tree pest or	MM BIO-1b shall be included in the construction contract as a contract specification. Prior to tree trimming or removal, a certified arborist shall evaluate trees for infectious tree diseases. If a certified arborist determines trees are impacted by infectious pests or diseases, the certified arborist shall prepare an *Infectious Tree Disease Management Plan* or develop a detailed, robust, enforceable, and feasible list of preventative measures. If possible, all tree material, especially infected tree material, shall be left on site. The material could be chipped for use as ground cover or mulch. Pruning and power tools should be cleaned and	A copy of the construction contract including MM BIO-1 shall be retained in the project file(s). Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR

Mitigation Measure	Implementation Schedule	Verification	Source
disease observed. To avoid the spread of infectious tree pests and diseases, infected trees should not be transported from a project area without first being treated using best available management practices described in the *Infectious Tree Disease Management Plan* or list of preventative measures. 3) If possible, all tree material, especially infected tree material, shall be left on site. The material could be chipped for use as ground cover or mulch. Pruning and power tools should be cleaned and disinfected before use to prevent introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas.	disinfected before use to prevent introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas.		
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Project Archaeologist	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Biological Resources			
BIO-2 *Nesting Birds*. Removal of any trees, shrubs, or any other potential nesting habitat shall be conducted outside the avian nesting season, as verified by a qualified Avian Biologist. The nesting season generally extends from February 1 through August 31, but it can vary slightly from year to year based on seasonal weather conditions. If ground disturbance and vegetation removal cannot occur outside of the qualified Avian Biologist's-verified nesting season, a pre-construction clearance survey for nesting birds shall be conducted within 30 days of the start of any construction. If no active nests are found, no further action would be required. If an active nest is found, the biologist shall set appropriate no-work buffers around the nest, which would be determined based on the nesting species, its sensitivity to disturbance, nesting stage and expected types, intensity and duration of disturbance. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved no-work buffer zone shall be clearly marked in the field, within which no disturbance activity shall commence until the qualified biologist has determined the young birds have successfully fledged and the nest is inactive.	MM BIO-2 shall be included in the construction contract as a contract specification. The preconstruction survey(s) shall be conducted prior to commencement of site disturbing activities. If an active bird nest is located, a qualified biologist shall prepare and implement a monitoring program to monitor the buffer area weekly where no construction activities shall occur until such time as the project biologist determines fledglings have left the nest.	A copy of the construction contract including MM BIO-2 shall be retained in the project file(s). A copy of the survey(s) shall be placed in the project file (if applicable). Verification of implementation shall be based on field notes provided by the biological monitor to the Implementing Agency. Field notes shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Project Biologist	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Cultural Resources / Tribal Cultural Resources			
CUL-1 Prior to approval of a project identified under Project Categories 1 through 3, a Watermaster Party undertaking a project shall retain a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology to conduct an assessment of the project site and vicinity for all project elements that involve ground disturbance. The archaeologist shall conduct cultural resources assessment consisting of: (1) a cultural resources records search to be conducted at the South Central Coastal Information Center located at California State University Fullerton; (2) consultation with the Native American Heritage Commission (NAHC) and with interested Native American tribes identified by NAHC; (3) a field survey by the archaeologist; and (4) recordation of all identified archaeological resources located on a project site on California Department of Parks and Recreation 523 Site Record forms. The archaeologist shall provide recommendations regarding resource significance and additional work for those resources that may be affected by a project.	MM CUL-1 shall be included in the construction contract as a contract specification. The Cultural Resources Assessment (CRA) (if required) shall be completed prior to approval of a project by the Implementing Agency. Should the CRA determine that resources may be uncovered during construction, an Archaeological monitor shall prepare and implement a monitoring program. The Implementing Agency shall be notified within 24-hours of any accidental exposure of subsurface cultural resources. After a determination is made and the significance of the find determined, the management recommendations shall be implemented and documented.	A copy of the construction contract including MM CUL-1 shall be retained in the project file(s). A copy of the Cultural Resources Assessment and Monitoring Program (if applicable) shall be placed in the project file. A copy of the construction contract shall be retained in the project file. A final report of findings shall be submitted to the Implementing Agency for retention. Field notes from Archaeological monitor shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Project Archaeologist	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Cultural Resources / Tribal Cultural Resources			
CUL-2 Prior to ground disturbance activities at a project site that contain structures 45 years old or older, affected structure(s) shall be subject to a historic built environment survey, and potentially historic structures shall be evaluated for their potential historic significance, prior to a Watermaster Party's finalization of design/site plans. The survey shall be carried out by a qualified historian or architectural historian meeting the Secretary of the Interior's Standards for Architectural History. If potentially significant resources are encountered during the survey, a treatment plan shall be prepared prior to demolition or substantial alteration of such resources identified.	MM CUL-2 shall be included in the construction contract as a contract specification. Prior to demolition or substantial alteration of a potential historic building, a qualified architectural historian shall conduct a Historic Built Environment Survey. If a resource is identified, a treatment plan shall be prepared,	A copy of the construction contract including MM CUL-2 shall be retained in the project file. A copy of the Historic Built Environment Survey Cultural Resources Assessment and Monitoring Program (if applicable) shall be placed in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Architectural Historian	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Cultural Resources / Tribal Cultural Resources			
CUL-3 In the event that human remains are uncovered at a project site, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until: • The coroner of the county in which the remains are discovered must be contacted to determine whether an investigation of the cause of death is required, and • If the coroner determines the remains to be Native American: ○ The coroner shall contact the Native American Heritage Commission within 24 hours.	MM CUL-3 shall be included in the construction contract as a contract specification. During ground disturbing activities and in the event that human remains are uncovered at a project site the coroner shall be called to determine whether an investigation is required Disposition of any remains identified as Native American shall be determined through consultation with the MLD.	A copy of the construction contract including MM CUL-3 shall be retained in the project file. Excavation or disturbance shall cease and the coroner of the county in which the remains are discovered must be contacted. If the remains are Native American. disposition of the remains shall be by agreement between the coroner and the most likely descendent.	Draft PEIR

Mitigation Measure	Implementation Schedule	Verification	Source
CUL-3 (cont.) ○ The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American. ○ The most likely descendent (MLD) may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98. • Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance: ○ The Native American Heritage Commission is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 24 hours after being notified by the commission. ○ The descendant identified fails to make a recommendation; or ○ The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.			
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Cultural Resources / Tribal Cultural Resources			
CUL-4 Prior to approval of a project, the lead agency with authority to approve the project. shall conduct AB 52 consultation with Native American tribes based on a list provided by the NAHC. If the lead agency determines that a project may cause a substantial adverse change to a tribal cultural resource, identified through project-specific AB 52 consultation, and measures are not otherwise identified in the consultation process required under PRC Section 21080.3.2, the Watermaster Party undertaking the project shall implement the following measures where feasible and necessary to address site specific impacts to avoid or minimize the significant adverse impacts: • Avoidance and preservation of the resources in place, including, but not limited to: planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria. • Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: o Protecting the cultural character and integrity of the resource; o Protecting the traditional use of the resource; or o Protecting the confidentiality of the resource • Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places. • Protecting the resource.	Prior to approval of a project, the Implementing Agency with authority to approve the project. shall conduct AB 52 consultation with Native American tribes based on a list provided by the NAHC. See MM CUL-1 for requirements for the preparation of a Cultural Resources Assessment. If Cultural Resources are uncovered, further consultation with NAHC and the Native American tribe consulting on the project shall be undertaken to determine how to avoid or minimize impacts including avoidance/preservation in place and a permanent conservation easement. Site specific impacts to Cultural Resources shall be addressed prior to returning to the area where the resources were uncovered to continue construction.	A copy of the construction contract including MM CUL-4 shall be retained in the project file. A copy of the construction contract shall be retained in the project file. Excavation or disturbance of cultural resources shall cease until the Project Archaeologist determines the significance of the find. A final report of findings shall be submitted to the City for retention. Field notes from Archaeologist shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Environmental Justice Refer to mitigation measures AQ-1 and AQ-2			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Environmental Justice <u>Hazards / Emissions</u> Refer to mitigation measure HAZ-1			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Environmental Justice <u>Construction Traffic Management Plan</u> Refer to mitigation measures TR-1, TR-2 and TR-3			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Geology / Soils / Paleontological Resources / Mineral Resources <u>Geology and Soils</u> GEO-1 Should a project in any of the categories of projects be located within a designated Alquist-Priolo Fault Zone, the project proponent shall consider relocating the project to another site. If that is not feasible, then the project shall be designed in accordance with the most current version of the CBC and subject to a project specific Geotechnical Investigation.	The design level geotechnical investigation shall be completed prior to completion of facility design. The measures identified in the geotechnical investigation shall be incorporated into individual project design specifications. Site specific design criteria shall be included in the construction contract as contract specifications.	A copy of the geotechnical investigation shall be retained in the project file(s). A copy of the construction contract including this geology/soils mitigation measure shall be retained in the project file(s). Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Project Geologist Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Geology / Soils / Paleontological Resources / Mineral Resources <u>Geology and Soils</u> GEO-2 Prior to approval of a project, a design-level geotechnical investigation shall be completed. The investigation shall identify all potential seismic hazards including fault rupture, and characterize the soil profiles, including liquefaction potential, expansive soil potential, and potential for subsidence to occur. The geotechnical investigation shall recommend site-specific design criteria to mitigate for seismic and non-seismic hazards, such as special foundations and structural setbacks, and these recommendations shall be incorporated into the design of individual projects.	The design level geotechnical investigation shall be completed prior to completion of facility design. The measures identified in the geotechnical investigation shall be incorporated into individual project design specifications. Site specific design criteria shall be included in the construction contract as contract specifications.	A copy of the geotechnical investigation shall be retained in the project file(s). A copy of the construction contract including this geology/soils mitigation measure shall be retained in the project file(s). Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Project Geologist Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Geology / Soils / Paleontological Resources / Mineral Resources <u>Paleontological Resources</u> GEO-3 For project-level development involving ground disturbance, prior to commencement of ground disturbance a qualified paleontologist shall be retained to determine the necessity of conducting a study of the project area(s) based on the potential sensitivity of the project site for paleontological resources. If deemed necessary, the paleontologist shall conduct a paleontological resources inventory designed to identify potentially significant resources. The paleontological resources inventory would consist of: a paleontological resource records search to be conducted at the San Bernardino County Museum and/or other appropriate facilities; a field survey or monitoring where deemed appropriate by the paleontologist; and recordation of all identified paleontological resources.	MM GEOL-3 shall be included in the construction contract as a contract specification. Prior to commencement of ground disturbance, a qualified paleontologist shall be retained to determine the necessity of conducting a study of the project area(s) based on the potential sensitivity of the project site for paleontological resources. If required, prior to commencement of ground disturbing activities, a qualified paleontologist shall conduct a paleontological resources inventory of a project site.	A copy of the construction contract including MM GEO-3 shall be retained in the project file. A copy of the paleontological resources inventory (if prepared) shall be placed in the project file. If a monitor is required, field notes from the Paleontological monitor shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Project Paleontologist	Three Valley MWD	

Mitigation Measure	Implementation Schedule	Verification	Source
Hazards and Hazardous Materials / Airport Safety / Wildfire Hazards Hazards / Emissions HAZ-1 Permits. Prior to installation of new or relocated equipment, or prior to modification of any existing equipment, the Watermaster Party responsible for a project site where treatment facilities are located, or a diesel operated back-up generator is proposed, shall obtain a Permit to Construct from SCAQMD. Once a piece of equipment is installed, modified and/or operated, SCAQMD will process the application for a Permit to Operate.	MM HAZ-1 shall be included in the construction contract as a contract specification. Prior to installation of new or relocated equipment, or prior to modification of any existing equipment, obtain a Permit to Construct and Permit to Operate from SCAQMD.	A copy of the construction contract including MM HAZ-1 shall be retained in the project file. A copy of the SCAQMD permits shall be placed in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Hazards and Hazardous Materials / Airport Safety / Wildfire Hazards Emergency Planning Refer to mitigation measures TR-1, TR-2 and TR-3			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Hydrology / Water Quality			
HWQ-1 <u>Groundwater Production</u>. To avoid potential impacts associated with the loss of groundwater that may migrate out of the Pomona Basin or UCHB during periods of high groundwater levels, prior to commencement of improvements to existing groundwater production wells, or the development of new production wells in the Pomona Basin and UCHB, Watermaster staff shall conduct groundwater modeling in areas where high groundwater is known to occur in the area along the San Jose fault.	Prior to commencement of improvements to existing groundwater production wells, or the development of new production wells in the Pomona Basin and UCHB conduct groundwater modeling.	Results of groundwater modeling shall be presented to the Six Basins Watermaster Board for review.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Watermaster Staff	Watermaster Staff	

Mitigation Measure	Implementation Schedule	Verification	Source
Hydrology / Water Quality			
HWQ-2 <u>Implementation of a SWPPP and the Use of BMPs During Construction</u>. Prior to commencement of any ground disturbing activities on a project site, the Watermaster Party or construction contractor shall prepare a SWPPP (area of disturbance one acre or greater) and submit a Notice of Intent to the State Water Resources Control Board. Implementation of BMPs as outlined in the SWPPP shall be on-going during construction activities. A copy of the SWPPP and the Waste Discharge Identification (WDID) number, shall be kept at the construction site and available for review by inspectors until construction is completed. For sites where the area of disturbance would be less than one acre, the project proponent or construction contractor is still responsible for maintaining the site and must provide the local jurisdiction in which construction activities will take place, with a list of BMPs and a schedule for completion of such activities, prior to commencement of construction activities.	MM HWQ-2 shall be included in the construction contract as a contract specification. Prior to commencement of any ground disturbing activities, the Project Engineer or Construction Contractor shall submit a Notice of Intent (NOI) to the State Water Resources Control Board to receive a Waste Discharge Identification Number (WDID). Provide a copy of the site-specific SWPPP and WDID to the Implementing Agency.	A copy of the construction contract including MM HWQ-2 shall be retained in the project file. A copy of the SWPPP and NOI shall be provided to the Implementing Agency. A copy of the SWPPP and NOI shall be kept at the construction site for review during site inspections by the Implementing Agency.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Hydrology / Water Quality			
HWQ-3 <u>Implementation of a Drainage Plan to Reduce Downstream Flows</u>. Prior to construction of project facilities, the Watermaster Party proposing a project shall prepare a drainage plan that includes design features to reduce stormwater peak concentration flows exiting the above ground facility sites so that the capacities of the existing downstream drainage facilities are not exceeded. These design features could include bioretention, sand infiltration, return of stormwater for treatment within the treatment plant, and/or detention facilities.	MM HWQ-3 shall be included in the construction contract as a contract specification. The Drainage Plan shall be completed prior to commencement of ground disturbance and shall show how post-construction site drainage would be controlled.	A copy of the construction contract including MM HWQ-3 shall be retained in the project file. A copy of the Drainage Plan shall be submitted to the Implementing Agency prior to commencement of ground disturbance for review and approval. A copy of the Drainage Plan shall be kept in the file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Hydrology / Water Quality HWQ-4 <u>Dewatering General Permit</u>. Prior to commencement of construction activities that would require dewatering and conveyance of groundwater to surface water including but not limited to a storm drain system, the Watermaster Party proposing a project shall submit a Notice of Intent (NOI) to SWRCB under the requirements of the NPDES Dewatering General Permit. The NOI shall include any additional information including a list of BMPs for preventing degradation of water quality or impairment of receiving waters.	MM HWQ-4 shall be included in the construction contract as a contract specification. Prior to commencement of construction activities that would require dewatering, the Watermaster Party undertaking the project shall submit an NOI to SWRCB under the requirements of the State's NPDES Dewatering General Permit. SWRCB shall issue a written determination of eligibility for coverage under the General Permit.	A copy of the construction contract including MM HWQ-4 shall be retained in the project file. A copy of the project's permit for coverage under NPDES Dewatering General Permit shall be provided to the Implementing Agency prior to commencement of well drilling. A copy of the NOI and permit shall be kept in the file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Land Use / Planning No mitigation measures			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**

Mitigation Measure	Implementation Schedule	Verification	Source
Noise <u>Construction</u> NOI-1 The following mitigation measures are required to reduce noise and vibration levels produced by the construction equipment at nearby, occupied sensitive receiver locations: • A focused construction noise and vibration mitigation plan shall be required if any or both of the following screening criteria are met: ○ If project construction activities would occur within 100 feet of occupied, sensitive receiver locations (e.g., residential, school, etc. uses): - A focused construction noise mitigation plan shall be required which evaluates whether project construction noise levels would exceed the 65 dBA Leq exterior noise level limit at occupied sensitive receiver locations, and the mitigation measures (if any) necessary to satisfy the 65 dBA Leq exterior noise level limit. - Potential mitigation measures to reduce project construction noise levels include, but are not limited to, temporary noise barriers, the use of alternative equipment, noise level monitoring, temporary relocation of residents, or a combination of the above.	MM NOI-1 shall be included in the construction contract as a contract specification. Prior to commencement of construction activities, a focused Construction Noise and Vibration Mitigation Plan shall be prepared if screening criteria for noise generating construction activities in excess of local Noise Standards are met. Implementation of the Construction Noise and Vibration Mitigation Plan shall be implemented throughout the construction period when screening criteria are met.	A copy of the construction contract including MM NOI-1 shall be placed in the project file. A copy of the Construction Noise and Vibration Mitigation Plan shall be placed in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Noise Construction NOI-2 During all project site construction, the construction contractors shall ensure that all construction equipment, fixed or mobile, shall have properly operating and maintained mufflers, consistent with manufacturers' standards. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise-sensitive receivers nearest the project site.	MM NOI-2 shall be included in the construction contract as a contract specification. Prior to commencement of construction activities, the construction contractor shall provide the Implementing Agency with a list of construction equipment and vehicles and verify that all equipment and vehicles are in good operational condition per manufacturers standards.	A copy of the construction contract including MM NOI-2 shall be placed in the project file. A copy of the equipment/vehicle list shall be placed in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Noise Construction NOI-3 The construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receivers nearest the project site during all project construction (i.e., the center of each site).	MM NOI-2 shall be included in the construction contract as a contract specification. Prior to commencement of construction activities, the construction contractor shall provide the Implementing Agency with a site plan showing where staging areas will be located during construction to ensure that all stationary construction equipment that emit noise, is directed away from the noise-sensitive receivers nearest the project site.	A copy of the construction contract including MM NOI-2 shall be placed in the project file. A copy of the Site Plan showing the location of the staging area shall be placed in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Noise Construction NOI-4 The contractor shall design delivery routes of equipment and materials to minimize the exposure of sensitive land uses or residential dwellings to delivery truck-related noise.	MM NOI-4 shall be included in the construction contract as a contract specification. Prior to commencement of construction activities, the construction contractor shall provide the Implementing Agency with a map showing delivery routes. All vendors making deliveries of equipment and materials shall be provided with a copy of the map of delivery routes.	A copy of the construction contract including MM NOI-4 shall be placed in the project file. A copy of the delivery route map showing the location of the staging area shall be placed in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency Correspondence documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Noise <u>Construction</u> NOI-5 If high vibration-generating project construction activities such as well drilling equipment, heavy mobile equipment (greater than 80,000 pounds), or large loaded trucks would be used: • Within 25 feet of occupied, sensitive receiver locations in the cities of Claremont, Pomona, La Verne, and Upland; or • Within 50 feet of occupied, sensitive receiver locations in unincorporated County of Los Angeles: o A focused construction vibration mitigation plan shall be required which evaluates whether project construction vibration levels would exceed the exterior vibration level limit at occupied sensitive receiver locations, specific to that jurisdiction's standards, and the mitigation measures (if any) necessary to satisfy the exterior vibration level limit. - Potential mitigation measures to reduce project construction vibration levels include, but are not limited to, the use of alternative equipment, vibration level monitoring, temporary relocation of residents, or a combination of the above.	MM NOI-5 shall be included in the construction contract as a contract specification. Prior to commencement of construction activities, a focused Construction Vibration Mitigation Plan shall be prepared and submitted to the Implementing Agency for review and approval if either of the two distance criteria identified in the measure are met. The Construction Vibration Mitigation Plan shall be implemented throughout the construction schedule or until such time as the high-vibration activities cease.	A copy of the construction contract including MM NOI-5 shall be placed in the project file. A copy of the approved Construction Vibration Mitigation Plan shall be placed in the project file. Verification of implementation shall be through reporting by the construction contractor to the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Noise Operation NOI-6 The following operational noise abatement measures shall be required to further reduce the potential operational noise levels received at nearby sensitive receiver locations: • New, or existing unenclosed, well pumps shall be enclosed to further reduce operational noise levels at nearby sensitive receiver locations (e.g., residential homes). The location of any louvres or openings in the enclosure assembly would reduce the overall noise reduction of the enclosure, and therefore, shall be oriented away from nearby residential homes, if feasible. In addition, acoustically-rated louvres and materials within the enclosure construction are recommended to further reduce the noise levels at the well pump source. • All trucks transiting on-site in outdoor areas of the project facilities should be operated with properly functioning and well-maintained mufflers. • Maintain quality pavement conditions on the property that are free of vertical deflection (i.e., speed bumps) to minimize truck noise. • Truck access gates and loading areas should have posted signs which state: 1. Truck drivers shall turn off engines when not in use; 2. No music or electronically reinforced speech from workers should be audible at noise-sensitive properties.	MM NOI-6 shall be included in the construction contract as a contract specification. Prior to approval of a project, the Site Plan showing how operational noise abatement measures shall be incorporated into the design of new facilities. The Site Plan shall be reviewed and approved by the Implementing Agency. During long-term operation of a project, if changes to the approved operational noise abatement measures, such changes shall be submitted to the Implementing Agency for review and approval.	A copy of the construction contract including MM NOI-6 shall be placed in the project file. A copy of the approved Site Plan shall be placed in the project file. Verification of implementation during construction shall be through reporting by the construction contractor to the Implementing Agency. Field notes documenting verification shall be retained in the project file. Verification of approved changes to the operation of a facility shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Architect Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Population / Housing No mitigation measures			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**

Mitigation Measure	Implementation Schedule	Verification	Source
Public Services and Recreation <u>Emergency Planning and Traffic Control</u> Refer to mitigation measures TR-1, TR-2, TR-3			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Public Services and Recreation <u>Wildland Fire</u> No Project Category 1 projects are located in a high fire hazard zone			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**

Mitigation Measure	Implementation Schedule	Verification	Source
Transportation TR-1 Prior to initiating construction of proposed facilities, the Watermaster Party proposing a project or the designated construction contractor, shall prepare and implement a Construction Traffic Management Plan that contains comprehensive strategies for maintaining emergency access on public streets. In general, the Construction Traffic Management Plan shall ensure that to the extent practical, construction traffic would access a project site during off-peak hours or limited access during the peak hours; and that construction traffic would be routed to avoid travel through, or proximate to, sensitive land uses. The Plan shall also include, where necessary, the use of flags, signs and lights, as well as flag persons to direct traffic. Where a project includes new pipelines to connect wells to treatment facilities or to connect the Pomona WTP to the new SASG recharge basin, strategies shall include, but are not limited to, maintaining steel trench plates on public streets to restore access across open trenches and identification of alternate routing around construction zones. Police, fire, and other emergency service providers shall be notified of the timing, location, and duration of the construction activities and the location of detours and lane closures. The Watermaster Party proposing a project, or designated construction contractor shall ensure that the Construction Traffic Management Plan and other construction activities are consistent with the Emergency Response Plan of the jurisdiction in which the project is being constructed.	MM TR-1 shall be included in the construction contract as a contract specification. Prior to initiating construction of proposed facilities, the Watermaster Party proposing a project or the designated construction contractor, shall prepare and implement a Construction Traffic Management Plan. The Watermaster Party proposing a project, or designated construction contractor shall ensure that the Construction Traffic Management Plan and other construction activities are consistent with the Emergency Response Plan of the jurisdiction in which the project is being constructed.	A copy of the construction contract including MM TR-1 shall be retained in the project file. A copy of the Construction Traffic Management Plan shall be placed in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Transportation TR-2 As part of the Construction Traffic Management Plan, it shall be stipulated that the delivery and removal of heavy equipment shall be conducted during off- peak hours to minimize the heavy truck activity during the morning and evening peak periods (7 to 9 am and 4 to 6 pm) in order to have nominal impacts to traffic and circulation near the vicinity of a project.	See Implementation Schedule for MM TR-1.	See Verification notes in MM NOI-1.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Transportation TR-3 During the site grading, where export of material is required, the construction contractor shall limit export activity between the hours of 7 to 9 am (morning peak period) and 4 to 6 pm (evening peak period) to fewer than the equivalent of 50 passenger car equivalent (PCE) truck trips per hour. 50 PCE truck trips equates to approximately 16 total trucks (8 trucks in and 8 trucks out) during the peak periods specified above in order to limit the potential impacts of haul truck activity during these busy commute times: *50 PCE truck trips / 3.0 PCE factor =* *16 total trucks during the peak hour*	See Implementation Schedule for MM TR-1.	See Verification notes in MM NOI-1.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Utilities / Service Systems / Energy			
USS-1 <u>Implementation of a Drainage Plan to Reduce Downstream Flows</u>. Prior to construction of project facilities, the Watermaster Party proposing a project shall prepare a drainage plan that includes design features to reduce stormwater peak concentration flows exiting the above ground facility sites so that the capacities of the existing downstream drainage facilities are not exceeded. These design features could include bioretention, sand infiltration, return of stormwater for treatment within the treatment plant, and/or detention facilities.	MM USS-1 shall be included in the construction contract as a contract specification. The Drainage Plan shall be completed prior to commencement of ground disturbance and shall show how post-construction site drainage would be controlled.	A copy of the construction contract including MM USS-1 shall be retained in the project file. A copy of the Drainage Plan shall be submitted to the Implementing Agency prior to commencement of ground disturbance for review and approval. A copy of the Drainage Plan shall be kept in the file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Utilities / Service Systems / Energy			
USS-2 <u>Implementation of a Construction and Demolition Disposal Plan</u>. Prior to commencement of construction, the contractor shall prepare a Construction and Demolition C&D) disposal plan for review and approval by the local jurisdiction where construction will occur. Per CGBC Section 45.408.1.1, *Construction Waste Management Plan*, the C&D Disposal Plan shall include the following elements: 1. Identifies the construction and demolition waste materials to be diverted from disposal by efficient usage, recycling, reuse on the project or salvage for future use or sale. 2. Determines if construction and demolition waste materials will be sorted on-site (source-separated) or bulk mixed (single stream). 3. Identifies diversion facilities where construction and demolition waste material collected will be taken. 4. Specifies that the amount of construction and demolition waste materials diverted shall be calculated by weight or volume, but not by both.	MM USS-2 shall be included in the construction contract as a contract specification. The Construction and Demolition Disposal Plan shall be completed prior to commencement of construction and be implemented throughout construction activities.	A copy of the construction contract including MM USS-2 shall be retained in the project file. A copy of the Construction and Demolition Disposal Plan shall be submitted to the Implementing Agency prior to commencement of ground disturbance for review and approval. A copy of the Construction and Demolition Disposal Plan shall be kept in the file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Aesthetics <u>Facilities and Landscaping</u> AES-1 Proposed facilities, including walls, gates, treatment facilities, etc., shall be designed in accordance with local design standards in order to be complementary to the local area. Landscaping shall be installed and maintained in conformance with local landscaping design guidelines as appropriate to screen views of new facilities from surrounding areas to the extent feasible taking into consideration the needs of the project and except where such compliance is not required by California law.	AES-1 shall be incorporated into individual project design specifications, which shall be included in the construction contract as a contract specification and implemented by the contractor during construction.	A copy of the construction contract including MM AES-1 shall be retained in the project file(s). Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft Program Environmental Impact Report (Draft PEIR)
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer/Architect Construction Contractor	Implementing Agency[1]	

Mitigation Measure	Implementation Schedule	Verification	Source
Agriculture and Forestry Resources – No mitigation measures			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**

[1] "Implementing Agency" as used throughout this Mitigation Monitoring and Reporting Program refers to the lead agency implementing a project under the Six Basins Strategic Plan (e.g., Three Valleys Municipal Water District (TVMWD), City of Pomona, City of La Verne, Six Basins Watermaster (Watermaster), or other Watermaster Parties).

Mitigation Measure	Implementation Schedule	Verification	Source
Air Quality / Greenhouse Gas Emissions / Global Climate Change AQ-1 Construction contractors at each project site shall adhere to applicable measures contained in Table 1 of Rule 403 including, but not limited to: • All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions. • The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the mid-morning, afternoon, and after work is done for the day. • The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are limited to 15 miles per hour or less.	MM AQ-1 shall be implemented during construction of future recharge facilities identified in Project Category 2 and shall be included in the construction contract as a contract specification.	A copy of the construction contract including MM-AQ-1 shall be retained in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes from inspections shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Air Quality / Greenhouse Gas Emissions / Global Climate Change AQ-2 Regarding emissions of NOx and VOC, when using construction equipment greater than 150 horsepower (>150 HP), the Construction Contractor shall ensure that off-road diesel construction equipment complies with EPA/CARB Tier 4 emissions standards or equivalent and shall ensure that all construction equipment is tuned and maintained in accordance with the manufacturer's specifications.	MM AQ-2 shall be implemented during construction of future recharge facilities identified in Project Category 2 and shall be included in the construction contract as a contract specification.	A copy of the construction contract including MM-AQ-2 shall be retained in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes from inspections shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Air Quality / Greenhouse Gas Emissions / Global Climate Change AQ-3 SCAQMD Rule 403-Table 1 lists a number of Best Available Control Technologies (BACT) that may apply to the construction of Strategic Plan projects. On a project-by-project basis, SCAQMD Rule 403 Table 1 shall be reviewed and appropriate measures incorporated into a project specific monitoring program.	MM AQ-3 shall be implemented during construction of future recharge facilities identified in Project Category 2 and shall be included in the construction contract as a contract specification.	A copy of the construction contract including MM-AQ-3 shall be retained in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes from inspections shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Biological Resources BIO-1a *Tree Trimming or Removal*. Prior to the trimming or removal of a tree at any project site, a project proponent will coordinate with the local agency to determine if the particular trees targeted for trimming or removal are heritage trees regulated by local agency. If the targeted tree is a heritage under the City or County Regulations, the appropriated application will be submitted and approved by the local agency prior to conducting the trimming or removal of the heritage tree(s), except where compliance is not required by California law.	If tree removal or trimming is identified, MM BIO-1a shall be incorporated into individual project design specifications, which shall be included in the construction contract as a contract specification and implemented by the contractor during construction.	A copy of the construction contract including MM BIO-1a shall be retained in the project file(s). Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Project Biologist	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Biological Resources BIO-1b *Removal of Native Trees*. Prior to commencement of ground disturbing activities where native trees may require trimming or removal), and to address the potential spread of invasive pests and diseases by implementing the following: 1) Prior to tree trimming or removal, a certified arborist shall evaluate trees for infectious tree diseases including but not limited to: sudden oak death (*Phytophthora ramorum*), thousand canker fungus (*Geosmithia morbida*), polyphagous shot hole borer (*Euwallacea* spp.), and goldspotted oak borer (*Agrilus auroguttatus*) (TCD 2021; UCANR 2021; Phytosphere Research 2012; UCIPM 2013). 2) If a certified arborist determines trees are impacted by infectious pests or diseases, the certified arborist shall prepare an *Infectious Tree Disease Management Plan* or develop a detailed, robust, enforceable, and feasible list of preventative measures. A plan/list shall provide measures relevant for each tree pest or disease observed. To avoid the spread of infectious tree pests and diseases, infected trees should not be transported from a project area without first being treated using best available management practices described in the *Infectious Tree Disease Management Plan* or list of preventative measures. 3) If possible, all tree material, especially infected tree material, shall be left on site. The material could be chipped for use as ground cover or mulch. Pruning and power tools should be cleaned and disinfected before use to prevent introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas.	MM BIO-1b shall be included in the construction contract as a contract specification. Prior to tree trimming or removal, a certified arborist shall evaluate trees for infectious tree diseases. If a certified arborist determines trees are impacted by infectious pests or diseases, the certified arborist shall prepare an *Infectious Tree Disease Management Plan* or develop a detailed, robust, enforceable, and feasible list of preventative measures. I If possible, all tree material, especially infected tree material, shall be left on site. The material could be chipped for use as ground cover or mulch. Pruning and power tools should be cleaned and disinfected before use to prevent introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas.	A copy of the tree evaluation by a certified arborist shall be retained in the project file(s). A copy of the *Infectious Tree Disease Management Plan* by a certified arborist shall be retained in the project file(s). Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Final PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Project Biologist	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Biological Resources			
BIO-2 *Nesting Birds*. Removal of any trees, shrubs, or any other potential nesting habitat shall be conducted outside the avian nesting season, as verified by a qualified Avian Biologist. The nesting season generally extends from February 1 through August 31, but it can vary slightly from year to year based on seasonal weather conditions. If ground disturbance and vegetation removal cannot occur outside of the qualified Avian Biologist's-verified nesting season, a preconstruction clearance survey for nesting birds shall be conducted within 30 days of the start of any vegetation. If no active nests are found, no further action would be required. If an active nest is found, the biologist shall set appropriate no-work buffers around the nest, which would be determined based on the nesting species, its sensitivity to disturbance, nesting stage and expected types, intensity and duration of disturbance. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved no-work buffer zone shall be clearly marked in the field, within which no disturbance activity shall commence until the qualified biologist has determined the young birds have successfully fledged and the nest is inactive.	MM BIO-2 shall be included in the construction contract as a contract specification. The preconstruction survey(s) shall be conducted prior to commencement of site disturbance activities. If an active bird nest is located, a qualified biologist shall prepare and implement a monitoring program to periodically monitor the buffer area where no construction activities shall occur until such time as the project biologist determines fledglings have left the nest.	A copy of the construction contract including MM BIO-2 shall be retained in the project file(s). A copy of the survey(s) shall be placed in the project file (if applicable). Verification of implementation shall be based on field notes provided by the biological monitor to the Implementing Agency. Field notes shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Project Biologist	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Biological Resources BIO-3 *Additional Biological Resources Assessments*. Prior to the approval of future projects on sites not identified in this EIR and occurring within an undeveloped area, or sites within the SASG or TCSG where new recharge basins and related infrastructure are proposed, a biological assessment shall be made of the selected or potential sites to determine if sensitive biological resources (sensitive plant community, sensitive species, jurisdiction waters) are present. If a sensitive biological resource is present, an analysis will be made of the potential for impact to the resource, an appropriate mitigation strategy will be developed and submitted to the wildlife and regulatory agencies with authority to review and approve the mitigation strategy as reducing impacts to less than significant. Either appropriate avoidance ~~and~~ or minimization measures will be developed to offset any potential impact or offsite mitigation shall be provided to offset the impact. Where a species is State-listed, CDFW would require full mitigation under an Incidental Take Permit. At a minimum, the mitigation strategy shall (1) identify the affected SSC; (2) identify strategies for handling and relocation of individuals per CDFW guidance, and (3) identify compensatory mitigation for temporary or permanent loss of habitat that supports SSC (ratio to be determined in consultation with CDFW) and/or through acquisition of an Incidental Take Permit if a state listed or candidate species is determined to be present.	The Biological Resources Assessment shall be completed prior to commencement of any ground disturbing activities. Consultation with regulatory agencies (e.g., CDFW, ACOE) shall be completed prior to commencement of any ground disturbing activities.	A copy of the construction contract including MM BIO-2 shall be retained in the project file(s). MM BIO-3 shall be completed prior to approval of a project. If consultation with CDFW is required, the 2081 permit or Streambed Alteration agreement shall be provided to the construction contractor for implementation of measures required by the permit or agreement.	Administrative Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Project Biologist	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Biological Resources			
BIO-4 *Wetland Permits or Streambed Alteration Agreement*. Prior to approval of a project where permanent impacts in areas determined to be potential jurisdictional wetlands or riparian features, Waters of the State or Waters of the U.S., the Watermaster Party undertaking a project shall consult with the regulatory agencies (USACE, RWQCB and CDFW) to determine if a CWA 404 permit, CWA 401 or a Streambed Alternation Agreement under Fish and Game Code 1602 are required prior to development. Based on a notification pursuant to Fish and Game Code section 1602 and other information, CDFW will determine whether a Lake and Streambed Alteration (LSA) Agreement is required prior to conducting proposed activities. An LSA Notification shall include the following: 1) an analysis to demonstrate that concrete-lined or soft-bottom channels would not be impaired (e.g., aggraded, incised, increased suspended sediment), 2) a hydrological evaluation of the 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions, 3) whether dewatering/diversion of water may be necessary, and (if applicable) 4), an analysis of whether diversion structures would impact stormwater and dry season water flow, and the extent of those impacts, during the wet season (November through March), dry season (April through October), and both above-average and below-average water year. a) On- or offsite replacement of USACE / RWQCB jurisdictional waters of the U.S. and/or waters of the State at a ratio no less than 1:1 for permanent impacts and to restore the site to pre-project conditions for temporary impacts. Offsite replacement may include the purchase of mitigation credits at an agency-approved offsite mitigation bank or in-lieu fee program.	MM BIO-4 shall be included in the construction contract as a contract specification. Consultation with regulatory agencies ((USACE, RWQCB and CDFW) shall be completed prior to approval of the recharge project proposed to be undertaken. Replacement habitat or the purchase of mitigation credits in an existing mitigation bank shall be determined as part of the consultation. Timing of the development of replacement habitat on-site shall be determined during consultation.	A copy of the construction contract including MM BIO-4 shall be retained in the project file(s). A copy of the results of the consultation (e.g., permits, mitigation plan) shall be placed in the project file (if applicable). Verification of implementation shall be based on field notes provided by the biological monitor to the Implementing Agency. Field notes shall be retained in the project file.	Final PEIR

Mitigation Measure	Implementation Schedule	Verification	Source
b) On- or offsite replacement of CDFW jurisdictional streambed and associated riparian habitat shall occur at a ratio no less than 2:1 for permanent impacts and to restore the site to pre-project conditions for temporary impacts. Offsite replacement may include the purchase of mitigation credits at an agency-approved offsite mitigation bank or in-lieu fee program.			
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Project Biologist	Implementing Agency Regulatory Agencies	

Mitigation Measure	Implementation Schedule	Verification	Source
Cultural Resources / Tribal Cultural Resources			
CUL-1 Prior to approval of a project identified under Project Categories 1 through 3, a project proponent (Watermaster Party) shall retain a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology to conduct an assessment of the project site and vicinity for all project elements that involve ground disturbance. The archaeologist shall conduct cultural resources assessment consisting of: (1) a cultural resources records search to be conducted at the South Central Coastal Information Center located at California State University Fullerton; (2) consultation with the Native American Heritage Commission (NAHC) and with interested Native Americans identified by NAHC; (3) a field survey by the archaeologist; and (4) recordation of all identified archaeological resources located on a project site on California Department of Parks and Recreation 523 Site Record forms. The archaeologist shall provide recommendations regarding resource significance and additional work for those resources that may be affected by a project. Consultation with Native American tribes as set forth in Assembly Bill (AB) 52 shall be completed prior to a Watermaster Party approving a project.	MM CUL-1 shall be included in the construction contract as a contract specification. The Cultural Resources Assessment (CRA) shall be completed prior to approval of a project by the Implementing Agency. Should the CRA determine that resources may be uncovered during construction, an Archaeological monitor shall prepare and implement a monitoring program.	A copy of the construction contract including MM CUL-1 shall be retained in the project file(s). A copy of the Cultural Resources Assessment and Monitoring Program (if applicable) shall be placed in the project file. A copy of the construction contract shall be retained in the project file. The Implementing Agency shall be notified within 24-hours of any accidental exposure of subsurface cultural resources. After a determination is made and the significance of the find determined, the management recommendations shall be implemented and documented. A final report of findings shall be submitted to the Implementing Agency for retention. Field notes from Archaeological monitor shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Project Archaeologist	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Cultural Resources / Tribal Cultural Resources			
CUL-3 In the event that human remains are uncovered at a project site, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until: • The coroner of the county in which the remains are discovered must be contacted to determine that no investigation of the cause of death is required, and • If the coroner determines the remains to be Native American: o The coroner shall contact the Native American Heritage Commission within 24 hours. o The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American. o The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98. • Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance.	MM CUL-3 shall be included in the construction contract as a contract specification. During ground disturbing activities and in the event that human remains are uncovered at a project site.	A copy of the construction contract including MM CUL-3 shall be retained in the project file. Excavation or disturbance shall cease and the coroner of the county in which the remains are discovered must be contacted. If the remains are Native American. disposition of the remains shall be by agreement between the coroner and the most likely descendent.	Draft PEIR

Mitigation Measure	Implementation Schedule	Verification	Source
CUL-3 (cont.) o The Native American Heritage Commission is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 24 hours after being notified by the commission. o The descendant identified fails to make a recommendation; or o The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.			
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Project Archaeologist	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Cultural Resources / Tribal Cultural Resources CUL-4 Prior to approval of a project, the Watermaster Party undertaking the project shall conduct AB 52 consultation with Native American tribes based on a list provided by the NAHC. If the lead agency determines that a project may cause a substantial adverse change to a tribal cultural resource, identified through project-specific AB 52 consultation, and measures are not otherwise identified in the consultation process required under PRC Section 21080.3.2, Watermaster Parties shall implement the following measures where feasible and necessary to address site specific impacts to avoid or minimize the significant adverse impacts: • Avoidance and preservation of the resources in place, including, but not limited to: planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria. • Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: o Protecting the cultural character and integrity of the resource o Protecting the traditional use of the resource o Protecting the confidentiality of the resource • Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places. • Protecting the resource.	Prior to approval of a project, the Implementing Agency with authority to approve the project. shall conduct AB 52 consultation with Native American tribes based on a list provided by the NAHC. See MM CUL-1 for requirements for the preparation of a Cultural Resources Assessment. If Cultural Resources are uncovered, further consultation with NAHC and the Native American tribe consulting on the project shall be undertaken to determine how to avoid or minimize impacts including avoidance/ preservation in place and a permanent conservation easement. Site specific impacts to Cultural Resources shall be addressed prior to returning to the site where the resources were uncovered to continue construction.	A copy of the construction contract including MM CUL-4 shall be retained in the project file. A copy of the construction contract shall be retained in the project file. Excavation or disturbance of cultural resources shall cease until the Project Archaeologist determines the significance of the find. A final report of findings shall be submitted to the City for retention. Field notes from Archaeologist shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Project Archaeologist	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Environmental Justice Refer to mitigation measures AQ-1 and AQ-2			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Environmental Justice Hazards / Emissions Refer to mitigation measure HAZ-1			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Environmental Justice Hazards / Contamination Refer to mitigation measure HAZ-3			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Environmental Justice Construction Traffic Management Plan Refer to mitigation measures TR-1, TR-2 and TR-3			Administrative Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Geology / Soils / Paleontological Resources / Mineral Resources <u>Geology and Soils</u> GEO-1 Should a project in any of the categories of projects be located within a designated Alquist-Priolo Fault Zone, the project proponent shall consider relocating the project to another site. If that is not feasible, then the project shall be designed in accordance with the most current version of the CBC and subject to a project specific Geotechnical Investigation.	The design level geotechnical investigation shall be completed prior to completion of facility design. The measures identified in the geotechnical investigation shall be incorporated into individual project design specifications. Site specific design criteria shall be included in the construction contract as contract specifications.	A copy of the geotechnical investigation shall be retained in the project file(s). A copy of the construction contract including this geology/soils mitigation measure shall be retained in the project file(s). Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Project Geologist Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Geology / Soils / Paleontological Resources / Mineral Resources <u>Geology and Soils</u> GEO-2 Prior to approval of a project, a design-level geotechnical investigation shall be completed. The investigation shall identify all potential seismic hazards including fault rupture, and characterize the soil profiles, including lique-faction potential, expansive soil potential, and potential for subsidence to occur. The geotech-nical investigation shall recommend site-specific design criteria to mitigate for seismic and non-seismic hazards, such as special foundations and structural setbacks, and these recommendations shall be incorporated into the design of individual projects.	The design level geotechnical investigation shall be completed prior to completion of facility design. The measures identified in the geotechnical investigation shall be incorporated into individual project design specifications. Site specific design criteria shall be included in the construction contract as contract specifications.	A copy of the geotechnical investigation shall be retained in the project file(s). A copy of the construction contract including this geology/soils mitigation measure shall be retained in the project file(s). Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Project Geologist Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Geology / Soils / Paleontological Resources / Mineral Resources <u>Paleontological Resources</u> GEO-3 For project-level development involving ground disturbance, a qualified paleontologist shall be retained to determine the necessity of conducting a study of the project area(s) based on the potential sensitivity of the project site for paleontological resources. If deemed necessary, the paleontologist shall conduct a paleontological resources inventory designed to identify potentially significant resources. The paleontological resources inventory would consist of: a paleontological resource records search to be conducted at the San Bernardino County Museum and/or other appropriate facilities; a field survey or monitoring where deemed appropriate by the paleontologist; and recordation of all identified paleontological resources.	MM GEOL-3 shall be included in the construction contract as a contract specification. Prior to commencement of ground disturbance, a qualified paleontologist shall be retained to determine the necessity of conducting a study of the project area(s) based on the potential sensitivity of the project site for paleontological resources. If required, prior to commencement of ground disturbing activities, a qualified paleontologist shall conduct a paleontological resources inventory of a project site.	A copy of the construction contract including MM GEO-3 shall be retained in the project file. A copy of the paleontologists finding that a project may/may not uncover paleontological inventory and whether a monitor is required during construction, shall be retained in the project file. A copy of the paleontological resources inventory (if prepared) shall be placed in the project file. If a monitor is required, field notes from the Paleontological monitor shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Project Paleontologist Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Hazards and Hazardous Materials / Airport Safety / Wildfire Hazards <u>Hazards / Vector Control</u> HAZ-2 Prior to the initial use of new or expanded recharge basins within spreading grounds, Watermaster Parties proposing new recharge basins or expansion of existing recharge basins in spreading grounds shall coordinate with the local vector control agencies (West Valley MVCD or SGVMVCD) to develop a strategy/plan to minimizes occurrence of vectors, such as midges and mosquitos; and to establish protocols for monitoring and eradicating vectors should they be found when basins are in use (filled with water). Monitoring to determine presence/absence of vectors during periods when recharge basins are holding water shall be the responsibility of the individual Watermaster Party to engage the services of a vector control professional. Should monitoring have positive results, the vector control professional shall work with the Vector Control District to implement control measures as set forth in the approved strategy/plan. The strategy/plan shall be prepared and available to be implemented prior to initiating the use of a new recharge basins or expansion area of an existing recharge basins.	Prior to the initial use of new or expanded recharge basins within spreading grounds, the Watermaster Party proposing a new recharge basin or expansion of existing recharge basins shall coordinate with the local vector control agencies to develop a strategy/plan (Vector Control Plan) to minimizes occurrence of vectors, such as midges and mosquitos. The Vector Control Plan shall include a list of protocols for monitoring and eradicating vectors should they be found when basins are in use (filled with water). MM HAZ-3 shall be included in the construction contract as a contract specification.	A copy of the construction contract including MM HAZ-3 shall be retained in the project file. A copy of the Vector Control Plan shall be placed in the project file. Verification of implementation shall be based on field inspections by the vector control district with jurisdiction over a project site. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Vector Control District with Jurisdiction	

Mitigation Measure	Implementation Schedule	Verification	Source
Wildland Fire HAZ-5 Prior to approval of new facilities (recharge basins, new production wells, pipeline interconnects and related facilities) that would be located in areas designated as Fire Hazard Severity Zones by CAL FIRE, a site-specific Fire Management Plan shall be developed that identifies fire hazard reduction measures to be implemented during construction. These measures shall address all staging areas, welding areas, or areas slated for development that are planned to use spark-producing equipment. These areas shall be cleared of dried vegetation or other material that could ignite. Any construction equipment that includes a spark arrestor shall be equipped with a spark arrestor in good working order. During the construction of the project facilities, all vehicles and crews working at the project site to have access to functional fire extinguishers at all times. In addition, construction crews shall have a spotter during welding activities to look out for potentially dangerous situations, including accidental sparks. A Fire Management Plan shall also be implemented at those sites where maintenance activities may be similar to construction activities.	Prior to approval of new facilities (recharge basins, new production wells, pipeline interconnects and related facilities) that would be located in areas designated as Fire Hazard Severity Zones by CAL FIRE. The Fire Management Plan shall be implemented during all stages of construction.	A copy of the construction contract including MM HAZ-5 shall be retained in the project file. A copy of the Fire Management Plan shall be placed in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Wildland Fire HAZ-6 Prior to commencement of maintenance activities during long term operation of facilities located in Fire Hazard Severity Zones, the Watermaster Party conducting operations/maintenance (e.g., spreading ground desilting and vegetation removal, maintenance of well sites, etc.) shall ensure that a Fire Management Plan shall be included in the maintenance plans for each facility.	Prior to commencement of maintenance activities that would be similar to construction activities, the Fire Management Plan shall be modified (if necessary) and implemented during maintenance activities that would be similar to construction activities (e.g., vegetation removal, basin desilting).	A copy of the construction contract including MM HAZ-6 shall be retained in the project file. A copy of the Fire Management Plan shall be placed in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Hazards and Hazardous Materials / Airport Safety / Wildfire Hazards Emergency Planning Refer to mitigation measures TR-1, TR-2 and TR-3			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Hydrology / Water Quality			
HWQ-2 <u>Implementation of a SWPPP and the Use of BMPs During Construction</u>. Prior to commencement of any ground disturbing activities on a project site, the Watermaster Party or construction contractor shall prepare a SWPPP (area of disturbance one acre or greater) and submit a Notice of Intent to the State Water Resources Board. Implementation of BMPs as outlined in the SWPPP shall be on-going during construction activities. A copy of the SWPPP and the Waste Discharge Identification number, shall be kept at the construction and available for review by inspectors until construction is completed. For sites where the area of disturbance would be less than one acre, the project proponent or construction contractor is still responsible for maintaining the site and must provide the city in which construction activities will take place, with a list of BMPs and a schedule for completion of such activities, prior to commencement of construction activities.	MM HWQ-2 shall be included in the construction contract as a contract specification. Project Engineer or Construction Contractor shall submit a Notice of Intent (NOI) to the State Water Resources Control Board to receive a Waste Discharge Identification Number (WDID). Provide a copy of the site-specific SWPPP and WDID to the Implementing Agency.	A copy of the construction contract including MM HWQ-2 shall be retained in the project file. A copy of the SWPPP and NOI shall be provided to the Implementing Agency. A copy of the SWPPP and NOI shall be kept at the construction site for review during site inspections by the Implementing Agency.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Hydrology / Water Quality HWQ-3 <u>Implementation of a Drainage Plan to Reduce Downstream Flows</u>. Prior to construction of project facilities, the Watermaster Party proposing a project shall prepare a drainage plan that includes design features to reduce stormwater peak concentration flows exiting the above ground facility sites so that the capacities of the existing downstream drainage facilities are not exceeded. These design features could include bioretention, sand infiltration, return of stormwater for treatment within the treatment plant, and/or detention facilities.	MM HWQ-3 shall be included in the construction contract as a contract specification. The Drainage Plan shall be completed prior to commencement of ground disturbance and shall show how post-construction site drainage would be controlled.	A copy of the construction contract including MM HWQ-3 shall be retained in the project file. A copy of the Drainage Plan shall be submitted to the Implementing Agency prior to commencement of ground disturbance for review and approval. A copy of the Drainage Plan shall be kept in the file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Land Use / Planning No mitigation measures			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**

Mitigation Measure	Implementation Schedule	Verification	Source
Noise <u>Construction</u> NOI-1 The following mitigation measures are required to reduce noise and vibration levels produced by the construction equipment at nearby, occupied sensitive receiver locations: • A focused construction noise and vibration mitigation plan shall be required if any or both of the following screening criteria are met: o If project construction activities would occur within 100 feet of occupied, sensitive receiver locations (e.g., residential, school, etc. uses): - A focused construction noise mitigation plan shall be required which evaluates whether project construction noise levels would exceed the 65 dBA Leq exterior noise level limit at occupied sensitive receiver locations, and the mitigation measures (if any) necessary to satisfy the 65 dBA Leq exterior noise level limit. - Potential mitigation measures to reduce project construction noise levels include, but are not limited to, temporary noise barriers, the use of alternative equipment, noise level monitoring, temporary relocation of residents, or a combination of the above.	MM NOI-1 shall be included in the construction contract as a contract specification. Prior to commencement of construction activities, a focused Construction Noise and Vibration Mitigation Plan shall be prepared if screening criteria for noise generating construction activities in excess of local Noise Standards are met. Implementation of the Construction Noise and Vibration Mitigation Plan (if required) shall be implemented throughout the construction period when screening criteria are met.	A copy of the construction contract including MM NOI-1 shall be placed in the project file. A copy of the Construction Noise and Vibration Mitigation Plan (if required) shall be placed in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Noise <u>Construction</u> NOI-2 During all project site construction, the construction contractors shall ensure that all construction equipment, fixed or mobile, shall have properly operating and maintained mufflers, consistent with manufacturers' standards.	MM NOI-2 shall be included in the construction contract as a contract specification. Prior to commencement of construction activities, the construction contractor shall provide the Implementing Agency with a list of construction equipment and vehicles and verify that all equipment and vehicles are in good operational condition per manufacturers standards.	A copy of the construction contract including MM NOI-2 shall be placed in the project file. A copy of the equipment/vehicle list shall be placed in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Noise <u>Construction</u> NOI-3 The construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receivers nearest the project site during all project construction (i.e., the center of each site).	MM NOI-2 shall be included in the construction contract as a contract specification. Prior to commencement of construction activities, the construction contractor shall provide the Implementing Agency with a site plan showing where staging areas will be located during construction to ensure that all stationary construction equipment that emit noise, is directed away from the noise-sensitive receivers nearest the project site.	A copy of the construction contract including MM NOI-2 shall be placed in the project file. A copy of the Site Plan showing the location of the staging area shall be placed in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Noise <u>Construction</u> NOI-4 Prior to commencement of construction activities, the construction contractor shall design delivery routes of equipment and materials to minimize the exposure of sensitive land uses or residential dwellings to delivery truck-related noise. A map of delivery routes shall be provided to vendors making deliveries of equipment and materials.	MM NOI-4 shall be included in the construction contract as a contract specification. Prior to commencement of construction activities, the construction contractor shall provide the Implementing Agency with a map showing delivery routes. All vendors making deliveries of equipment and materials shall be provided with a copy of the map of delivery routes.	A copy of the construction contract including MM NOI-4 shall be placed in the project file. A copy of the delivery route map showing the location of the staging area shall be placed in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency Correspondence documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Noise <u>Construction</u> NOI-5 If high vibration-generating project construction activities such as well drilling equipment, heavy mobile equipment (greater than 80,000 pounds), or large loaded trucks would be used: • Within 25 feet of occupied, sensitive receiver locations in the cities of Claremont, Pomona, La Verne, and Upland; or • Within 50 feet of occupied, sensitive receiver locations in unincorporated County of Los Angeles: o A focused construction vibration mitigation plan shall be required which evaluates whether project construction vibration levels would exceed the exterior vibration level limit at occupied sensitive receiver locations, specific to that jurisdiction's standards, and the mitigation measures (if any) necessary to satisfy the exterior vibration level limit. - Potential mitigation measures to reduce project construction vibration levels include, but are not limited to, the use of alternative equipment, vibration level monitoring, temporary relocation of residents, or a combination of the above.	MM NOI-5 shall be included in the construction contract as a contract specification. Prior to commencement of construction activities, a focused Construction Vibration Mitigation Plan shall be prepared and submitted to the Implementing Agency for review and approval if either of the two distance criteria identified in the measure are met. The Construction Vibration Mitigation Plan shall be implemented throughout the construction schedule or until such time as the high-vibration activities cease.	A copy of the construction contract including MM NOI-5 shall be placed in the project file. A copy of the approved Construction Vibration Mitigation Plan shall be placed in the project file. Verification of implementation shall be through reporting by the construction contractor to the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Noise Operation NOI-6 Prior to approval of a project, the following operational noise abatement measures shall be incorporated into the design of new facilities to further reduce the potential operational noise levels received at nearby sensitive receiver locations: • New, or existing unenclosed, well pumps shall be enclosed to further reduce operational noise levels at nearby sensitive receiver locations (e.g., residential homes). The location of any louvres or openings in the enclosure assembly would reduce the overall noise reduction of the enclosure, and therefore, shall be oriented away from nearby residential homes, if feasible. In addition, acoustically-rated louvres and materials within the enclosure construction are recommended to further reduce the noise levels at the well pump source. • All trucks transiting on-site in outdoor areas of the project facilities should be operated with properly functioning and well-maintained mufflers. • Maintain quality pavement conditions on the property that are free of vertical deflection (i.e., speed bumps) to minimize truck noise. • Truck access gates and loading areas should have posted signs which state: 1. Truck drivers shall turn off engines when not in use; 2. No music or electronically reinforced speech from workers should be audible at noise-sensitive properties.	MM NOI-6 shall be included in the construction contract as a contract specification. Prior to approval of a project, the Site Plan showing how operational noise abatement measures shall be incorporated into the design of new facilities. The Site Plan shall be reviewed and approved by the Implementing Agency. During long-term operation of a project, if changes to the approved operational noise abatement measures, such changes shall be submitted to the Implementing Agency for review and approval.	A copy of the construction contract including MM NOI-6 shall be placed in the project file. A copy of the approved Site Plan shall be placed in the project file. Verification of implementation during construction shall be through reporting by the construction contractor to the Implementing Agency. Field notes documenting verification shall be retained in the project file. Verification of approved changes to the operation of a facility shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Three Valley MWD	

Mitigation Measure	Implementation Schedule	Verification	Source
Population / Housing No mitigation measures			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**

Mitigation Measure	Implementation Schedule	Verification	Source
Public Services and Recreation <u>Emergency Planning and Traffic Control</u> Refer to mitigation measures TR-1, TR-2, TR-3			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Public Services and Recreation <u>Wildland Fire</u> Refer to mitigation measures HAZ-5 and HAZ-6			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Transportation TR-1 Prior to initiating construction of proposed facilities, the Watermaster Party proposing a project or the designated construction contractor, shall prepare and implement a Construction Traffic Management Plan that contains comprehensive strategies for maintaining emergency access on public streets. In general, the Construction Traffic Management Plan shall ensure that to the extent practical, construction traffic would access a project site during off-peak hours or limited access during the peak hours; and that construction traffic would be routed to avoid travel through, or proximate to, sensitive land uses. The Plan shall also include, where necessary, the use of flags, signs and lights, as well as flag persons to direct traffic. Where a project includes new pipelines to connect wells to treatment facilities or to connect the Pomona WTP to the new SASG recharge basin, strategies shall include, but are not limited to, maintaining steel trench plates on public streets to restore access across open trenches and identification of alternate routing around construction zones. Police, fire, and other emergency service providers shall be notified of the timing, location, and duration of the construction activities and the location of detours and lane closures. The Watermaster Party proposing a project, or designated construction contractor shall ensure that the Construction Traffic Management Plan and other construction activities are consistent with the Emergency Response Plan of the jurisdiction in which the project is being constructed	MM TR-1 shall be included in the construction contract as a contract specification. Prior to initiating construction of proposed facilities, the Watermaster Party proposing a project or the designated construction contractor, shall prepare and implement a Construction Traffic Management Plan. Watermaster Party proposing a project, or designated construction contractor shall ensure that the Construction Traffic Management Plan and other construction activities are consistent with the Emergency Response Plan of the jurisdiction in which the project is being constructed.	A copy of the construction contract including MM TR-1 shall be retained in the project file. A copy of the Construction Traffic Management Plan shall be placed in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Transportation TR-2 As part of the Construction Traffic Management Plan, it shall be stipulated that the delivery and removal of heavy equipment shall be conducted during off- peak hours to minimize the heavy truck activity during the morning and evening peak periods (7 to 9 am and 4 to 6 pm) in order to have nominal impacts to traffic and circulation near the vicinity of a project.	See Implementation Schedule for MM TR-1.	See Verification notes in MM NOI-1.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Transportation TR-3 During the site grading, where export of material is required, the construction contractor shall limit export activity between the hours of 7 to 9 am (morning peak period) and 4 to 6 pm (evening peak period) to fewer than the equivalent of 50 passenger car equivalent (PCE) truck trips per hour. 50 PCE truck trips equates to approxi-mately 16 total trucks (8 trucks in and 8 trucks out) during the peak periods specified above in order to limit the potential impacts of haul truck activity during these busy commute times: *50 PCE truck trips / 3.0 PCE factor = 16 total trucks during the peak hour*	See Implementation Schedule for MM TR-1.	See Verification notes in MM NOI-1.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Utilities / Service Systems / Energy			
USS-1 <u>Implementation of a Drainage Plan to Reduce Downstream Flows</u>. Prior to construction of project facilities, the Watermaster Party proposing a project shall prepare a drainage plan that includes design features to reduce storm-water peak concentration flows exiting the above ground facility sites so that the capacities of the existing downstream drainage facilities are not exceeded. These design features could include bioretention, sand infiltration, return of stormwater for treatment within the treatment plant, and/or detention facilities.	MM USS-1 shall be included in the construction contract as a contract specification. The Drainage Plan shall be completed prior to commencement of ground disturbance and shall show how post-construction site drainage would be controlled.	A copy of the construction contract including MM USS-1 shall be retained in the project file. A copy of the Drainage Plan shall be submitted to the Implementing Agency prior to commencement of ground disturbance for review and approval. A copy of the Drainage Plan shall be kept in the file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Utilities / Service Systems / Energy			
USS-2 <u>Implementation of a Construction and Demolition Disposal Plan</u>. Prior to commencement of construction, the contractor shall prepare a Construction and Demolition C&D) disposal plan for review and approval by the local jurisdiction where construction will occur. Per CGBC Section 45.408.1.1, *Construction Waste Management Plan*, the C&D Disposal Plan shall include the following elements: 1. Identifies the construction and demolition waste materials to be diverted from disposal by efficient usage, recycling, reuse on the project or salvage for future use or sale. 2. Determines if construction and demolition waste materials will be sorted on-site (source-separated) or bulk mixed (single stream). 3. Identifies diversion facilities where construction and demolition waste material collected will be taken. 4. Specifies that the amount of construction and demolition waste materials diverted shall be calculated by weight or volume, but not by both.	MM USS-2 shall be included in the construction contract as a contract specification. The Construction and Demolition Disposal Plan shall be completed prior to commencement of construction and be implemented throughout construction activities.	A copy of the construction contract including MM USS-2 shall be retained in the project file. A copy of the Construction and Demolition Disposal Plan shall be submitted to the Implementing Agency prior to commencement of ground disturbance for review and approval. A copy of the Construction and Demolition Disposal Plan shall be kept in the file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Aesthetics Facilities and Landscaping AES-1 Proposed facilities, including walls, gates, treatment facilities, etc., shall be designed in accordance with local design standards in order to be complementary to the local area. Landscaping shall be installed and maintained in conformance with local landscaping design guidelines as appropriate to screen views of new facilities from surrounding areas to the extent feasible taking into consideration the needs of the project and except where such compliance is not required by California law.	AES-1 shall be incorporated into individual project design specifications, which shall be included in the construction contract as a contract specification and implemented by the contractor during construction.	A copy of the construction contract including MM AES-1 shall be retained in the project file(s). Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft Program Environmental Impact Report (Draft PEIR)
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer/Architect Construction Contractor	Implementing Agency[1]	

Mitigation Measure	Implementation Schedule	Verification	Source
Aesthetics Light and Glare AES-2 To avoid any light intrusion to surrounding land uses, on project sites where permanent exterior lighting is proposed, lights shall be shielded and directed downward and toward the interior of a site. The maximum light allowed beyond the property boundary adjacent to sensitive light receptors shall be as stipulated in local design guidelines or development code and except where such compliance is not required by California law.	AES-2 shall be incorporated into individual project design specifications, which shall be included in the construction contract as a contract specification and implemented by the contractor during construction.	A copy of the construction contract including MM AES-2 shall be retained in the project file(s). Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Architect Construction Contractor	Implementing Agency	

[1] "Implementing Agency" as used throughout this Mitigation Monitoring and Reporting Program refers to the lead agency implementing a project under the Six Basins Strategic Plan (e.g., Three Valleys Municipal Water District (TVMWD), City of Pomona, City of La Verne, Six Basins Watermaster (Watermaster), or other Watermaster Parties).

Mitigation Measure	Implementation Schedule	Verification	Source
Aesthetics Light and Glare AES-3 Development of Strategic Plan projects shall comply with existing or future lighting ordinances, and except where such compliance is not required by California law.	AES-3 shall be incorporated into individual project design specifications, which shall be included in the construction contract as a contract specification and implemented by the contractor during construction.	A copy of the construction contract including MM AES-3 shall be retained in the project file(s). Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Architect Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Aesthetics Light and Glare AES-4 Any new structures that may require large facades shall not be constructed using highly reflective building materials.	AES-4 shall be incorporated into individual project design specifications, which shall be included in the construction contract as a contract specification and implemented by the contractor during construction.	A copy of the construction contract including MM AES-4 shall be retained in the project file(s). Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Architect Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Agriculture and Forestry Resources – No mitigation measures			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**

Mitigation Measure	Implementation Schedule	Verification	Source
Air Quality / Greenhouse Gas Emissions / Global Climate Change AQ-1 Construction contractors at each project site shall adhere to applicable measures contained in Table 1 of Rule 403 including, but not limited to: • All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions. • The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the mid-morning, afternoon, and after work is done for the day. • The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are limited to 15 miles per hour or less.	MM AQ-1 shall be implemented during construction of future facilities at existing sites identified in Project Category 3 and shall be included in the construction contract as a contract specification.	A copy of the construction contract including MM-AQ-1 shall be retained in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes from inspections shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Air Quality / Greenhouse Gas Emissions / Global Climate Change AQ-2 Regarding emissions of NOx and VOC, when using construction equipment greater than 150 horsepower (>150 HP), the Construction Contractor shall ensure that off-road diesel construction equipment complies with EPA/CARB Tier 4 emissions standards or equivalent and shall ensure that all construction equipment is tuned and maintained in accordance with the manufacturer's specifications.	MM AQ-2 shall be implemented during construction of future facilities at existing sites identified in Project Category 3 and shall be included in the construction contract as a contract specification.	A copy of the construction contract including MM-AQ-2 shall be retained in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes from inspections shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Air Quality / Greenhouse Gas Emissions / Global Climate Change AQ-3 SCAQMD Rule 403-Table 1 (see attached) lists a number of Best Available Control Technologies (BACT) that may apply to the construction of Strategic Plan projects. On a project-by-project basis, SCAQMD Rule 403 Table 1 shall be reviewed and appropriate measures incorporated into a project specific monitoring program.	MM AQ-3 shall be implemented during construction of future facilities at existing sites identified in Project Category 3 and shall be included in the construction contract as a contract specification.	A copy of the construction contract including MM-AQ-3 shall be retained in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes from inspections shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Biological Resources			
BIO-1a *Tree Removal*. Prior to the trimming or removal of a tree at any project site, the Watermaster Party proposing the project will coordinate with the local agency to determine if the particular trees targeted for trimming or removal are heritage trees regulated by local agency. If the targeted tree is a heritage under the City or County Regulations, the appropriated application will be submitted and approved by the local agency prior to conducting the trimming or removal of the heritage tree(s), except where compliance is not required by California law.	If tree removal or trimming is identified, MM BIO-1 shall be incorporated into individual project design specifications, which shall be included in the construction contract as a contract specification and implemented by the contractor during construction.	A copy of the construction contract including MM BIO-1 shall be retained in the project file(s). Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Biological Resources BIO-1b *Removal of Native Trees*. Prior to commencement of ground disturbing activities where native trees may require trimming or removal), and to address the potential spread of invasive pests and diseases by implementing the following: 1) Prior to tree trimming or removal, a certified arborist shall evaluate trees for infectious tree diseases including but not limited to: sudden oak death (*Phytophthora ramorum*), thousand canker fungus (*Geosmithia morbida*), polyphagous shot hole borer (*Euwallacea* spp.), and goldspotted oak borer (*Agrilus auroguttatus*) (TCD 2021; UCANR 2021; Phytosphere Research 2012; UCIPM 2013). 2) If a certified arborist determines trees are impacted by infectious pests or diseases, the certified arborist shall prepare an *Infectious Tree Disease Management Plan* or develop a detailed, robust, enforceable, and feasible list of preventative measures. A plan/list shall provide measures relevant for each tree pest or disease observed. To avoid the spread of infectious tree pests and diseases, infected trees should not be transported from a project area without first being treated using best available management practices described in the *Infectious Tree Disease Management Plan* or list of preventative measures. 3) If possible, all tree material, especially infected tree material, shall be left on site. The material could be chipped for use as ground cover or mulch. Pruning and power tools should be cleaned and disinfected before use to prevent introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas.	MM BIO-1b shall be included in the construction contract as a contract specification. Prior to tree trimming or removal, a certified arborist shall evaluate trees for infectious tree diseases. If a certified arborist determines trees are impacted by infectious pests or diseases, the certified arborist shall prepare an *Infectious Tree Disease Management Plan* or develop a detailed, robust, enforceable, and feasible list of preventative measures. I If possible, all tree material, especially infected tree material, shall be left on site. The material could be chipped for use as ground cover or mulch. Pruning and power tools should be cleaned and disinfected before use to prevent introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas.	A copy of the construction contract including MM BIO-1 shall be retained in the project file(s). Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Biological Resources			
BIO-2 *Nesting Birds*. Removal of any trees, shrubs, or any other potential nesting habitat shall be conducted outside the avian nesting season, as verified by a qualified Avian Biologist. The nesting season generally extends from February 1 through August 31, but it can vary slightly from year to year based on seasonal weather conditions. If ground disturbance and vegetation removal cannot occur outside of the qualified Avian Biologist's-verified nesting season, a pre-construction clearance survey for nesting birds shall be conducted within 30 days of the start of any construction. If no active nests are found, no further action would be required. If an active nest is found, the biologist shall set appropriate no-work buffers around the nest, which would be determined based on the nesting species, its sensitivity to disturbance, nesting stage and expected types, intensity and duration of disturbance. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved no-work buffer zone shall be clearly marked in the field, within which no disturbance activity shall commence until the qualified biologist has determined the young birds have successfully fledged and the nest is inactive.	MM BIO-2 shall be included in the construction contract as a contract specification. The preconstruction survey(s) shall be conducted prior to commencement of site disturbing activities. If an active bird nest is located, a qualified biologist shall prepare and implement a monitoring program to monitor the buffer area weekly where no construction activities shall occur until such time as the project biologist determines fledglings have left the nest.	A copy of the construction contract including MM BIO-2 shall be retained in the project file(s). A copy of the survey(s) shall be placed in the project file (if applicable). Verification of implementation shall be based on field notes provided by the biological monitor to the Implementing Agency. Field notes shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Project Biologist	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Biological Resources BIO-3 *Additional Biological Resources Assessments*. Prior to the approval of future projects on sites not identified in this EIR and occurring within an undeveloped area, or sites within the SASG or TCSG where new recharge basins and related infrastructure are proposed, a biological assessment shall be made of the selected or potential sites to determine if sensitive biological resources (sensitive plant community, sensitive species, jurisdiction waters) are present. If a sensitive biological resource is present, an analysis will be made of the potential for impact to the resource, an appropriate mitigation strategy will be developed and submitted to the wildlife and regulatory agencies with authority to review and approve the mitigation strategy as reducing impacts to less than significant. Either appropriate avoidance ~~and~~ or minimization measures will be developed to offset any potential impact or offsite mitigation shall be provided to offset the impact. Where a species is State-listed, CDFW would require full mitigation under an Incidental Take Permit. At a minimum, the mitigation strategy shall (1) identify the affected SSC; (2) identify strategies for handling and relocation of individuals per CDFW guidance, and (3) identify compensatory mitigation for temporary or permanent loss of habitat that supports SSC (ratio to be determined in consultation with CDFW) and/or through acquisition of an Incidental Take Permit if a state listed or candidate species is determined to be present.	The Biological Resources Assessment shall be completed prior to commencement of any ground disturbing activities. Consultation with regulatory agencies (e.g., CDFW, ACOE) shall be completed prior to commencement of any ground disturbing activities.	A copy of the construction contract including MM BIO-2 shall be retained in the project file(s). MM BIO-3 shall be completed prior to approval of a project. If consultation with CDFW is required, the 2081 permit or Streambed Alteration agreement shall be provided to the construction contractor for implementation of measures required by the permit or agreement.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Biological Resources			
BIO-4 *Wetland Permits or Streambed Alteration Agreement*. Prior to approval of a project where permanent impacts in areas determined to be potential jurisdictional wetlands or riparian features, Waters of the State or Waters of the U.S., the Watermaster Party undertaking a project shall consult with the regulatory agencies (USACE, RWQCB and CDFW) to determine if a CWA 404 permit, CWA 401 or a Streambed Alternation Agreement under Fish and Game Code 1602 are required prior to development. Based on a notification pursuant to Fish and Game Code section 1602 and other information, CDFW will determine whether a Lake and Streambed Alteration (LSA) Agreement is required prior to conducting proposed activities. An LSA Notification shall include the following: 1) an analysis to demonstrate that concrete-lined or soft-bottom channels would not be impaired (e.g., aggraded, incised, increased suspended sediment), 2) a hydrological evaluation of the 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions, 3) whether dewatering/diversion of water may be necessary, and (if applicable) 4), an analysis of whether diversion structures would impact stormwater and dry season water flow, and the extent of those impacts, during the wet season (November through March), dry season (April through October), and both above-average and below-average water year. a) On- or offsite replacement of USACE / RWQCB jurisdictional waters of the U.S. and/or waters of the State at a ratio no less than 1:1 for permanent impacts and to restore the site to pre-project conditions for temporary impacts. Offsite replacement may include the purchase of mitigation credits at an agency-approved offsite mitigation bank or in-lieu fee program.	MM BIO-4 shall be included in the construction contract as a contract specification. Consultation with regulatory agencies ((USACE, RWQCB and CDFW) shall be completed prior to approval of the recharge project proposed to be undertaken. Replacement habitat or the purchase of mitigation credits in an existing mitigation bank shall be determined as part of the consultation. Timing of the development of replacement habitat on-site shall be determined during consultation.	A copy of the construction contract including MM BIO-2 shall be retained in the project file(s). MM BIO-3 shall be completed prior to approval of a project. If consultation with CDFW is required, the 2081 permit or Streambed Alteration agreement shall be provided to the construction contractor for implementation of measures required by the permit or agreement.	Draft PEIR

Mitigation Measure	Implementation Schedule	Verification	Source
b) On- or offsite replacement of CDFW jurisdictional streambed and associated riparian habitat shall occur at a ratio no less than 2:1 for permanent impacts and to restore the site to pre-project conditions for temporary impacts. Offsite replacement may include the purchase of mitigation credits at an agency-approved offsite mitigation bank or in-lieu fee program.			
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Cultural Resources / Tribal Cultural Resources			
CUL-1 Prior to approval of a project identified under Project Categories 1 through 3, the Watermaster Party proposing the project shall retain a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology to conduct an assessment of the project site and vicinity for all project elements that involve ground disturbance. The archaeologist shall conduct cultural resources assessment consisting of: (1) a cultural resources records search to be conducted at the South Central Coastal Information Center located at California State University Fullerton; (2) consultation with the Native American Heritage Commission (NAHC) and with interested Native American tribes identified by NAHC; (3) a field survey by the archaeologist; and (4) recordation of all identified archaeological resources located on a project site on California Department of Parks and Recreation 523 Site Record forms. The archaeologist shall provide recommendations regarding resource significance and additional work for those resources that may be affected by a project.	MM CUL-1 shall be included in the construction contract as a contract specification. The Cultural Resources Assessment (CRA) (if required) shall be completed prior to approval of a project by the Implementing Agency. Should the CRA determine that resources may be uncovered during construction, an Archaeological monitor shall prepare and implement a monitoring program. The Implementing Agency shall be notified within 24-hours of any accidental exposure of subsurface cultural resources. After a determination is made and the significance of the find determined, the management recommendations shall be implemented and documented.	A copy of the construction contract including MM CUL-1 shall be retained in the project file(s). A copy of the Cultural Resources Assessment and Monitoring Program (if applicable) shall be placed in the project file. A copy of the construction contract shall be retained in the project file. A final report of findings shall be submitted to the Implementing Agency for retention. Field notes from Archaeological monitor shall be retained in the project file.	Draft PEIR

Responsible Party	Monitoring Party	Status / Date / Initials
Project Engineer Project Archaeologist	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Cultural Resources / Tribal Cultural Resources			
CUL-2 Prior to ground disturbance activities at a project site that contain structures 45 years old or older, affected structure(s) shall be subject to a historic built environment survey, and potentially historic structures shall be evaluated for their potential historic significance, prior to a Watermaster Party's finalization of design/site plans. The survey shall be carried out by a qualified historian or architectural historian meeting the Secretary of the Interior's Standards for Architectural History. If potentially significant resources are encountered during the survey, a treatment plan shall be prepared prior to demolition or substantial alteration of such resources identified.	MM CUL-2 shall be included in the construction contract as a contract specification. Prior to demolition or substantial alteration of a potential historic building, a qualified architectural historian shall conduct a Historic Built Environment Survey. If a resource is identified, a treatment plan shall be prepared.	A copy of the construction contract including MM CUL-2 shall be retained in the project file. A copy of the Historic Built Environment Survey Cultural Resources Assessment and Monitoring Program (if applicable) shall be placed in the project file.	Draft PEIR

Responsible Party	Monitoring Party	Status / Date / Initials
Project Engineer Architectural Historian	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Cultural Resources / Tribal Cultural Resources			
CUL-3 In the event that human remains are uncovered at a project site, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until: • The coroner of the county in which the remains are discovered must be contacted to determine whether an investigation of the cause of death is required, and • If the coroner determines the remains to be Native American: ○ The coroner shall contact the Native American Heritage Commission within 24 hours.	MM CUL-3 shall be included in the construction contract as a contract specification. During ground disturbing activities and in the event that human remains are uncovered at a project site the coroner shall be called to determine whether an investigation is required Disposition of any remains identified as Native American shall be determined through consultation with the MLD.	A copy of the construction contract including MM CUL-3 shall be retained in the project file. Excavation or disturbance shall cease and the coroner of the county in which the remains are discovered must be contacted. If the remains are Native American. disposition of the remains shall be by agreement between the coroner and the most likely descendent.	Draft PEIR

Mitigation Measure	Implementation Schedule	Verification	Source
Cultural Resources / Tribal Cultural Resources CUL-3 (cont.) ○ The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American. ○ The most likely descendent (MLD) may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98. • Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance: ○ The Native American Heritage Commission is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 24 hours after being notified by the commission. ○ The descendant identified fails to make a recommendation; or ○ The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.			
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Cultural Resources / Tribal Cultural Resources			
CUL-4 Prior to approval of a project, the lead agency with authority to approve the project. shall conduct AB 52 consultation with Native American tribes based on a list provided by the NAHC. If the lead agency determines that a project may cause a substantial adverse change to a tribal cultural resource, identified through project-specific AB 52 consultation, and measures are not otherwise identified in the consultation process required under PRC Section 21080.3.2, the Watermaster Party undertaking the project shall implement the following measures where feasible and necessary to address site specific impacts to avoid or minimize the significant adverse impacts: • Avoidance and preservation of the resources in place, including, but not limited to: planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria. • Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: o Protecting the cultural character and integrity of the resource; o Protecting the traditional use of the resource; or o Protecting the confidentiality of the resource • Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places. • Protecting the resource.	Prior to approval of a project, the Implementing Agency with authority to approve the project. shall conduct AB 52 consultation with Native American tribes based on a list provided by the NAHC. See MM CUL-1 for requirements for the preparation of a Cultural Resources Assessment. If Cultural Resources are uncovered, further consultation with NAHC and the Native American tribe consulting on the project shall be undertaken to determine how to avoid or minimize impacts including avoidance/ preservation in place and a permanent conservation easement. Site specific impacts to Cultural Resources shall be addressed prior to returning to the area where the resources were uncovered to continue construction.	A copy of the construction contract including MM CUL-4 shall be retained in the project file. A copy of the construction contract shall be retained in the project file. Excavation or disturbance of cultural resources shall cease until the Project Archaeologist determines the significance of the find. A final report of findings shall be submitted to the City for retention. Field notes from Archaeologist shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Environmental Justice Refer to mitigation measures AQ-1 and AQ-2			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Environmental Justice <u>Hazards / Emissions</u> Refer to mitigation measure HAZ-1			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Environmental Justice <u>Construction Traffic Management Plan</u> Refer to mitigation measures TR-1, TR-2 and TR-3			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Geology / Soils / Paleontological Resources / Mineral Resources <u>Geology and Soils</u> GEO-1 Should a project in any of the categories of projects be located within a designated Alquist-Priolo Fault Zone, the project proponent shall consider relocating the project to another site. If that is not feasible, then the project shall be designed in accordance with the most current version of the CBC and subject to a project specific Geotechnical Investigation.	The design level geotechnical investigation shall be completed prior to completion of facility design. The measures identified in the geotechnical investigation shall be incorporated into individual project design specifications. Site specific design criteria shall be included in the construction contract as contract specifications.	A copy of the geotechnical investigation shall be retained in the project file(s). A copy of the construction contract including this geology/soils mitigation measure shall be retained in the project file(s). Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Geology / Soils / Paleontological Resources / Mineral Resources <u>Geology and Soils</u> GEO-2 Prior to approval of a project, a design-level geotechnical investigation shall be completed by the Watermaster Party proposing the project. The investigation shall identify all potential seismic hazards including fault rupture, and characterize the soil profiles, including liquefaction potential, expansive soil potential, and potential for subsidence to occur. The geotechnical investigation shall recommend site-specific design criteria to mitigate for seismic and non-seismic hazards, such as special foundations and structural setbacks, and these recommendations shall be incorporated into the design of individual projects.	The design level geotechnical investigation shall be completed prior to completion of facility design. The measures identified in the geotechnical investigation shall be incorporated into individual project design specifications. Site specific design criteria shall be included in the construction contract as contract specifications.	A copy of the geotechnical investigation shall be retained in the project file(s). A copy of the construction contract including this geology/soils mitigation measure shall be retained in the project file(s). Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Project Geologist Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Geology / Soils / Paleontological Resources / Mineral Resources <u>Paleontological Resources</u> GEO-3 For project-level development involving ground disturbance, prior to commencement of ground disturbance a qualified paleontologist shall be retained to determine the necessity of conducting a study of the project area(s) based on the potential sensitivity of the project site for paleontological resources. If deemed necessary, the paleontologist shall conduct a paleontological resources inventory designed to identify potentially significant resources. The paleontological resources inventory would consist of: a paleontological resource records search to be conducted at the San Bernardino County Museum and/or other appropriate facilities; a field survey or monitoring where deemed appropriate by the paleontologist; and recordation of all identified paleontological resources.	MM GEOL-3 shall be included in the construction contract as a contract specification. Prior to commencement of ground disturbance, a qualified paleontologist shall be retained to determine the necessity of conducting a study of the project area(s) based on the potential sensitivity of the project site for paleontological resources. If required, prior to commencement of ground disturbing activities, a qualified paleontologist shall conduct a paleontological resources inventory of a project site.	A copy of the construction contract including MM GEO-3 shall be retained in the project file. A copy of the paleontological resources inventory (if prepared) shall be placed in the project file. If a monitor is required, field notes from the Paleontological monitor shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Project Paleontologist	Three Valley MWD	

Mitigation Measure	Implementation Schedule	Verification	Source
Hazards and Hazardous Materials / Airport Safety / Wildfire Hazards Hazards / Emissions HAZ-1 Permits. Prior to installation of new or relocated equipment, or prior to modification of any existing equipment, the Watermaster Party responsible proposing the project where treatment facilities are located, or a diesel operated back-up generator is proposed, shall obtain a Permit to Construct from SCAQMD. Once a piece of equipment is installed, modified and/or operated, SCAQMD will process the application for a Permit to Operate.	MM HAZ-1 shall be included in the construction contract as a contract specification. Prior to installation of new or relocated equipment, or prior to modification of any existing equipment, obtain a Permit to Construct and Permit to Operate from SCAQMD.	A copy of the construction contract including MM HAZ-1 shall be retained in the project file. A copy of the SCAQMD permits shall be placed in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Hazards and Hazardous Materials / Airport Safety / Wildfire Hazards <u>Contamination</u> HAZ-3 Prior to the commencement of any construction that would require ground-disturbing activities, a project proponent shall undertake a Phase I Environmental Site Assessments (ESA) to determine the presence/absence of soil and/or groundwater contamination at or in the vicinity of a project site. Recommendations identified in the ESA shall be implemented to the satisfaction of applicable agencies prior to and during construction. If the Phase I ESA finds the potential for hazardous concentrations of contaminated soil or groundwater to occur within the project site, a Phase II ESA shall be completed before construction begins. If the Phase II ESA determines that the site has contaminated soil and/or groundwater, a Soil and Groundwater Management Plan that specifies the method for handling and disposing of contaminated soil and groundwater prior to demolition, excavation, and construction activities shall be prepared and implemented. A Phase II ESA shall include soil and/or groundwater sampling and analysis for anticipated contaminants. Such sampling is intended to identify how contaminated soil and/or groundwater shall be disposed of, and to determine if construction workers would need special personal protective gear and/or equipment.	Prior to the commencement of any construction that would require ground-disturbing activities. If the Phase I ESA finds the potential for hazardous concentrations of contaminated soil or groundwater to occur within the project site, a Phase II ESA shall be completed before construction begins. If the Phase II ESA determines that the site has contaminated soil and/or groundwater, a Soil and Groundwater Management Plan shall be prepared and implemented before construction begins.	A copy of the construction contract including MM HAZ-3 shall be retained in the project file. A copy of the Phase I ESA shall be retained in the project file. A copy of the Phase II ESA shall be retained in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Hazards and Hazardous Materials / Airport Safety / Wildfire Hazards <u>Airport Safety</u> HAZ-4 For future projects that may be developed on sites within an airport safety zone, the Watermaster Party responsible for project development shall comply with the guidelines of the appropriate Airport Land Use Compatibility Plan (ALUCP). Project design plans for sites within an ALUCP shall be submitted to the appropriate Airport Management agencies for review and comment prior to implementation.	Prior to approval of a project on a site within an ALUCP the Watermaster Party shall submit project design plans to the appropriate Airport Management Agency Airport Management Agency shall sign off on the project design plans prior to approval of the project by the Implementing Agency.	Watermaster Party project engineer or architect shall provide a letter from the Airport Management Agency showing that the project complies with the ALUC Guidelines for new structures within the boundary of an ALUCP.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer/Architect	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Wildland Fire HAZ-5 Prior to approval of new facilities (recharge basins, new production wells, pipeline interconnects and related facilities) that would be located in areas designated as Fire Hazard Severity Zones by CAL FIRE, a site-specific Fire Management Plan shall be developed that identifies fire hazard reduction measures to be implemented during construction. These measures shall address all staging areas, welding areas, or areas slated for development that are planned to use spark-producing equipment. These areas shall be cleared of dried vegetation or other material that could ignite. Any construction equipment that includes a spark arrestor shall be equipped with a spark arrestor in good working order. During the construction of the project facilities, all vehicles and crews working at the project site to have access to functional fire extinguishers at all times. In addition, construction crews shall have a spotter during welding activities to look out for potentially dangerous situations, including accidental sparks. A Fire Management Plan shall also be implemented at those sites where maintenance activities may be similar to construction activities.	Prior to approval of new facilities that would be located in areas designated as Fire Hazard Severity Zones by CAL FIRE. The Fire Management Plan shall be implemented during all stages of construction.	A copy of the construction contract including MM HAZ-5 shall be retained in the project file. A copy of the Fire Management Plan shall be placed in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Wildland Fire HAZ-6 Prior to commencement of maintenance activities during long term operation of facilities located in Fire Hazard Severity Zones, the Watermaster Party conducting operations/maintenance (e.g., spreading ground desilting and vegetation removal, maintenance of well sites, etc.) shall ensure that a Fire Management Plan shall be included in the maintenance plans for each facility.	Prior to commencement of maintenance activities that would be similar to construction activities, the Fire Management Plan shall be modified (if necessary) and implemented during maintenance activities that would be similar to construction activities (e.g., vegetation removal, basin desilting)	A copy of the construction contract including MM HAZ-6 shall be retained in the project file. A copy of the Fire Management Plan shall be placed in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Hydrology / Water Quality HWQ-1 Groundwater Production. To avoid potential impacts associated with the loss of groundwater that may migrate out of the Pomona Basin or UCHB during periods of high groundwater levels, prior to commencement of improvements to existing groundwater production wells, or the development of new production wells in the Pomona Basin and UCHB, Watermaster staff shall conduct groundwater modeling in areas where high groundwater is known to occur in the area along the San Jose fault.	Prior to commencement of improvements to existing groundwater production wells, or the development of new production wells in the Pomona Basin and UCHB conduct groundwater modeling.	Results of groundwater modeling shall be presented to the Six Basins Watermaster Board for review.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Watermaster Staff	Watermaster Staff	

Mitigation Measure	Implementation Schedule	Verification	Source
Hydrology / Water Quality			
HWQ-2 <u>Implementation of a SWPPP and the Use of BMPs During Construction</u>. Prior to commencement of any ground disturbing activities on a project site, the Watermaster Party proposing the project or construction contractor shall prepare a SWPPP (area of disturbance one acre or greater) and submit a Notice of Intent to the State Water Resources Control Board. Implementation of BMPs as outlined in the SWPPP shall be ongoing during construction activities. A copy of the SWPPP and the Waste Discharge Identification (WDID) number, shall be kept at the construction site and available for review by inspectors until construction is completed. For sites where the area of disturbance would be less than one acre, the project proponent or construction contractor is still responsible for maintaining the site and must provide the local jurisdiction in which construction activities will take place, with a list of BMPs and a schedule for completion of such activities, prior to commencement of construction activities.	MM HWQ-2 shall be included in the construction contract as a contract specification. Prior to commencement of any ground disturbing activities, the Project Engineer or Construction Contractor shall submit a Notice of Intent (NOI) to the State Water Resources Control Board to receive a Waste Discharge Identification Number (WDID). Provide a copy of the site-specific SWPPP and WDID to the Implementing Agency.	A copy of the construction contract including MM HWQ-2 shall be retained in the project file. A copy of the SWPPP and NOI shall be provided to the Implementing Agency. A copy of the SWPPP and NOI shall be kept at the construction site for review during site inspections by the Implementing Agency.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Hydrology / Water Quality HWQ-3 <u>Implementation of a Drainage Plan to Reduce Downstream Flows</u>. Prior to construction of project facilities, the Watermaster Party proposing a project shall prepare a drainage plan that includes design features to reduce stormwater peak concentration flows exiting the above ground facility sites so that the capacities of the existing downstream drainage facilities are not exceeded. These design features could include bioretention, sand infiltration, return of stormwater for treatment within the treatment plant, and/or detention facilities.	MM HWQ-3 shall be included in the construction contract as a contract specification. The Drainage Plan shall be completed prior to commencement of ground disturbance and shall show how post-construction site drainage would be controlled.	A copy of the construction contract including MM HWQ-3 shall be retained in the project file. A copy of the Drainage Plan shall be submitted to the Implementing Agency prior to commencement of ground disturbance for review and approval. A copy of the Drainage Plan shall be kept in the file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Hydrology / Water Quality HWQ-4 <u>Dewatering General Permit</u>. Prior to commencement of construction activities that would require dewatering and conveyance of groundwater to surface water including but not limited to a storm drain system, the Watermaster Party proposing a project shall submit a Notice of Intent (NOI) to SWRCB under the requirements of the NPDES Dewatering General Permit. The NOI shall include any additional information including a list of BMPs for preventing degradation of water quality or impairment of receiving waters.	MM HWQ-4 shall be included in the construction contract as a contract specification. Prior to commencement of construction activities that would require dewatering, the Watermaster Party undertaking the project shall submit an NOI to SWRCB under the requirements of the State's NPDES Dewatering General Permit. SWRCB shall issue a written determination of eligibility for coverage under the General Permit.	A copy of the construction contract including MM HWQ-4 shall be retained in the project file. A copy of the project's permit for coverage under NPDES Dewatering General Permit shall be provided to the Implementing Agency prior to commencement of well drilling. A copy of the NOI and permit shall be kept in the file. Verification of implementation shall be based on field inspections by the Implementing Agency.	Draft PEIR

Mitigation Measure	Implementation Schedule	Verification	Source
Hydrology / Water Quality HWQ-4 (cont.)		Field notes documenting verification shall be retained in the project file.	
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Party	

Mitigation Measure	Implementation Schedule	Verification	Source
Land Use / Planning No mitigation measures			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**

Mitigation Measure	Implementation Schedule	Verification	Source
Noise <u>Construction</u> NOI-1 The following mitigation measures are required to reduce noise and vibration levels produced by the construction equipment at nearby, occupied sensitive receiver locations: • A focused construction noise and vibration mitigation plan shall be required if any or both of the following screening criteria are met: ○ If project construction activities would occur within 100 feet of occupied, sensitive receiver locations (e.g., residential, school, etc. uses): - A focused construction noise mitigation plan shall be required which evaluates whether project construction noise levels would exceed the 65 dBA Leq exterior noise level limit at occupied sensitive receiver locations, and the mitigation measures (if any) necessary to satisfy the 65 dBA Leq exterior noise level limit. - Potential mitigation measures to reduce project construction noise levels include, but are not limited to, temporary noise barriers, the use of alternative equipment, noise level monitoring, temporary relocation of residents, or a combination of the above.	MM NOI-1 shall be included in the construction contract as a contract specification. Prior to commencement of construction activities. a focused Construction Noise and Vibration Mitigation Plan shall be prepared if screening criteria for noise generating construction activities in excess of local Noise Standards are met. Implementation of the Construction Noise and Vibration Mitigation Plan shall be implemented throughout the construction period when screening criteria are met.	A copy of the construction contract including MM NOI-1 shall be placed in the project file. A copy of the Construction Noise and Vibration Mitigation Plan shall be placed in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Noise Construction NOI-2 During all project site construction, the construction contractors shall ensure that all construction equipment, fixed or mobile, shall have properly operating and maintained mufflers, consistent with manufacturers' standards. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise-sensitive receivers nearest the project site.	MM NOI-2 shall be included in the construction contract as a contract specification. Prior to commencement of construction activities, the construction contractor shall provide the Implementing Agency with a list of construction equipment and vehicles and verify that all equipment and vehicles are in good operational condition per manufacturers standards.	A copy of the construction contract including MM NOI-2 shall be placed in the project file. A copy of the equipment/vehicle list shall be placed in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Noise Construction NOI-3 The construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receivers nearest the project site during all project construction (i.e., the center of each site).	MM NOI-2 shall be included in the construction contract as a contract specification. Prior to commencement of construction activities, the construction contractor shall provide the Implementing Agency with a site plan showing where staging areas will be located during construction to ensure that all stationary construction equipment that emit noise, is directed away from the noise-sensitive receivers nearest the project site.	A copy of the construction contract including MM NOI-2 shall be placed in the project file. A copy of the Site Plan showing the location of the staging area shall be placed in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Noise <u>Construction</u> NOI-4 The contractor shall design delivery routes of equipment and materials to minimize the exposure of sensitive land uses or residential dwellings to delivery truck-related noise.	MM NOI-4 shall be included in the construction contract as a contract specification. Prior to commencement of construction activities, the construction contractor shall provide the Implementing Agency with a map showing delivery routes. All vendors making deliveries of equipment and materials shall be provided with a copy of the map of delivery routes.	A copy of the construction contract including MM NOI-4 shall be placed in the project file. A copy of the delivery route map showing the location of the staging area shall be placed in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency Correspondence documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Noise <u>Construction</u> NOI-5 If high vibration-generating project construction activities such as well drilling equipment, heavy mobile equipment (greater than 80,000 pounds), or large loaded trucks would be used: • Within 25 feet of occupied, sensitive receiver locations in the cities of Claremont, Pomona, La Verne, and Upland; or • Within 50 feet of occupied, sensitive receiver locations in unincorporated County of Los Angeles: o A focused construction vibration mitigation plan shall be required which evaluates whether project construction vibration levels would exceed the exterior vibration level limit at occupied sensitive receiver locations, specific to that jurisdiction's standards, and the mitigation measures (if any) necessary to satisfy the exterior vibration level limit. - Potential mitigation measures to reduce project construction vibration levels include, but are not limited to, the use of alternative equipment, vibration level monitoring, temporary relocation of residents, or a combination of the above.	MM NOI-5 shall be included in the construction contract as a contract specification. Prior to commencement of construction activities, a focused Construction Vibration Mitigation Plan shall be prepared and submitted to the Implementing Agency for review and approval if either of the two distance criteria identified in the measure are met. The Construction Vibration Mitigation Plan shall be implemented throughout the construction schedule or until such time as the high-vibration activities cease.	A copy of the construction contract including MM NOI-5 shall be placed in the project file. A copy of the approved Construction Vibration Mitigation Plan shall be placed in the project file. Verification of implementation shall be through reporting by the construction contractor to the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Noise Operation NOI-6 The following operational noise abatement measures shall be required to further reduce the potential operational noise levels received at nearby sensitive receiver locations: • New, or existing unenclosed, well pumps shall be enclosed to further reduce operational noise levels at nearby sensitive receiver locations (e.g., residential homes). The location of any louvres or openings in the enclosure assembly would reduce the overall noise reduction of the enclosure, and therefore, shall be oriented away from nearby residential homes, if feasible. In addition, acoustically-rated louvres and materials within the enclosure construction are recommended to further reduce the noise levels at the well pump source. • All trucks transiting on-site in outdoor areas of the project facilities should be operated with properly functioning and well-maintained mufflers. • Maintain quality pavement conditions on the property that are free of vertical deflection (i.e., speed bumps) to minimize truck noise. • Truck access gates and loading areas should have posted signs which state: 1. Truck drivers shall turn off engines when not in use; 2. No music or electronically reinforced speech from workers should be audible at noise-sensitive properties.	MM NOI-6 shall be included in the construction contract as a contract specification. Prior to approval of a project, the Site Plan showing how operational noise abatement measures shall be incorporated into the design of new facilities. The Site Plan shall be reviewed and approved by the Implementing Agency. During long-term operation of a project, if changes to the approved operational noise abatement measures, such changes shall be submitted to the Implementing Agency for review and approval.	A copy of the construction contract including MM NOI-6 shall be placed in the project file. A copy of the approved Site Plan shall be placed in the project file. Verification of implementation during construction shall be through reporting by the construction contractor to the Implementing Agency. Field notes documenting verification shall be retained in the project file. Verification of approved changes to the operation of a facility shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Architect Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Population / Housing No mitigation measures			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**

Mitigation Measure	Implementation Schedule	Verification	Source
Public Services and Recreation <u>Emergency Planning and Traffic Control</u> Refer to mitigation measures TR-1, TR-2, TR-3			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Public Services and Recreation <u>Wildland Fire</u> Refer to mitigation measures HAZ-5 and HAZ-6			Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Transportation TR-1 Prior to initiating construction of proposed facilities, the Watermaster Party proposing a project or the designated construction contractor, shall prepare and implement a Construction Traffic Management Plan that contains comprehensive strategies for maintaining emergency access on public streets. In general, the Construction Traffic Management Plan shall ensure that to the extent practical, construction traffic would access a project site during off-peak hours or limited access during the peak hours; and that construction traffic would be routed to avoid travel through, or proximate to, sensitive land uses. The Plan shall also include, where necessary, the use of flags, signs and lights, as well as flag persons to direct traffic. Where a project includes new pipelines to connect wells to treatment facilities or to connect the Pomona WTP to the new SASG recharge basin, strategies shall include, but are not limited to, maintaining steel trench plates on public streets to restore access across open trenches and identification of alternate routing around construction zones. Police, fire, and other emergency service providers shall be notified of the timing, location, and duration of the construction activities and the location of detours and lane closures. The Watermaster Party proposing a project, or designated construction contractor shall ensure that the Construction Traffic Management Plan and other construction activities are consistent with the Emergency Response Plan of the jurisdiction in which the project is being constructed	MM TR-1 shall be included in the construction contract as a contract specification. Prior to initiating construction of proposed facilities, the Watermaster Party proposing a project or the designated construction contractor, shall prepare and implement a Construction Traffic Management Plan. The Watermaster Party proposing a project, or designated construction contractor shall ensure that the Construction Traffic Management Plan and other construction activities are consistent with the Emergency Response Plan of the jurisdiction in which the project is being constructed.	A copy of the construction contract including MM TR-1 shall be retained in the project file. A copy of the Construction Traffic Management Plan shall be placed in the project file. Verification of implementation shall be based on field inspections by the Implementing Agency. Field notes documenting verification shall be retained in the project file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Transportation TR-2 As part of the Construction Traffic Management Plan, it shall be stipulated that the delivery and removal of heavy equipment shall be conducted during off- peak hours to minimize the heavy truck activity during the morning and evening peak periods (7 to 9 am and 4 to 6 pm) in order to have nominal impacts to traffic and circulation near the vicinity of a project.	See Implementation Schedule for MM TR-1.	See Verification notes in MM NOI-1.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Transportation TR-3 During the site grading, where export of material is required, the construction contractor shall limit export activity between the hours of 7 to 9 am (morning peak period) and 4 to 6 pm (evening peak period) to fewer than the equivalent of 50 passenger car equivalent (PCE) truck trips per hour. 50 PCE truck trips equates to approximately 16 total trucks (8 trucks in and 8 trucks out) during the peak periods specified above in order to limit the potential impacts of haul truck activity during these busy commute times: *50 PCE truck trips / 3.0 PCE factor =* *16 total trucks during the peak hour*	See Implementation Schedule for MM TR-1.	See Verification notes in MM NOI-1.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer Construction Contractor	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Utilities / Service Systems / Energy			
USS-1 <u>Implementation of a Drainage Plan to Reduce Downstream Flows</u>. Prior to construction of project facilities, the Watermaster Party proposing a project shall prepare a drainage plan that includes design features to reduce stormwater peak concentration flows exiting the above ground facility sites so that the capacities of the existing downstream drainage facilities are not exceeded. These design features could include bioretention, sand infiltration, return of stormwater for treatment within the treatment plant, and/or detention facilities.	MM USS-1 shall be included in the construction contract as a contract specification. The Drainage Plan shall be completed prior to commencement of ground disturbance and shall show how post-construction site drainage would be controlled.	A copy of the construction contract including MM USS-1 shall be retained in the project file. A copy of the Drainage Plan shall be submitted to the Implementing Agency prior to commencement of ground disturbance for review and approval. A copy of the Drainage Plan shall be kept in the file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

Mitigation Measure	Implementation Schedule	Verification	Source
Utilities / Service Systems / Energy			
USS-2 <u>Implementation of a Construction and Demolition Disposal Plan</u>. Prior to commencement of construction, the contractor shall prepare a Construction and Demolition C&D) disposal plan for review and approval by the local jurisdiction where construction will occur. Per CGBC Section 45.408.1.1, *Construction Waste Management Plan*, the C&D Disposal Plan shall include the following elements: 1. Identifies the construction and demolition waste materials to be diverted from disposal by efficient usage, recycling, reuse on the project or salvage for future use or sale. 2. Determines if construction and demolition waste materials will be sorted on-site (source-separated) or bulk mixed (single stream). 3. Identifies diversion facilities where construction and demolition waste material collected will be taken. 4. Specifies that the amount of construction and demolition waste materials diverted shall be calculated by weight or volume, but not by both.	MM USS-2 shall be included in the construction contract as a contract specification. The Construction and Demolition Disposal Plan shall be completed prior to commencement of construction and be implemented throughout construction activities.	A copy of the construction contract including MM USS-2 shall be retained in the project file. A copy of the Construction and Demolition Disposal Plan shall be submitted to the Implementing Agency prior to commencement of ground disturbance for review and approval. A copy of the Construction and Demolition Disposal Plan shall be kept in the file.	Draft PEIR
	Responsible Party	**Monitoring Party**	**Status / Date / Initials**
	Project Engineer	Implementing Agency	

NOTICE OF AVAILABILITY (NOA) OF A FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT (FPEIR)

In accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines, notice is hereby given that Three Valleys Municipal Water District is issuing the Six Basins Strategic Plan Final Program Environmental Impact Report (FPEIR) for public review and comment that identifies and evaluates the environmental impacts of the below-named project.

Project Title: Six Basins Strategic Plan (PROJECT)

Project Location: Various Locations in the cities of Claremont, La Verne, Pomona, and Upland in the counties of Los Angeles and San Bernardino.

Project Description: The Project consists of a number of individual projects in three categories, Pump and Treat consisting of upgrades to existing production wells and treatment facilities, Water Recharge consisting of the development of new or expansion of existing recharge facilities, and Temporary Surplus consisting of the development of new production and monitoring wells, a new treatment facility, and interconnects (pipelines) between wells and treatment facilities, or an interconnect between the Pomona Reclamation Plant and the new recharge basins in the San Antonio spreading grounds. The operational concept is to maximize the use of surplus local and imported surface water when it is available in greater volumes during wet periods, so that groundwater will be more available and reliable during dry periods when surface-water supplies are reduced. Although the planning period for the Strategic Plan is approximately 75 years, a 20-year construction/operation period was evaluated in the PEIR.

Any questions regarding the project may be directed to Ben Peralta, at (909) 621-5568 ext. 109 or at bperalta@tvmwd.com**.**

Public Comment Period: The FPEIR is available for review and comment at: www.threevalleys.com. The DPEIR was available for public review between May 26 and July 26, 2021. The FPEIR consists of the responses to comments received on the DPEIR and minor revisions to the DPEIR in response to those comments. The review of the FPEIR should focus on the responses to comments received on the DPEIR. Interested persons may provide comments on the FPEIR by writing to Ben Peralta, TVMWD, 1021 E. Miramar Ave., Claremont, CA 91711-2052, or via email to bperalta@tvmwd.com. Failure to file objections to the FPEIR during this period may constitute a waiver of rights to object to the environmental determination to be made at a public hearing of the TVMWD Board at a date and time shown below.

Public Hearing: A public hearing to consider adoption of the FPEIR will be held on **Wednesday, November 3, 2021, at 8:00AM**. A separate notice regarding that hearing will be distributed in advance of that hearing date. All interested persons are invited to appear via teleconference and be heard. None of the project site is not included on a list of sites compiled pursuant to Government Code section 65962.5 regarding hazardous waste. Pursuant to Government Code Section 54954.2(a), any request for disability-related modification or accommodation (including auxiliary aids or services) that is sought in order to participate in the future agendized public meeting should be directed to the District's Executive Assistant at (909) 621-5568 at least 24 hours prior to said meeting.

Para informaciòn en Español, llame (909) 621-5568.

Publication dates: October 18, 2021, and October 25, 2021

San Gabriel Valley Tribune
Affiliated with SGV Newspaper Group
605 E. Huntington Dr., Suite 100
Monrovia, CA 91016
626-962-8811 ext. 40891

Item 8 - Exhibit C

5038502

THREE VALLEYS MUNICIPAL WATER
1021 E. MIRIMAR AVE.
CLAREMONT, CA 91711-1300

PROOF OF PUBLICATION
(2015.5 C.C.P.)

STATE OF CALIFORNIA
County of Los Angeles

I am a citizen of the United States, and a resident of the county aforesaid. I am over the age of eighteen years and not a party to or interested in the above-entitled matter. I am the principal clerk of the printer of SAN GABRIEL VALLEY TRIBUNE, a newspaper of general circulation for the City of West Covina, by the Superior Court of the County of Los Angeles, State of California, on the date of September 10, 1957, Case Number 684891. The notice, of which the annexed is a true printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

10/18/2021, 10/25/2021

I declare under the penalty of perjury that the foregoing is true and correct.

Executed at Monrovia, LA Co. California
On this 27th day of October, 2021.

Evangelina Almeida

Signature

Legal No. **0011495004**

NOTICE OF AVAILABILITY (NOA) OF A FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT (FPEIR)

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Publication dates: October 18, 2021, and October 25, 2021
San Gabriel Valley Tribune **Ad#11495004**

Inland Valley Daily Bulletin
(formerly the Progress Bulletin)
3200 Guasti Road, Suite 100
Ontario, CA 91761
909-987-6397
legals@inlandnewspapers.com

Item 8 - Exhibit C

5038501

THREE VALLEY WATER DIST-LEGAL
1021 MIRAMAR AVENUE
CLAREMONT, CA 91711

PROOF OF PUBLICATION
(2015.5 C.C.P.)

STATE OF CALIFORNIA
County of Los Angeles

I am a citizen of the United States, I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principal clerk of the printer of INLAND VALLEY DAILY BULLETIN, a newspaper of general circulation printed and published daily for the City of Pomona, County of Los Angeles, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Los Angeles, State of California, on the date of June 15, 1945, Decree No. Pomo C-606. The notice, of which the annexed is a true printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

10/18/2021, 10/25/2021

I declare under the penalty of perjury that the foregoing is true and correct.

Executed at Ontario, San Bernardino Co., California, on this 28th day of October, 2021.

Evangelina Almeida

Signature

Legal No. **0011494940**

NOTICE OF AVAILABILITY (NOA) OF A FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT (FPEIR)

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Publication dates: October 18, 2021, and October 25, 2021
Inland Valley Daily Bulletin Ad#11494940

Board of Directors
Staff Report

To: TVMWD Board of Directors

From: Matthew H. Litchfield, General Manager

Date: November 3, 2021

Subject: **CY 2022 Meeting Schedule**

☐	**For Action**	☐	**Fiscal Impact** **$**
☒	**Information Only**	☐	**Funds Budgeted:**

Staff Recommendation:

No Action Necessary – Informational Item Only

Discussion:

The proposed CY 2022 meeting schedule includes information regarding Regular Board Meetings and major conference events planned for CY 2022. The occurrence of MWD Inspection Tours and TVMWD Leadership Breakfasts will be based on the COVID-19 restrictions in place at that time.

Strategic Plan Objective(s):

3.3 Be accountable and transparent with major decisions

Attachment(s):

Exhibit A – CY 2022 Meeting Schedule

Meeting History:

None

NA/ML

THREE VALLEYS MUNICIPAL WATER DISTRICT
2022 BOARD MEETING AND CONFERENCE SCHEDULE

Adopted: Draft

LEGEND
Board Meetings
District Holidays
Leadership Breakfast
Major Conferences
MWD Inspection Tours - TBD

JANUARY 2022
Holiday - January 1
Board Meeting - January 5
Board Meeting - January 19

FEBRUARY 2022
Board Meeting - February 2
Board Meeting - February 16
Holiday - February 21
Leadership Breakfast - February 24

MARCH 2022
Board Meeting - March 2
Board Meeting - March 16

APRIL 2022
Board Meeting - April 6
Board Meeting - April 20
CA-NV Spring Conference - April 11-14

MAY 2022
ACWA Spring Conference - May 3-6
Board Meeting - May 4
Board Meeting - May 18
Holiday - May 30

JUNE 2022
Board Meeting - June 1
AWWA Annual Conference - June 12-15
Board Meeting - June 15

JULY 2022
Holiday - July 4
Board Meeting - July 6
Board Meeting - July 20
July Board meetings subject to cancellation

AUGUST 2022
Board Meeting - August 3
Board Meeting - August 17
CA/NV Water Education Seminar - August 17
CSDA Annual Conference - August 22-25
August Board meetings subject to cancellation

SEPTEMBER 2022
Holiday - September 5
Board Meeting - September 7
Board Meeting - September 21

OCTOBER 2022
Board Meeting - October 5
Holiday - October 11
Board Meeting - October 19
CA-NV Fall Conference - October 24-26

NOVEMBER 2022
Board Meeting - November 2
Holiday - November 10
Board Meeting - November 16
Holiday - November 24-25
ACWA Fall Conf. - November 29 - December 2

DECEMBER 2022
Board Meeting - December 7
Board Meeting - December 21
Holiday - December 26

Board of Directors
Staff Report

To: TVMWD Board of Directors

From: Bob Kuhn, President

Date: November 3, 2021

Subject: **Employee Deferred Compensation**

☐	**For Action**	☐	**Fiscal Impact**	☐	**Funds Budgeted**
☒	**Information Only**	☒	**Cost Estimate:**	$28,800	

Staff Recommendation:

No Action Necessary – Informational Item Only

Background:

In 2015, TVMWD adopted the most recent version of the deferred compensation program. TVMWD matches employee's contributions into a 457 deferred compensation plan up to $400 per month. Members of the Board of Directors and part-time employees are not eligible for this benefit program.

Discussion:

The 2022 benefit renewal generated a $17,000 calendar year savings to TVMWD. I advocate passing the savings to the employee's deferred compensation program in the form of an increase to the deferred compensation match from $400 per month to $500 per month. The program is currently utilized by 100% of the employees. Considering the history of the program, I believe the employees would increase their contribution to a minimum of $500 per month to benefit from TVMWD's match.

Increasing the deferred compensation match to $500 per month would have a potential yearly cost of $28,800. The benefit renewal savings would offset the majority of the additional cost for 2022.

This program promotes the philosophy that certain benefits should be a shared cost by the employer and employee. To acknowledge the great job staff has done over the last several years, especially during the pandemic, I am recommending increasing the match from $400 per month to $500 per month.

Strategic Plan Objective(s):

3.3 – Be accountable and transparent with major decisions

Attachment(s):

None

Meeting History:

None

NA/ML

Board of Directors
Staff Report

To: TVMWD Board of Directors

From: Matthew H. Litchfield, General Manager

Date: November 3, 2021

Subject: **New Policies**

☐	**For Action**	☐	**Fiscal Impact**	**$**
☒	**Information Only**	☐	**Funds Budgeted:**	

Staff Recommendation:

No action Necessary- Information Item Only

Background:

With recent Board/staff input, staff has developed the following policies for board review and comment:

- **Diversity, Equity and Inclusion Policy (DEI)**- Promotes the representation and participation of different groups of individuals, including people of different ages, races and ethnicities, abilities and disabilities, genders, religions, cultures and sexual orientations.

- **Outreach Program Policy**- Provides a procedure and guidelines for when members of the Board are requested to have TVMWD sponsor a public outreach program.

Discussion:

The intent of these policies is to further transparency on pertinent activities that TVMWD is becoming more involved with. Staff will provide an update of these two policies this morning and bring back to the Board on November 17th for additional review and consideration of approval.

Strategic Plan Objective(s):

3.3 – Be accountable and transparent with major decisions

Attachment(s):

Exhibit A – Diversity, Equity and Inclusion Policy

Exhibit B – Outreach Program Policy

Meeting History:

None

NA/ML

THREE VALLEYS MWD	POLICY TITLE **Diversity, Equity and Inclusion Policy**	APPROVAL DATE **TBD**	Page 1 of 1

TVMWD is committed to fostering, cultivating and preserving a culture of diversity, equity and inclusion.

Our human capital is the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and company's achievement as well.

We embrace and encourage our employees' differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our employees unique.

TVMWD diversity initiatives are applicable, but not limited, to our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on the premise of gender and diversity equity that encourages and enforces:

- Respectful communication and cooperation between all Directors and employees, whether temporary, part-time, or full-time.
- Teamwork and employee participation, permitting the representation of all groups and employee perspectives.
- Work/life balance through flexible work schedules to accommodate employees' varying needs.

All employees of TVMWD have a responsibility to treat others with dignity and respect at all times. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other company-sponsored and participative events. All employees are also required to attend and complete periodic diversity awareness training to enhance their knowledge to fulfill this responsibility.

Any employee found to have exhibited any inappropriate conduct or behavior against others may be subject to disciplinary action.

Employees who believe they have been subjected to any kind of discrimination that conflicts TVMWD's diversity policy and initiatives should seek assistance from a supervisor or a Human Resources representative.

THREE VALLEYS MWD	POLICY TITLE **Outreach Program Policy**	APPROVAL DATE **TBD**	Page 1 of 2

SECTION 1: Purpose of policy

Situations may arise where a member of the TVMWD Board is requested to have TVMWD participate in a public outreach program. If staff has adequate advance notice of the request and the sufficient information on the program, such participation will go through the General Manager and when merited, the Board approval process. However, Directors may exercise discretion to authorize approval of request in a timelier manner.

SECTION 2: Background

Directors may request that TVMWD pay for sponsorships and/or community event participation, not to exceed a pre-determined amount in the TVMWD's annual Public Outreach Program budget, for events that are not prohibited based on this policy.

SECTION 3: Application of policy

1. Directors may exercise discretion for TVMWD to pay for sponsorships and/or community events not to exceed a total of $1,000 per event, which shall include funding support, the donation of materials, supplies and promotional giveaways for such events.
2. TVMWD sponsored events may not be political and/or partisan in nature. Example: TVMWD may not sponsor a fundraiser for a political candidate using discretionary public outreach funds.
3. Proceeds from a TVMWD sponsored event may not be used to sustain campaign type activities. Example: Funds may not be used to print literature for a director's reelection to the water board.
4. Outreach funds may not be used for purchasing media advertisements.
5. TVMWD will only issue payments through checks or credit card paid directly to host organizations which meet these guidelines. No cash disbursements or reimbursements will be made for sponsored events covered by these guidelines.
6. Staff shall provide a quarterly summary of the outreach program funding and remaining balance.
7. Directors that are up for election/reelection in an election year shall not participate in such public awareness activities from the date of filing for office until the second business day following the election- or as currently prescribed by FPPC regulations.
8. Events sponsored by religious/church organizations are not eligible for TVMWD- sponsored funds unless the event is open to the general public and is for a non-sectarian purpose.
9. The purpose of a sponsorship and/or community event participation must align with the annual TVMWD Strategic Plan goals to:

    a) Provide an Adequate, Reliable, High-Quality Water Supply; and,

b) Be Financially Responsible and Maintain Public Trust.

10. Sponsorships shall provide a direct nexus to water awareness, conservation, education, groundwater quality and the protection of related resources.

Board of Directors
Staff Report

To: TVMWD Board of Directors

From: Matthew H. Litchfield, General Manager

Date: November 3, 2021

Subject: **OPEB Trust – Consideration of Additional Contribution and Investment Strategies**

☐	**For Action**	☐	**Fiscal Impact**
☒	**Information Only**	☐	**Funds Budgeted:**

Staff Recommendation:

No Action Necessary – Informational Item Only

Background:

TVMWD provides limited healthcare benefits to retirees. Retiree healthcare benefits or OPEB (Other Post Employment Benefits) are paid through a combination of direct payments to JPIA and reimbursement of premiums paid by retirees via Basic Benefits, LLC.

Discussion - Contribution:

An actuarial valuation is performed biennially to determine the current liability for these future obligations. A copy of the most recent valuation is attached. For funding purposes, TVMWD is only concerned with the total explicit liabilities stated in the valuation of $1,175,983.

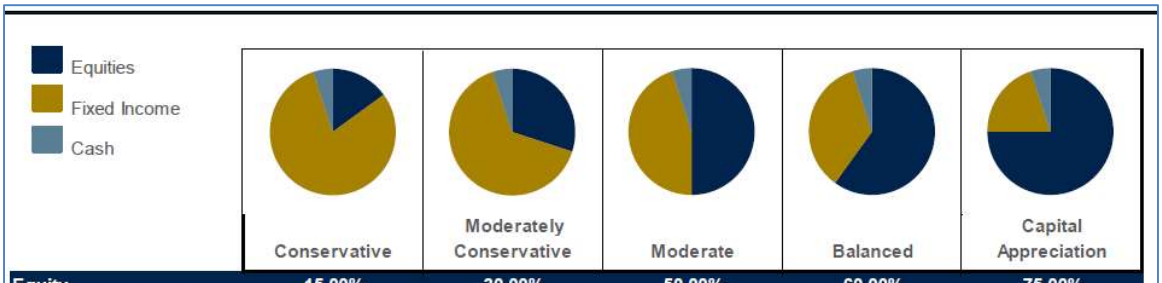
TVMWD established an IRS Section 115 Trust with PARS in November of 2016 to legally set-aside funds for TVMWD's OPEB liabilities. Here is a summary of TVMWD's OPEB Trust:

Initial Contribution	$ 680,247
Additional Contributions	115,554
Total Contributions	795,801
Disbursements	0
Total Investment Earnings	347,134
Account Balance	$1,142,935

This reflects that TVMWD's total OPEB obligations are 97% funded. Our stated goal is to be 90% funded, so no additional contributions to the OPEB Trust are recommended at this time.

Discussion – Investment Strategy:

The investment manager for the OPEB Trust is HighMark Capital Management, who offers the following investment strategies:



	Conservative	Moderately Conservative	Moderate	Balanced	Capital Appreciation
Equity	**15.00%**	**30.00%**	**50.00%**	**60.00%**	**75.00%**
Large Cap Core	7.50%	15.50%	26.50%	32.00%	39.50%
Mid Cap Core	1.50%	3.00%	5.00%	6.00%	7.50%
Small Cap Core	2.50%	4.50%	7.50%	9.00%	10.50%
Real Estate	0.50%	1.00%	1.75%	2.00%	2.00%
International	2.00%	4.00%	6.00%	7.00%	10.25%
Emerging Markets	1.00%	2.00%	3.25%	4.00%	5.25%
Fixed Income	**80.00%**	**65.00%**	**45.00%**	**35.00%**	**20.00%**
Short Term Bond	25.75%	14.00%	10.00%	6.75%	3.00%
Intermediate Term Bond	52.25%	49.25%	33.50%	27.00%	16.00%
High Yield	2.00%	1.75%	1.50%	1.25%	1.00%
Cash	**5.00%**	**5.00%**	**5.00%**	**5.00%**	**5.00%**
Expected Return	4.45%	5.14%	5.89%	6.22%	6.64%
Expected Standard Deviation	3.43%	5.15%	8.24%	9.92%	12.53%

The OPEB Trust has been invested in the Moderate strategy since inception and earned a net return of approximately 8%

Since OPEB liabilities are almost fully funded and the pool of participants (13 retirees to 24 active employees) is still at an early stage in its cycle, staff feels TVMWD can take more risks as there is time to recover any possible losses. Therefore, staff's recommendation is to remain in the Moderate strategy.

Strategic Plan Objective(s):

3.1 – Utilize and comply with a set of financial policies to maintain TVMWD's financial health

3.3 – Be accountable and transparent with major decisions

Attachment(s):

Exhibit A – OPEB Actuarial Valuation

Exhibit B – PARS Diversified Portfolios

Meeting History:

None

NA/JL

MacLeod Watts

August 25, 2021

James Linthicum
Chief Financial Officer
Three Valleys Municipal Water District
1021 E. Miramar Avenue
Claremont, CA 91711

Re: Three Valleys Municipal Water District Other Post-Employment Benefits
April 1, 2021, Actuarial Valuation and GASB 75 Report for Fiscal Year Ending June 30, 2021

Dear Mr. Linthicum:

We are pleased to enclose our actuarial report providing financial information about the other post-employment benefit (OPEB) liabilities of the Three Valleys Municipal Water District. This is the first report we have prepared for the District. The following pages describe our analysis in detail.

The primary purposes of this report are to:

1) Remeasure plan liabilities as of April 1, 2021, in accordance with GASB 75's biennial valuation requirement,
2) Develop Actuarially Determined Contributions levels for prefunding plan benefits,
3) Provide information required by GASB 75 ("Accounting and Financial Reporting for Postemployment Benefits Other Than Pension") to be reported in the District's financial statements for the fiscal year ending June 30, 2021.

The information included in this report reflects our understanding that the District plans to contribute to the OPEB trust as needed, so that 90-100% of the Total OPEB Liability less the implicit subsidy is funded. We based the valuation on the employee data, details on plan benefits and retiree benefit payments reported to us by the District. As with any analysis, the soundness of the report is dependent on the inputs. Please review our summary of this information to be comfortable that it matches your records.

We appreciate the opportunity to work on this analysis and acknowledge the efforts of the District employees who provided valuable time and information to enable us to prepare this report. Please let us know if we can be of further assistance.

Sincerely,

Catherine L. MacLeod

Catherine L. MacLeod, FSA, FCA, EA, MAAA
Principal & Consulting Actuary

Enclosure

Three Valleys Municipal Water District

Actuarial Valuation of Other Post-Employment Benefit Programs As of April 1, 2021

Development of OPEB Prefunding Levels & GASB 75 Report for the FYE June 30, 2021

Submitted August 2021

MacLeod Watts

Table of Contents

A. Executive Summary

This report presents the results of the April 1, 2021, actuarial valuation and accounting information regarding the other post-employment benefit (OPEB) program of the Three Valleys Municipal Water District (the District). The purpose of this valuation is to assess the OPEB liabilities and provide disclosure information as required by Statement No. 75 of the Governmental Accounting Standards Board (GASB 75) for the fiscal year ending June 30, 2021.

Important background information regarding the valuation process can be found in Addendum 1. We recommend users of the report read this information to familiarize themselves with the process and context of actuarial valuations, including the requirements of GASB 75. The pages following this executive summary present exhibits and other information relevant for disclosures under GASB 75.

Absent material changes to this program, the results of the April 1, 2021, valuation will also be applied to prepare the District's GASB 75 report for the fiscal year ending June 30, 2022. If there are any significant changes in the employee population, plan benefits or eligibility, or to the District's funding policy, an earlier valuation might be required or appropriate.

OPEB Obligations of the District

The District offers continuation of medical coverage and/or limited premium subsidy toward outside health coverage. These benefits create one or more of the following types of OPEB liabilities:

- **Explicit subsidy liabilities**: An "explicit subsidy" exists when the employer contributes directly toward the cost of retiree healthcare. In this program, the District pays a portion of healthcare premiums for qualifying retirees. These benefits are described in Section 2.
- **Implicit subsidy liabilities**: An "implicit subsidy" exists when the premiums charged for retiree coverage are lower than the expected retiree claims for that coverage. In the ACWA JPIA medical program, the claims experience of active employees and retirees is co-mingled in setting premium rates for the plans in which District employees and retirees participate, except for those covered by Kaiser Senior Advantage plans after qualifying for coverage under Medicare.

  As is the nature of group premium rate structures, at some ages, retirees may be expected to experience higher claims than the premiums they pay. We determine the implicit rate subsidy as the difference between (a) projected retiree medical claim costs by age and (b) premiums projected to be charged for retiree coverage. For more information on this process see Section 3 and Addendum 2: MacLeod Watts Age Rating Methodology.

  Retirees may not continue dental or vision coverage so there is no implicit subsidy related to this.

OPEB Funding Policy

The District's OPEB funding policy affects the calculation of liabilities by impacting the discount rate that is used to develop the plan liability and expense. "Prefunding" is the term used when an agency consistently contributes an amount based on an actuarially determined contribution (ADC) each year. GASB 75 allows prefunded plans to use a discount rate that reflects the expected earnings on trust assets. Pay-as-you-go, or "PAYGO", is the term used when an agency only contributes the required retiree benefits when due. When an agency finances retiree benefits on a pay-as-you-go basis, GASB 75 requires the use of a discount rate equal to a 20-year high grade municipal bond rate.

Executive Summary
(Continued)

The District has been and continues to prefund its OPEB liability, making recurring contributions to its PARS OPEB trust in addition to paying retiree premium benefits. With the District's approval, the discount rate used for accounting purposes is 5.3%, reflecting the trust investment advisor's expected long-term return on trust assets reduced by trust administration and/or investment management expenses. For more information, see Expected Return on Trust Assets on page 11.

Actuarial Assumptions

The mortality assumptions used in this report were chosen, for the most part, from studies released by the Society of Actuaries. Other assumptions, such as timing and rates of retirement, other employment termination (separation) prior to retirement, age-related healthcare claims, healthcare trend, retiree participation rates and spouse coverage, were selected based on demonstrated plan experience and/or our best estimate of expected future experience. All these assumptions, and more, impact expected future benefits. Please note that this valuation has been prepared on a closed group basis. This means that only employees and retirees present as of the valuation date are considered. We do not consider replacement employees for those we project to leave the current population of plan participants until the valuation date following their employment.

We emphasize that this actuarial valuation provides a projection of future results based on many assumptions. Actual results are likely to vary to some extent and we will continue to monitor these assumptions in future valuations. See Section 3 for a description of assumptions used in this valuation.

Important Dates for GASB 75 in this Report

GASB 75 allows reporting liabilities as of any fiscal year end based on: (1) a *valuation date* no more than 30 months plus 1 day prior to the close of the fiscal year end; and (2) a *measurement date* up to one year prior to the close of the fiscal year. The following dates were used for this report:

Fiscal Year End	June 30, 2021
Measurement Date	June 30, 2021
Measurement Period	June 30, 2020, to June 30, 2021
Valuation Date	April 1, 2021

Significant Results and Differences from the Prior Valuation

This is MacLeod Watts' first valuation and report prepared for the District. No benefit changes were reported to MacLeod Watts relative to those in place at the time the July 2019 valuation was prepared. We carefully reviewed with District staff the benefit levels and plan's intent for each of the plan's current retirees. We reviewed and updated certain assumptions used to project the OPEB liability. We also estimated differences between actual and expected results based on updated census and premium data since July 2017, which are referred to as "plan experience".

The Total OPEB Liability is higher than one year ago. Section C. presents the new valuation results and provides additional information on the impact of the new assumptions and plan experience. See *Recognition Period for Deferred Resources* on page 12 for details on how these changes are recognized.

Executive Summary
(Concluded)

Impact on Statement of Net Position and OPEB Expense for Fiscal Year Ending 2021

The plan's impact to Net Position will be the sum of difference between assets and liabilities as of the measurement date plus the unrecognized net outflows and inflows of resources. Different recognition periods apply to deferred resources depending on their origin. The plan's impact on Net Position on the measurement date can be summarized as follows:

Items	For Reporting At Fiscal Year Ending June 30, 2021
Total OPEB Liability	$ 1,657,730
Fiduciary Net Position	1,150,585
Net OPEB Liability (Asset)	507,145
Deferred (Outflows) of Resources	(498,470)
Deferred Inflows of Resources	276,905
Impact on Statement of Net Position	$ 285,580
OPEB Expense, FYE 6/30/2021	$ 93,644

Important Notices

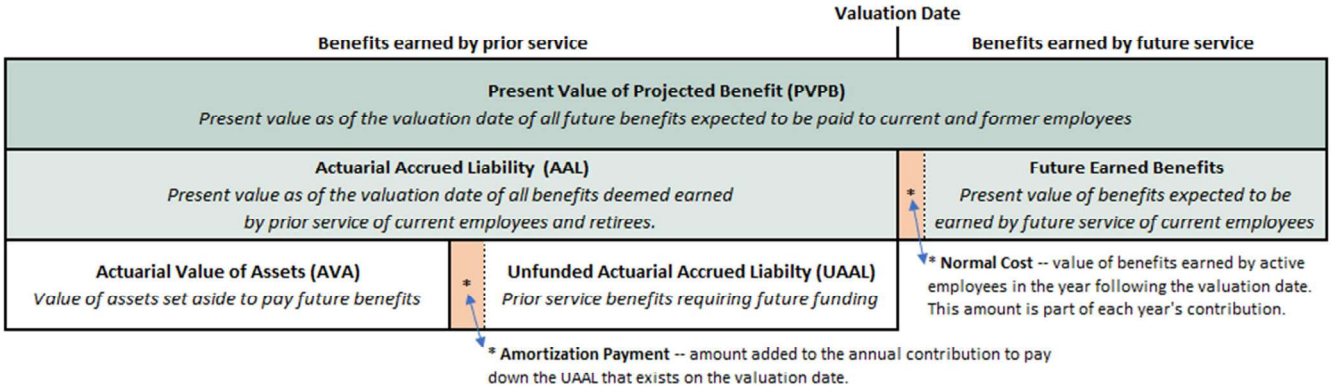
This report is intended to be used only to present the actuarial information relating to other postemployment benefits for the District's financial statements. The results of this report may not be appropriate for other purposes, where other assumptions, methodology and/or actuarial standards of practice may be required or more suitable. We note that various issues in this report may involve legal analysis of applicable law or regulations. The District should consult counsel on these matters; MacLeod Watts does not practice law and does not intend anything in this report to constitute legal advice. In addition, we recommend the District consult with their internal accounting staff or external auditor or accounting firm about the accounting treatment of OPEB liabilities.

B. Valuation Process

This valuation is based on employee census data and benefits initially submitted to us by the District in April 2021 and clarified in various related communications. A summary of the employee data is provided in Section 1 and a summary of the benefits provided under the Plan is provided in Section 2. While individual employee records have been reviewed to verify that they are reasonable in various respects, the data has not been audited and we have otherwise relied on the District as to its accuracy. The valuation has been performed in accordance with the process described below using the actuarial methods and assumptions described in Section 3 and is consistent with our understanding of Actuarial Standards of Practice.

In projecting benefit values and liabilities, we first determine an expected premium or benefit stream over each current retiree's or active employee's future retirement. Benefits may include both direct employer payments (explicit subsidies) and any implicit subsidies arising when retiree premiums are expected to be partially subsidized by premiums paid for active employees. The projected benefit streams reflect assumed trends in the cost of those benefits and assumptions as to the expected dates when benefits will end. Assumptions regarding the probability that each employee will remain in service to receive benefits and the likelihood the employee will elect coverage for themselves and their dependents are also applied.

We then calculate a present value of these future benefit streams by discounting the value of each future expected employer payment back to the valuation date using the valuation discount rate. This present value is called the **Present Value of Projected Benefits (PVPB)** and represents the current value of all expected future plan payments to current retirees and current active employees. Note that this long-term projection does not anticipate entry of future employees.



The next step in the valuation process splits the Present Value of Projected Benefits into 1) the value of benefits already earned by prior service of current employees and retirees and 2) the value of benefits expected to be earned by future service of current employees. Actuaries employ an "attribution method" to divide the PVPB into prior service liabilities and future service liabilities. For this valuation we used the **Entry Age Normal** attribution method. This method is the most common used for government funding purposes and the only attribution method allowed for financial reporting under GASB 75.

We call the value of benefits deemed earned by prior service the **Actuarial Accrued Liability (AAL)**. Benefits deemed earned by service of active employees in a single year is called the **Normal Cost** of benefits. The present value of all future normal costs (PVFNC) plus the Actuarial Accrued Liability will equal the Present Value of Projected Benefits (i.e., PVPB = AAL + PVFNC).

Valuation Process
(Concluded)

The District has made substantial recurring contributions to a trust to prefund plan benefits. Trust contributions and earnings accumulate so that the trust can make benefit payments to retirees (or reimburse the District for making those payments directly). The difference between the value of trust assets (i.e., the Market Value of Assets), or a smoothed asset value (i.e. the Actuarial Value of Assets), and the Actuarial Accrued Liability yields the **Unfunded Actuarial Accrued Liability (UAAL)**. The UAAL represents, as of the valuation date, the present value of benefits already earned by past service that remain unfunded. A plan is generally considered "fully funded" when the UAAL is zero. The plan sponsor of a fully funded plan will still need to make future contributions for benefits earned by future service of actives employees. But in a fully funded plan, the plan sponsor has set aside sufficient assets to pay for benefits that have been earned by past service of current retirees and active employees if all valuation assumptions are realized.

Future contributions by the District will fund 1) the remaining part of OPEB benefits earned by past service (the Unfunded Actuarial Accrued Liability) and 2) the value of benefits earned each year by service of active employees. Various strategies might be employed to pay down the UAAL such as longer or shorter amortization payments, and flat or escalating payments depending on the plan sponsors goals and funding philosophy.

Please note that projections of future benefits over such long periods (frequently 70 or more years) which are dependent on numerous assumptions regarding future economic and demographic variables are subject to substantial revision as future events unfold. While we believe that the assumptions and methods used in this valuation are reasonable for the purposes of this report, the costs to the District reflected in this report are subject to future revision, perhaps materially. Demonstrating the range of potential future plan costs was beyond the scope of our assignment except to the limited extent of providing liability information at various discount rates.

Finally, certain actuarial terms and GASB 75 terms may be used interchangeably. We note a few in the table below.

Actuarial Terminology	GASB 75 Terminology
Present Value of Projected Benefits (PVPB)	*No equivalent term*
Actuarial Accrued Liability (AAL)	Total OPEB Liability (TOL)
Market Value of Assets (MVA)	Fiduciary Net Position
Actuarial Value of Assets (AVA)	*No equivalent term*
Unfunded Actuarial Accrued Liability (UAAL)	Net OPEB Liability
Normal Cost	Service Cost

Specific results from this valuation are provided in the following Section C.

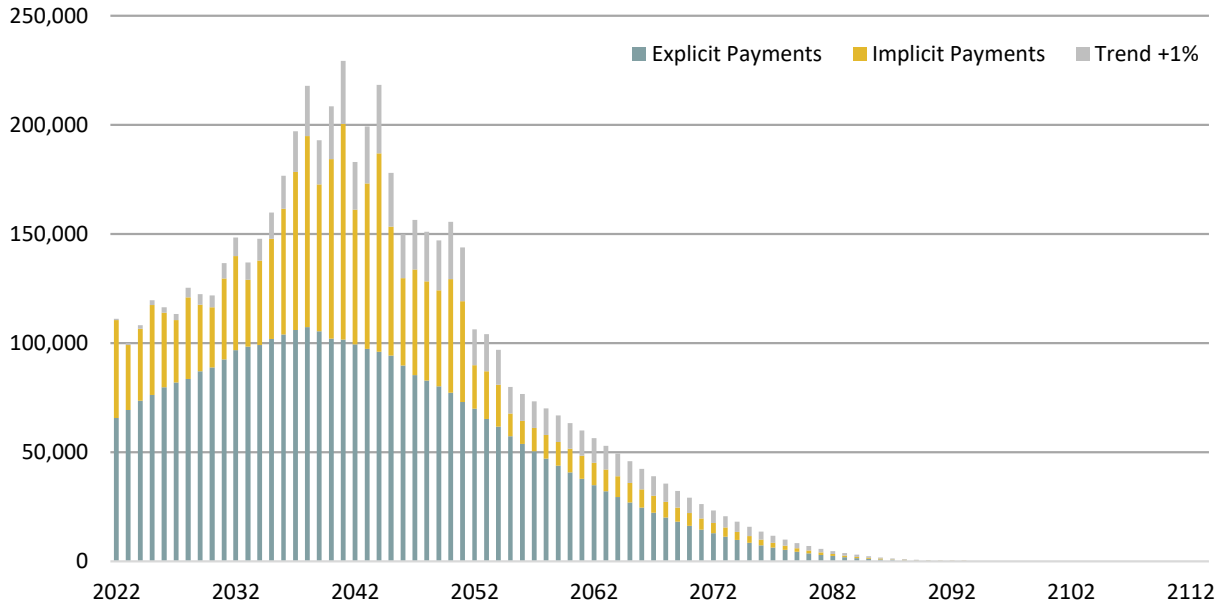
C. Valuation Results as of April 1, 2021

This section presents the basic results of our recalculation of the OPEB liability using the updated employee data, plan provisions and asset information provided to us for the April 2021 valuation. We described the general process for projecting all future benefits to be paid to retirees and current employees in the preceding Section. Expected annual benefits have been projected using the actuarial methods and assumptions outlined in Supporting Information, Section 3.

Healthcare benefits are paid for qualifying District retirees. Please see Supporting Information, Section 2 for details.

The following graph illustrates the annual other post-employment benefits projected to be paid on behalf of current retirees and current employees expected to retire from the District.

OPEB Payments
Projected to be Paid During Retirement to Current Employees and Retirees



The amounts shown in green reflect the expected payment by the District toward retiree medical, dental and vision premiums while those in yellow reflect the implicit subsidy benefits (i.e., the excess of retiree medical and prescription drug claims over the premiums expected to be charged during the year for retirees' coverage). The projections (in gray) reflect increases in benefit levels if healthcare trend were 1% higher.

The first 15 years of benefit payments from the graph above are shown in tabular form on page 19.

Liabilities relating to these projected benefits are shown beginning on the following page.

Valuation Results as of April 1, 2021
(Continued)

This chart compares the results measured as of June 30, 2020, based on the July 1, 2019, valuation, with the results measured as of June 30, 2021, based on the April 1, 2021, actuarial valuation.

Valuation Date	**7/1/2019**	**4/1/2021**		
Fiscal Year Ending	**6/30/2020**	**6/30/2021**		
Measurement Date	**6/30/2020**	**6/30/2021**		
Subsidy	Total	Explicit	Implicit	Total
Discount rate	6.15%	5.30%	5.30%	5.30%
Number of Covered Employees				
Actives	25	23		
Retirees	8	11		
Total Participants	33	34		
Actuarial Present Value of Projected Benefits				
Actives	$ 1,134,329	$ 758,774	$ 569,637	$ 1,328,411
Retirees	436,682	689,829	172,087	861,916
Total APVPB	1,571,011	1,448,603	741,724	2,190,327
Total OPEB Liability (TOL)				
Actives	816,627	486,154	309,660	795,814
Retirees	436,682	689,829	172,087	861,916
TOL	1,253,309	1,175,983	481,747	1,657,730
Fiduciary Net Position	983,572			1,150,585
Net OPEB Liability	269,737			507,145
Service Cost For the period following the measurement date	50,376	32,637	26,740	59,377

The Total OPEB Liability has increased by $404,421 from that reported one year ago. Part of the change was expected and some of this change was unexpected. Reasons for the change in the Total OPEB Liability (TOL) are discussed on the following page.

Valuation Results as of April 1, 2021
(Concluded)

Expected changes: We estimated that the TOL was expected to increase by $42,635 from normal plan operation. This includes additional service and interest costs accruals for the period, as developed in the prior valuation, and decreased by benefits paid to retirees.

Unexpected changes increased the TOL by $361,786, falling into one of the following categories:

- *Plan experience* recognizes results which are *different than expected* based on the prior valuation data and assumptions. We did not prepare the prior valuation, but from our analysis, we estimated plan experience to be slightly unfavorable, increasing the TOL by $99,602 from what was previously projected. We believe some of this change relates to demographic shifts within the ACWA-JPIA pool and some new retirements earlier than previously assumed.
- *Assumption changes* collectively increased the TOL by $262,184. The largest changes related to (a) updates to the assumed "demographic" assumptions; (b) the assumed return on trust assets; and (c) the change in methodology for developing age-based claims and on updated guidance in this area relating to the Actuarial Standard of Practice #6. Details of these changes are provided on the last page in Supporting Information, Section 3.
- *Benefit changes:* There were no changes reported since the prior valuation was completed.

This chart reconciles the TOL reported for fiscal year end June 30, 2020, to the TOL to be reported as of June 30, 2021.

Reported Total OPEB Liability at June 30, 2020 Measurement Date June 30, 2020	**$ 1,253,309**
Expected Changes:	
Service Cost	50,376
Benefit Payments	(85,295)
Interest Cost	77,554
Total Expected Change	42,635
Expected Total OPEB Liability at June 30, 2021 Measurement Date June 30, 2021	**$ 1,295,944**
Unexpected Changes:	
Plan experience different than assumed (estimated)	99,602
Assumption Changes	
Change in demographic assumptions and mortality improvement scale	(160,757)
Estimated change in age-based claims model and post-65 implicit	157,554
Change in discount rate (and long term asset return)	155,491
Change in healthcare trend model	39,967
Update assumed retiree participation (including in ACWA)	60,624
Increase in spouse coverage assumption	9,305
Total Unexpected Change	361,786
Actual Total OPEB Liability at June 30, 2021 Measurement Date June 30, 2021	**$ 1,657,730**

D. Accounting Information (GASB 75)

The following exhibits are designed to satisfy the reporting and disclosure requirements of GASB 75 for the fiscal year end June 30, 2021. The District is classified for GASB 75 purposes as a single employer.

Components of Net Position and Expense

The exhibit below shows the development of Net Position and Expense as of the Measurement Date.

Plan Summary Information for FYE June 30, 2021 *Measurement Date is June 30, 2021*	**Three Valleys Municipal Water District**
Items Impacting Net Position:	
Total OPEB Liability	$ 1,657,730
Fiduciary Net Position	1,150,585
Net OPEB Liability (Asset)	507,145
Deferred (Outflows) Inflows of Resources Due to:	
Assumption Changes	(171,098)
Plan Experience	(140,017)
Investment Experience	89,550
Deferred Contributions	-
Net Deferred (Outflows) Inflows of Resources	(221,565)
Impact on Statement of Net Position, FYE 6/30/2021	**$ 285,580**
Items Impacting OPEB Expense:	
Service Cost	$ 50,376
Cost of Plan Changes	-
Interest Cost	77,554
Expected Earnings on Assets	(59,334)
Recognized Deferred Resource items:	
Assumption Changes	22,279
Plan Experience	23,611
Investment Experience	(20,842)
OPEB Expense, FYE 6/30/2021	**$ 93,644**

Accounting Information
(Continued)

Change in Net Position During the Fiscal Year

The exhibit below shows the year-to-year changes in the components of Net Position.

For Reporting at Fiscal Year End *Measurement Date*	**6/30/2020** *6/30/2020*	**6/30/2021** *6/30/2021*	**Change During Period**
Total OPEB Liability	$ 1,253,309	$ 1,657,730	$ 404,421
Fiduciary Net Position	964,786	1,150,585	185,799
Net OPEB Liability (Asset)	288,523	507,145	218,622
Deferred Resource (Outflows) Inflows Due to:			
Assumption Changes	68,807	(171,098)	(239,905)
Plan Experience	(64,026)	(140,017)	(75,991)
Investment Experience	(16,073)	89,550	105,623
Deferred Contributions	-	-	-
Net Deferred (Outflows) Inflows	(11,292)	(221,565)	(210,273)
Impact on Statement of Net Position	$ 277,231	$ 285,580	$ 8,349

Change in Net Position During the Fiscal Year	
Impact on Statement of Net Position, FYE 6/30/2020	$ 277,231
OPEB Expense (Income)	93,644
Employer Contributions During Fiscal Year	(85,295)
Impact on Statement of Net Position, FYE 6/30/2021	$ 285,580

OPEB Expense	
Employer Contributions During Fiscal Year	$ 85,295
Deterioration (Improvement) in Net Position	8,349
OPEB Expense (Income), FYE 6/30/2021	$ 93,644

Accounting Information
(Continued)

Change in Fiduciary Net Position During the Measurement Period

	Three Valleys Municipal Water District
Fiduciary Net Position at Fiscal Year Ending 6/30/2020 *Measurement Date 6/30/2020*	**$ 964,786**
Changes During the Period:	
Investment Income	185,799
Employer Contributions	85,295
Benefit Payments	(85,295)
Net Changes During the Period	185,799
Fiduciary Net Position at Fiscal Year Ending 6/30/2021 *Measurement Date 6/30/2021*	**$ 1,150,585**

Expected Long-term Return on Trust Assets

In March 2021, PARS published an expected return of 5.89% for the Moderate Index Plus Portfolio, prior to offset for non-imbedded investment related fees. This expected return was determined using a building-block method and best-estimate ranges of expected future real rates of return for each major asset class (expected returns, net of OPEB plan investment expense and inflation). These ranges are combined to produce the long-term expected rate of return by weighting the expected future real rates of return by the target asset allocation percentage and by adding expected inflation. The target allocation and best estimates of geometric real rates of return for each major class are summarized in this table.

Portfolio (Investment Strategy)		Moderate
Asset Class	Expected Return	Weight
Equity		**50.00%**
Large Cap Core	6.80%	26.50%
Mid Cap Core	7.10%	5.00%
Small Cap Core	7.90%	7.50%
Real Estate	6.60%	1.75%
International	7.30%	6.00%
Emerging Markets	7.30%	3.25%
Fixed Income		**45.00%**
Short Term Bond	3.30%	10.00%
Intermediate Term Bond	3.90%	33.50%
High Yield	6.10%	1.50%
Alternatives		
Cash	2.40%	**5.00%**
Expected Return		5.89%
Expected Standard Deviation		8.24%

Non-imbedded fees were estimated to reduce the expected yield above by 60 basis points (0.60%), reducing the net expected return on trust assets to 5.29% per year. We rounded this to the nearest 10 basis points, resulting in a 5.3% assumed long-term return on trust assets.

Accounting Information
(Continued)

Recognition Period for Deferred Resources

Liability changes due to plan experience which differs from what was assumed in the prior measurement period and/or from assumption changes during the period are recognized over the plan's Expected Average Remaining Service Life ("EARSL"). The EARSL of 6.97 years is the period used to recognize such changes in the OPEB Liability arising during the current measurement period.

When applicable, changes in the Fiduciary Net Position due to investment performance different from the assumed earnings rate are always recognized over 5 years.

Liability changes attributable to benefit changes occurring during the period, if any, are recognized immediately.

Deferred Resources as of Fiscal Year End and Expected Future Recognition

The exhibit below shows deferred resources as of the fiscal year end June 30, 2021.

Three Valleys Municipal Water District	Deferred Outflows of Resources	Deferred Inflows of Resources
Changes of Assumptions	$ 349,282	$ 178,184
Differences Between Expected and Actual Experience	149,188	9,171
Net Difference Between Projected and Actual Earnings on Investments	-	89,550
Deferred Contributions	-	-
Total	$ 498,470	$ 276,905

In addition, future recognition of these deferred resources is shown below.

For the Fiscal Year Ending June 30	Recognized Net Deferred Outflows (Inflows) of Resources
2022	$ 25,016
2023	24,040
2024	24,354
2025	6,224
2026	78,355
Thereafter	63,576

Accounting Information
(Continued)

Sensitivity of Liabilities to Changes in the Discount Rate and Healthcare Cost Trend Rate

The discount rate used for accounting purposes for the fiscal year end 2021 is 5.3%. Healthcare Cost Trend Rate was assumed to start at 5.7% (increase effective January 1, 2022) and grade down to 4% for years 2076 and later. The impact of a 1% increase or decrease in these assumptions is shown in the chart below.

Sensitivity to:			
Change in Discount Rate	**Current - 1% 4.30%**	**Current 5.30%**	**Current + 1% 6.30%**
Total OPEB Liability	1,834,191	1,657,730	1,506,668
Increase (Decrease)	176,461		(151,062)
% Increase (Decrease)	10.6%		-9.1%
Net OPEB Liability (Asset)	683,606	507,145	356,083
Increase (Decrease)	176,461		(151,062)
% Increase (Decrease)	34.8%		-29.8%
Change in Healthcare Cost Trend Rate	**Current Trend - 1%**	**Current Trend**	**Current Trend + 1%**
Total OPEB Liability	1,567,565	1,657,730	1,760,172
Increase (Decrease)	(90,165)		102,442
% Increase (Decrease)	-5.4%		6.2%
Net OPEB Liability (Asset)	416,980	507,145	609,587
Increase (Decrease)	(90,165)		102,442
% Increase (Decrease)	-17.8%		20.2%

Accounting Information
(Continued)

Schedule of Changes in the District's Net OPEB Liability and Related Ratios

GASB 75 requires presentation of the 10-year history of changes in the Net OPEB Liability. Only results for years since GASB 75 was implemented (fiscal years 2017 through 2021) are shown in the table.

Fiscal Year Ending	2021	2020	2019	2018	2017
Measurement Date	6/30/2021	6/30/2020	6/30/2019	6/30/2018	6/30/2017
Discount Rate on Measurement Date	5.30%	6.15%	6.15%	6.15%	7.50%
Total OPEB liability					
Service Cost	$ 50,376	$ 48,909	$ 35,365	$ 34,335	$ 22,989
Interest	77,554	73,742	84,221	65,379	63,032
Changes of benefit terms	-	-	-	-	-
Differences between expected and actual experience	99,602	(13,757)	-	110,332	-
Changes of assumptions	262,184	(267,276)	-	140,935	143,737
Benefit payments	(85,295)	(53,555)	(47,588)	(41,611)	(23,007)
Net change in total OPEB liability	404,421	(211,937)	71,998	309,370	206,751
Total OPEB liability - beginning	1,253,309	1,465,246	1,393,247	1,083,877	877,126
Total OPEB liability - ending (a)	$ 1,657,730	$ 1,253,309	$ 1,465,245	$ 1,393,247	$ 1,083,877
Plan fiduciary net position					
Contributions - employer	$ 85,295	$ 53,555	$ 47,588	$ 41,611	$ 138,561
Net investment income	185,799	38,250	55,386	45,031	52,341
Benefit payments	(85,295)	(53,555)	(47,588)	(41,611)	(23,007)
Administrative Expense	-	(2,353)	(2,212)	(2,158)	(1,157)
Net change in plan fiduciary net position	185,799	35,897	53,174	42,873	166,738
Plan fiduciary net position - beginning	964,786	928,889	875,715	832,842	666,104
Plan fiduciary net position - ending (b)	$ 1,150,585	$ 964,786	$ 928,889	$ 875,715	$ 832,842
Net OPEB liability - ending (a) - (b)	$ 507,145	$ 288,523	$ 536,357	$ 517,532	$ 251,035
Covered-employee payroll	$ 2,863,454	$ 2,743,774	$ 2,750,395	$ 2,662,296	$ 2,539,815
Net OPEB liability as a % of covered-employee payroll	17.71%	10.52%	19.50%	19.44%	9.88%

Accounting Information
(Continued)

Schedule of Contributions

This chart shows the Actuarially Determined Contributions since GASB 75 was implemented*.

Fiscal Year Ending	2021	2020	2019	2018	2017
Actuarially Determined Contribution	$ 83,411	$ 38,993	$ 47,588	$ 41,611	$ 39,410
Contributions in relation to the actuarially determined contribution	85,295	48,157	30,971	27,470	39,410
Contribution deficiency (excess)	$ (1,884)	$ (9,164)	$ 16,617	$ 14,141	$ -
Covered employee payroll	$ 2,863,454	$ 2,743,774	$ 2,750,395	$ 2,662,296	$ 2,539,815
Contributions as a percentage of covered employee payroll	2.98%	1.42%	1.73%	1.56%	1.55%

Notes to Schedule

Valuation Date Used to Determine ADC	4/1/2021	7/1/2019	7/1/2017	7/1/2015
Actuarial cost method	Entry Age Normal Level % of pay	Entry Age Normal Level % of pay	Entry Age Normal Level % of pay	Entry Age Normal Level % of pay
Amortization method	Level % of Pay 30 yrs closed	Level % of Pay 30 yrs closed	Level % of Pay 30 yrs closed	Level % of Pay 30 yrs closed
Amortization period	30 Yrs remain	Not available	Not available	Not available
Asset valuation method	Market Value	Market Value	Market Value	Market Value
Inflation	2.50%	2.25%	2.75%	Not available
Healthcare cost trend rates	5.7% in 2022 down to 4% by 2076 in periodic steps of .1	6.0% in 2019 down to 4.5% by 2022 in steps of .5	5.5% in 2019, 5% for all later years	6.0% in 2019 down to 4.5% by 2022 in steps of .8
Salary increases	3.00%	3.00%	3.00%	2.75%
Investment rate of return	5.30%	6.15%	6.15%	7.28%
Retirement age	CalPERS: From 50 to 75	From 50 to 65	2014 CalPERS OPEB Assumptions Model	50-63 for 2% at 55; 52-67 for 2% at 62
Mortality	CalPERS 2017 Experience Study	RP-2014 Healthy Annuitant	CalPERS 2014 Experience Study	CalPERS 2014 Experience Study
Mortality Improvement	MW Scale 2020 generationally	Generational projection based on graded % of scale MP-2016	20 years Scale BB; see CalPERS 2014 experience study report	20 years Scale BB; see CalPERS 2014 experience study report

* Information for fiscal years ended 2017 through 2020, including the ADCs, were taken from the Required Supplementary Information section of the District fiscal year end audited financial statements for those years.

Accounting Information
(Continued)

Detail of Changes to Net Position

The chart below details changes to all components of Net Position.

Three Valleys Municipal Water District	Total OPEB Liability (a)	Fiduciary Net Position (b)	Net OPEB Liability (c) = (a) - (b)	(d) Deferred Outflows (Inflows) Due to:				Impact on Statement of Net Position (e) = (c) - (d)
				Assumption Changes	Plan Experience	Investment Experience	Deferred Contributions	
Balance at Fiscal Year Ending 6/30/2020 *Measurement Date 6/30/2020*	$ 1,253,309	$ 964,786	$ 288,523	$ (68,807)	$ 64,026	$ 16,073	$ -	$ 277,231
Changes During the Period:								
Service Cost	50,376		50,376					50,376
Interest Cost	77,554		77,554					77,554
Expected Investment Income		59,334	(59,334)					(59,334)
Employer Contributions		85,295	(85,295)					(85,295)
Changes of Benefit Terms	-		-					-
Benefit Payments	(85,295)	(85,295)	-					-
Assumption Changes	262,184		262,184	262,184				-
Plan Experience	99,602		99,602		99,602			-
Investment Experience		126,465	(126,465)			(126,465)		-
Recognized Deferred Resources				(22,279)	(23,611)	20,842		25,048
Employer Contributions in Fiscal Year								-
Net Changes in Fiscal Year 2020-2021	404,421	185,799	218,622	239,905	75,991	(105,623)	-	8,349
Balance at Fiscal Year Ending 6/30/2021 *Measurement Date 6/30/2021*	$ 1,657,730	$ 1,150,585	$ 507,145	$ 171,098	$ 140,017	$ (89,550)	$ -	$ 285,580

Accounting Information
(Continued)

Schedule of Deferred Outflows and Inflows of Resources

A listing of all deferred resource bases used to develop the Net Position and OPEB Expense is shown below. Deferred Contributions are not shown.

Measurement Date: June 30, 2021

Deferred Resource						Recognition of Deferred Outflow or Deferred (Inflow) in Measurement Period:						
Date Created	Cause	Initial Amount	Period (Yrs)	Annual Recognition	Balance as of Jun 30, 2021	2020-21 (FYE 2021)	2021-22 (FYE 2022)	2022-23 (FYE 2023)	2023-24 (FYE 2024)	2024-25 (FYE 2025)	2025-26 (FYE 2026)	Thereafter
6/30/2017	Loss Due To Assumption Changes	$ 114,989	8.00	$ 14,374	$ 43,119	$ 14,374	$ 14,374	$ 14,374	$ 14,371	$ -	$ -	$ -
6/30/2017	Investment Earnings Less than Expected	146	5.00	29	-	30	-	-	-	-	-	-
6/30/2018	Investment Earnings Less than Expected	4,898	5.00	980	978	980	978	-	-	-	-	-
6/30/2019	Loss Due To Plan Experience	98,718	8.50	11,614	63,876	11,614	11,614	11,614	11,614	11,614	11,614	5,806
6/30/2019	Loss Due To Assumption Changes	126,100	8.50	14,835	81,595	14,835	14,835	14,835	14,835	14,835	14,835	7,420
6/30/2019	Investment Earnings Greater than Expected	(1,598)	5.00	(320)	(638)	(320)	(320)	(318)	-	-	-	-
6/30/2020	Gain Due To Plan Experience	(13,757)	6.00	(2,293)	(9,171)	(2,293)	(2,293)	(2,293)	(2,293)	(2,292)	-	-
6/30/2020	Gain Due To Assumption Changes	(267,276)	6.00	(44,546)	(178,184)	(44,546)	(44,546)	(44,546)	(44,546)	(44,546)	-	-
6/30/2020	Investment Earnings Less than Expected	18,804	5.00	3,761	11,282	3,761	3,761	3,761	3,760	-	-	-
6/30/2021	Loss Due To Plan Experience	99,602	6.97	14,290	85,312	14,290	14,290	14,290	14,290	14,290	14,290	13,862
6/30/2021	Loss Due To Assumption Changes	262,184	6.97	37,616	224,568	37,616	37,616	37,616	37,616	37,616	37,616	36,488
6/30/2021	Investment Earnings Greater than Expected	(126,465)	5.00	(25,293)	(101,172)	(25,293)	(25,293)	(25,293)	(25,293)	(25,293)	-	-

Accounting Information
(Continued)

District Contributions to the Plan

District contributions to the Plan occur as benefits are paid to or on behalf of retirees. Benefit payments may occur in the form of direct payments for premiums ("explicit subsidies") and/or indirect payments to retirees in the form of higher premiums for active employees ("implicit subsidies"). Note that the implicit subsidy contribution does not represent cash payments to retirees, but rather the reclassification of a portion of active healthcare expense to be recognized as a retiree healthcare cost. For details, see Addendum 1 – Important Background Information.

OPEB contributions paid by the District in the form of benefit payments during the measurement period are shown below. There are no deferred contributions since the measurement period is the current fiscal year.

Employer Contributions During the Measurement Period, Jul 1, 2020 thru Jun 30, 2021	**Three Valleys Municipal Water District**
Employer Contributions to the Trust	$ -
Employer Contributions in the Form of Direct Benefit Payments (not reimbursed by trust)	50,462
Implicit contributions	34,833
Total Employer Contributions During the Measurement Period	$ 85,295

Accounting Information
(Continued)

Projected Benefit Payments (15-year projection)

The following is an estimate of other post-employment benefits to be paid on behalf of current retirees and current employees expected to retire from the District. Expected annual benefits have been projected on the basis of the actuarial assumptions outlined in Section 3.

These projections do not include any benefits expected to be paid on behalf of current active employees *prior to* retirement, nor do they include any benefits for potential *future employees* (i.e., those who might be hired in future years).

Projected Annual Benefit Payments							
Fiscal Year Ending June 30	Explicit Subsidy			Implicit Subsidy			Total
	Current Retirees	Future Retirees	Total	Current Retirees	Future Retirees	Total	
2021	$ 50,462	$ -	$ 50,462	$ 34,833	$ -	$ 34,833	$ 85,295
2022	57,724	3,532	61,256	34,833	1,745	36,578	97,834
2023	57,974	7,727	65,701	40,331	4,491	44,822	110,523
2024	57,401	11,831	69,232	21,650	8,186	29,836	99,068
2025	56,784	16,837	73,621	24,657	8,322	32,979	106,600
2026	56,080	20,284	76,364	27,945	13,054	40,999	117,363
2027	55,008	24,877	79,885	14,883	19,115	33,998	113,883
2028	53,877	28,148	82,025	7,373	21,050	28,423	110,448
2029	51,454	32,225	83,679	8,551	28,641	37,192	120,871
2030	50,478	36,616	87,094	9,798	20,626	30,424	117,518
2031	49,426	39,438	88,864	1,547	26,004	27,551	116,415
2032	48,299	44,214	92,513	1,796	35,365	37,161	129,674
2033	47,096	49,627	96,723	2,027	41,177	43,204	139,927
2034	45,580	52,742	98,322	2,233	28,557	30,790	129,112
2035	43,911	55,154	99,065	2,402	36,456	38,858	137,923

The amounts shown in the Explicit Subsidy section of the table reflect the expected payment by the District toward retiree medical, dental and vision premiums in each of the years shown.

The amounts shown in the Implicit Subsidy table reflect the expected excess of retiree medical and prescription drug claims over the premiums expected to be charged during the year for retirees' coverage for those retirees remaining on a medical plan offered by the District.

Accounting Information
(Concluded)

Sample Journal Entries

Beginning Account Balances As of the fiscal year beginning 7/1/2020	**Debit**	**Credit**
Net OPEB Liability		288,523
Deferred Resource -- Assumption Changes		68,807
Deferred Resource -- Plan experience	64,026	
Deferred Resource -- Investment Experience	16,073	
Deferred Resource -- Contributions	-	
Net Position	277,231	

** The entries above assume nothing is on the books at the beginning of the year. So to the extent that values already exist in, for example, the Net OPEB Liability account, then only the difference should be adjusted. The entries above represent the values assumed to exist at the start of the fiscal year.*

Journal entry to recharacterize retiree benefit payments not reimbursed by a trust, and record cash contributions to the trust during the fiscal year	**Debit**	**Credit**
OPEB Expense	50,462	
Premium Expense		50,462
OPEB Expense	-	
Cash		-

** This entry assumes a prior journal entry was made to record the payment for retiree premiums. This entry assumes the prior entry debited an account called "Premium Expense" and credited Cash. This entry reverses the prior debit to "Premium Expense" and recharacterizes that entry as an "OPEB Expense". Also, the entry for cash contributions to the trust is shown.*

Journal entries to record implicit subsidies during the fiscal year	**Debit**	**Credit**
OPEB Expense	34,833	
Premium Expense		34,833

** This entry assumes that premiums for active employees were recorded to an account called "Premium Expense". This entry reverses the portion of premium payments that represent implicit subsidies and assigns that value to OPEB Expense.*

Journal entries to record other account activity during the fiscal year	**Debit**	**Credit**
Net OPEB Liability		218,622
Deferred Resource -- Assumption Changes	239,905	
Deferred Resource -- Plan experience	75,991	
Deferred Resource -- Investment Experience		105,623
Deferred Resource -- Contributions	-	
OPEB Expense	8,349	

E. Funding Information

The employer's OPEB funding policy and level of contributions to an irrevocable OPEB trust directly affects the discount rate which is used to calculate the OPEB liability to be reported in the employer's financial statements. Prefunding (setting aside funds to accumulate in an irrevocable OPEB trust) has certain advantages, one of which is the ability to (potentially) use a higher discount rate in the determination of liabilities for GASB 75 reporting purposes. Prefunding also improves the security of benefits for current and potential future recipients and contributes to intergenerational taxpayer equity by better matching the cost of the benefits to the service years in which they are "earned" and which correspond to years in which taxpayers benefit from those services.

Paying Down the UAAL

Once an employer decides to prefund, a decision must be made about how to pay for benefits related to accumulated prior service that have not yet been funded (the UAAL[1]). This is most often, though not always, handled through structured amortization payments. The period and method chosen for amortizing this unfunded liability can significantly affect the Actuarially Determined Contribution (ADC) or other basis selected for funding the OPEB program.

Much like paying off a mortgage, when the AAL exceeds plan assets, choosing a longer amortization period to pay off the UAAL means smaller payments, but the payments will be required for more years; plan investments will have less time to work toward helping reduce required contribution levels. When the plan is in a surplus position, the reverse is true, and a longer amortization period may be preferable.

There are several ways the amortization payment can be determined. The most common methods are calculating the amortization payment as a level dollar amount or as a level percentage of payroll. The employer might also choose to apply a shorter period when the UAAL only when it is positive, i.e., when trust assets are lower than the AAL, but opt for a longer period or to exclude amortization of a negative UAAL, when assets exceed the AAL. The entire UAAL may be amortized as one single component or may be broken into multiple components reflecting the timing and source of each change, such as those arising from assumption changes, benefit changes and/or liability or investment experience.

The amortization period(s) should not exceed the number of years which would allow current trust assets plus future contributions and earnings to be sufficient to pay all future benefits and trust expenses each year. Prefunding of OPEB is optional and contributions at any level are permitted. However, if trust sufficiency is not expected, a discount rate other than the assumed trust return will likely be required for accounting purposes.

Funding and Prefunding of the Implicit Subsidy

An implicit subsidy liability is created when retiree medical claims are expected to exceed the premiums charged for retiree coverage. Recognition of the estimated implicit subsidy each year is handled by an accounting entry, reducing the amount paid for active employees and shifting that amount to be treated as a retiree healthcare expense/contribution (see Sample Journal Entries). The implicit subsidy is a true benefit to the retiree but can be difficult to see when medical premiums are set as a flat rate for both actives and pre-Medicare retirees. This might lead some employers to believe the benefit is not real or is merely an accounting construct, and thus to forgo prefunding of retiree implicit benefits.

[1] We use actuarial, rather than accounting, terminology to describe the components used to develop the ADCs.

OPEB Funding Information
(Continued)

Consider what would happen if the retiree premiums were based only on expected retiree claims experience. Almost certainly, retiree premiums would increase while premiums for active employees would go down if the active premiums no longer had to help support the higher retiree claims. *Who would pay the increases in retiree premiums*? Current plan documents and bargaining agreements would have to be consulted. Depending on circumstances, the increase in retiree premiums might remain the responsibility of the employer, pass entirely to the retirees, or some blending of the two. The answer would determine whether separate retiree-only premium rates would result in a higher or lower employer OPEB liability. In the current premium structure, with blended active and pre-Medicare retiree premiums, the employer is clearly, though indirectly, paying the implicit retiree cost.

The prefunding decision is complex. OPEB materiality, budgetary concerns, desire to use the full trust rate in developing the liability for GASB 75, and other factors must be weighed by each employer. Since prefunding OPEB benefits is not required, each employer's OPEB prefunding strategy will depend on how they balance these competing perspectives.

Development of the Actuarially Determined Contributions

The prior (June 30, 2019) valuation report prepared by Pacific Crest Actuaries did not include illustration of Actuarially Determined Contributions. Subject to the District's approval, we developed ADCs based on the following two components, adjusted with interest from the valuation date to fiscal year end:

- The amounts attributed to service performed in the current fiscal year (the normal cost) and
- Amortization of the unfunded actuarial accrued liability over a closed 30-year period on a level percentage of pay basis; 30 years remain on June 30, 2021.

Actuarially Determined Contributions, developed as described above for the District's fiscal years ending June 30, 2021, 2022 and 2023 are shown the exhibit on the next page. *By definition,* these ADCs incorporate both explicit (cash benefit) and implicit subsidy benefit liabilities. Contributions credited toward meeting the ADC will be comprised of:

1) direct payments to insurers toward retiree premiums, to the extent not later reimbursed to the District by the trust; plus
2) each year's implicit subsidy payment; and
3) contributions to the OPEB trust.

ADCs determined on this basis should provide for trust sufficiency, based on the current plan provisions and census data, *provided all assumptions are exactly realized and if the District contributes 100% or more of the ADC each year*. When an agency consistently funds the trust at or above the ADC, the expected long-term trust return may be used as the discount rate in determining the plan liability for accounting purposes. Trust sufficiency cannot be guaranteed to a certainty, however, because of the non-trivial risk that the assumptions used to project future benefit liabilities may not be realized.

OPEB Funding Information
(Continued)

Actuarially Determined Contributions for fiscal years ending June 30, 2021, 2022 and 2023 are below.

Funding Policy	**Prefunding Basis**		
Valuation date	**6/30/2021**		
For fiscal year ending	6/30/2021	6/30/2022	6/30/2023
Expected long-term return on assets	5.30%	5.30%	5.30%
Discount rate	5.30%	5.30%	5.30%
Number of Covered Employees			
Actives	23		
Retirees	11		
Total Participants	34		
Actuarial Present Value of Projected Benefits			
Actives	$ 1,328,411	$ 1,398,817	$ 1,467,538
Retirees	947,211	909,858	863,071
Total APVPB	2,275,622	2,308,675	2,330,609
Actuarial Accrued Liability (AAL)			
Actives	736,437	837,992	941,388
Retirees	947,211	909,858	863,071
Total AAL	1,683,648	1,747,850	1,804,459
Actuarial Value of Assets	1,150,585	1,211,566	1,263,556
Unfunded AAL (UAAL)	533,063	536,284	540,903
UAAL Amortization method	Level % of Pay	Level % of Pay	Level % of Pay
Remaining amortization period (years)	30	29	28
Amortization Factor	22.1797	21.6526	21.1138
Actuarially Determined Contribution (ADC)			
Normal Cost	$ 59,377	$ 61,158	$ 62,992
Amortization of UAAL	24,034	24,768	25,619
Interest to fiscal year end	-	-	-
Total ADC	83,411	85,926	88,611

Note: the AAL above is as of 4/1/21 as applied to determine the ADC, which differs from the TOL.

As explained on the preceding page, OPEB funding consists of 3 different sources. The charts below illustrate how and where these 3 contribution sources apply toward satisfying the ADC.

If the employer wants to contribute 100% of the ADC, start with this:

1 Implicit subsidy contribution	$ 34,833	$ 36,578	$ 44,822
Additional payments needed to meet ADC	70,731	73,243	68,431

Estimated employer payments for retiree premiums and trust contributions to complete full ADC funding:

2 Projected agency paid premiums for retirees	50,462	61,256	65,701
3 Expected agency contribution to OPEB trust	-	(11,908)	(21,912)
Total Expected Employer Contributions (1+2+3)	**$ 85,295**	**$ 85,926**	**$ 88,611**

F. Certification

The purpose of this report is to provide actuarial information of the other postemployment benefits (OPEB) provided by the Three Valleys Municipal Water District (the District) in compliance with Statement 75 of the Governmental Accounting Standards Board (GASB 75). We summarized the benefits in this report and our calculations were based on our understanding of the benefits as described herein.

In preparing this report we relied without audit on information provided by the District. This information includes, but is not limited to, plan provisions, census data, and financial information. We performed a limited review of this data and found the information to be reasonably consistent. The accuracy of this report is dependent on this information and if any of the information we relied on is incomplete or inaccurate, then the results reported herein will be different from any report relying on more accurate information.

We consider the actuarial assumptions and methods used in this report to be individually reasonable under the requirements imposed by GASB 75 and taking into consideration reasonable expectations of plan experience. The results provide an estimate of the plan's financial condition at one point in time. Future actuarial results may be significantly different due to a variety of reasons including, but not limited to, demographic and economic assumptions differing from future plan experience, changes in plan provisions, changes in applicable law, or changes in the value of plan benefits relative to other alternatives available to plan members.

Alternative assumptions may also be reasonable; however, demonstrating the range of potential plan results based on alternative assumptions was beyond the scope of our assignment except to the limited extent required by GASB 75 and in accordance with the District's stated OPEB funding policy. Results for accounting purposes may be materially different than results obtained for other purposes such as plan termination, liability settlement, or underlying economic value of the promises made by the plan.

This report is prepared solely for the use and benefit of the District and may not be provided to third parties without prior written consent of MacLeod Watts. Exceptions are: the District may provide copies of this report to their professional accounting and legal advisors who are subject to a duty of confidentiality, and the District may provide this work to any party if required by law or court order. No part of this report should be used as the basis for any representations or warranties in any contract or agreement without the written consent of MacLeod Watts.

The undersigned actuaries are unaware of any relationship that might impair the objectivity of this work. Nothing within this report is intended to be a substitute for qualified legal or accounting counsel. Both actuaries are members of the American Academy of Actuaries and meet the qualification standards for rendering this opinion.

Signed: August 25, 2021

Catherine L. MacLeod, FSA, FCA, EA, MAAA

Raegann E. Conner, Actuarial Analyst

G. Supporting Information

Section 1 - Summary of Employee Data

Active employees: The District reported 23 active members in the data provided to us for the April 2021 valuation. Of the 23 active members, 19 were enrolled in the District's medical program and 4 were waiving coverage.

Distribution of Benefits-Eligible Active Employees								
	Years of Service							
Current Age	Under 1	1 to 4	5 to 9	10 to 14	15 to 19	20 & Up	Total	Percent
Under 25							0	0%
25 to 29							0	0%
30 to 34		1	1				2	9%
35 to 39		2	1				3	13%
40 to 44		2	1	1			4	17%
45 to 49		1		2		1	4	17%
50 to 54		2		1		1	4	17%
55 to 59			1	1	2		4	17%
60 to 64				1		1	2	9%
65 to 69							0	0%
70 & Up							0	0%
Total	0	8	4	6	2	3	**23**	**100%**
Percent	0%	35%	17%	26%	9%	13%	**100%**	

Valuation	July 2019	April 2021
Average Attained Age for Actives	48.0	47.9
Average Years of Service	10.0	10.0

Retirees: There were 11 retirees receiving benefits as of the April 2021 valuation date. Of these, 7 had continued their medical coverage through the District while 4 chose other (outside) coverage and are receiving partial or full premium reimbursements from the District. Their ages are summarized below.

Those with outside coverage create no implicit subsidy liability for the District.

Retirees by Age				
Current Age	District Plan	Outside Plan	Total	Percent
Below 50			0	0%
50 to 54			0	0%
55 to 59	1	1	2	18%
60 to 64	2		2	18%
65 to 69	2	1	3	27%
70 to 74	1	1	2	18%
75 to 79	1	1	2	18%
80 & up			0	0%
Total	**7**	**4**	**11**	**100%**
Average Age:				
On 4/1/2021	67.0	69.4	67.8	
At retirement	61.6	61.1	61.4	

Supporting Information
(Continued)

Section 1 - Summary of Employee Data

The chart below reconciles the number of actives and retirees included in the July 2019 valuation of the District plan with those included in the April 2021 valuation.

Comparison of District Plan Members Between Valuation Dates			
Status	Covered Actives	Covered Retirees	Total
Number reported as of July 1, 2019	25	8	33
Number reported as of April 1, 2021	23	11	34
Difference	-2	3	1

Four (4) of the current retirees have benefits limited to $355 per month, having retired prior to January 1, 2015. The other seven (7) retirees could potentially receive benefits up to $600 per month.

Summary of Plan Member Counts: The numbers of those members currently or potentially eligible to receive benefits under the OPEB plan are required to be reported in the notes to the financial statements.

Summary of Plan Member Counts	
Number of active plan members	23
Number of inactive plan members currently receiving benefits	11
Number of inactive plan members entitled to but not receiving benefits	0*

** We are not aware of any retirees who are eligible but not receiving benefits.*

Supporting Information
(Continued)

Section 2 - Summary of Retiree Benefit Provisions

OPEB provided: The District reported that it offers lifetime retiree medical coverage and pays a limited amount toward post-retirement healthcare costs for qualifying retirees. Employees qualify upon reaching age 50, achieving at least 10 years of District service, and retiring from the District.

Access to coverage: Medical, dental and vision coverage is currently provided through ACWA – JPIA. Retirees may continue medical coverage through the District or may instead choose other (non-District) medical coverage and still receive the benefit described below. Retirees *may not* continue dental or vision coverage through the District.

Retiree Health Benefits provided: The District pays a portion of each retiree's healthcare costs. The maximum monthly benefit provided is based on the employee's retirement date, their employment date and the retiree's years of District service, as shown in the two charts below:

Maximum Monthly Benefit	
Retired prior to January 1, 2015	$ 355
Retired on or after January 1, 2015	$ 600

While there is no imminent intent to increase the maximum monthly benefit, should a change be made in the future, the new benefit maximum would be for employees retiring after the effective date of the change. The maximum payable to current retirees would not change.

Percent of Cap		
District Years of Service	Hired before January 1, 2005 (Tier I)	Hired on/after January 1, 2005 (Tier II)
10	50%	50%
11	60%	55%
12	70%	60%
13	80%	65%
14	90%	70%
15	100%	75%
16	100%	80%
17	100%	85%
18	100%	90%
19	100%	95%
20+	100%	100%

The maximum monthly amount paid by the District for a specific retiree is *the lesser of*:

(a) The applicable maximum monthly benefit, based on retirement date, from the chart on the left *multiplied by* the percentage of the cap in the chart on the right, determined from the retiree's years of District service and taken from the column corresponding to the employment date.

(b) The retiree's actual monthly healthcare costs.

Actual costs may include District or non-District medical premiums, non-District dental and/or vision premiums, Medicare Part B and/or Medicare Advantage or Supplemental plan premiums. Retirees requesting reimbursement for costs other than District medical premiums must provide periodic documentation of expenses incurred.

Employees who retired before December 5, 2018, may apply a portion of their benefit amount only toward single party medical coverage. Employees retiring on or after December 5, 2018, may also apply their benefit amount toward retiree only dental and vision premiums.

Supporting Information
(Continued)

Section 2 - Summary of Retiree Benefit Provisions

Dependent Coverage: The District does not pay any portion of healthcare costs for retiree dependents. Employees who retire on or after January 1, 2015, may cover their spouse or other dependents on the District's medical plan by paying the 100% of the additional dependent premiums.

Medical premium rates: The 2021 monthly healthcare premium rates were used to prepare the April 2021 valuation. These rates are shown below:

ACWA LA 2021 Monthly Medical Premium Rates				
	Active & Pre-MCare Retirees		Medicare Eligible Retirees	
Plan	Employee Only	Employee & Spouse	Employee Only	Employee & Spouse
Anthem Blue Cross CalCare HMO	$ 857.69	$ 1,715.38	$ 649.52	$ 1,299.04
Anthem Blue Cross Classic PPO	843.42	1,686.85	570.23	1,140.46
Anthem Blue Cross CDHP	674.74	1,349.48	456.19	912.37
Kaiser HMO with Chiro	697.92	1,378.84	193.74	370.48

Supporting Information
(Continued)

Section 3 - Actuarial Methods and Assumptions

The ultimate real cost of an employee benefit plan is the value of all benefits and other expenses of the plan over its lifetime. These payments depend only on the terms of the plan and the administrative arrangements adopted. The actuarial assumptions are used to estimate the cost of these benefits; the funding method spreads the expected costs on a level basis over the life of the plan.

Important Dates

Fiscal Year End	June 30, 2021
GASB 75 Measurement Date	Last day of the current fiscal year (June 30, 2021)
Valuation Date	April 1, 2021

Valuation Methods

Funding Method	Entry Age Normal Cost, level percent of pay
Asset Valuation Method	Market value of assets
Participants Valued	Only current active employees and retired participants and covered dependents are valued. No future employees are considered in this valuation.
Development of Age-related Medical Premiums	Actual premium rates for retirees and their spouses were adjusted to an age-related basis by applying medical claim cost factors developed from the data presented in the report, "Health Care Costs – From Birth to Death", sponsored by the Society of Actuaries. Refer to MacLeod Watts's Age Rating Methodology provided in Addendum 2 for details. The monthly baseline premium costs were set equal to the active employee-only premiums shown in the premium chart in Section 2. Representative claims costs derived for retirees covered or expected to be covered by a District medical plan offered through ACWA-JPIA are shown below.

Expected Monthly Claims by Medical Plan for Selected Ages

	Male						
Medical Plan	50	55	60	65	70	75	80
Anthem Blue Cross CalCare HMO	$ 848	$1,107	$1,390	$ 602	$ 675	$ 733	$ 768
Anthem Blue Cross Classic PPO	658	859	1,079	467	524	569	596
Anthem Blue Cross CDHP	698	911	1,144	496	555	603	632
Kaiser HMO with Chiro	945	1,233	1,549	170	191	207	217
	Female						
Medical Plan	50	55	60	65	70	75	80
Anthem Blue Cross CalCare HMO	$1,051	$1,214	$1,384	$ 577	$ 653	$ 707	$ 738
Anthem Blue Cross Classic PPO	816	942	1,074	448	506	548	573
Anthem Blue Cross CDHP	865	999	1,139	475	537	581	607
Kaiser HMO with Chiro	1,171	1,352	1,542	163	184	199	208

Supporting Information
(Continued)

Section 3 - Actuarial Methods and Assumptions

Economic Assumptions

Long term return on trust assets	5.3%, net of trust investment and administrative fees
Discount Rate	5.3% as of June 30, 2021 and 6.15% as of June 30, 2020
General Inflation Rate	2.5% per year
Salary Increase	3.0% per year; since benefits do not depend on salary, this is used to allocate the cost of benefits between service years.
Healthcare Trend	Medical plan premiums and claims costs by age are assumed to increase once each year. Increases over the prior year's levels were derived using the Getzen model and are assumed to be effective on the dates shown below:

Effective January 1	Premium Increase	Effective January 1	Premium Increase
2022	5.7%	2067	4.7%
2023	5.6%	2068	4.6%
2024	5.5%	2069	4.5%
2025-2026	5.4%	2070-2071	4.4%
2027-2029	5.3%	2072	4.3%
2030-2051	5.2%	2073-2074	4.2%
2052	5.1%	2075	4.1%
2053-2055	5.0%	2076	4.0%
2056-2060	4.9%	& later	4.0%
2061-2066	4.8%		

The healthcare trend shown above was developed using the Getzen Model 2021_b published by the Society of Actuaries using the following settings: CPI 2.5%; Real GDP Growth 1.5%; Excess Medical Growth 1.2%; Expected Health Share of GDP in 2028 20.3%; Resistance Point 25%; Year after which medical growth is limited to growth in GDP 2075.

Medicare Eligibility	Absent contrary data, all individuals are assumed to be eligible for Medicare Parts A and B at age 65.
Employer Cost Sharing	Following discussion with the District, we have assumed that the maximum monthly benefit levels will remain fixed at their current levels in all future years.[2]

[2] While unable to verify to a certainty, the District believes that the prior actuarial reports did not include any assumption for the maximum benefit levels to increase.

Supporting Information
(Continued)

Section 3 - Actuarial Methods and Assumptions

Participant Election Assumptions

Retiree participation rates

Active employees and current retirees: All current retirees and all (100% of) future employees who meet the OPEB eligibility requirements and retire from the District are assumed to receive the retiree health benefits for their lifetime.

Retiree medical plan election

Active employees: (a) If currently electing non-District medical coverage, we assume the employee will elect non-District coverage in retirement.

(b) If currently enrolled in a District medical (ACWA-JPIA) plan, we assume Tier 1 employees continue their current plan in retirement at these percentages before and after age 65:

	Before Age 65	Age 65 or older
Anthem BC CDHP	80%	25%
Anthem BC HMO	50%	10%
Anthem BC PPO	50%	10%
Kaiser HMO	80%	75%

(c) Currently enrolled Tier 2 active employees are assumed to continue their current plan election in retirement using the same percentages above but further multiplied by the percentage shown in the chart below, based on their years of District service:

Years of District Service	Assumed % Participation
Under 10	0%
10	75%
11	80%
12	85%
13	90%
14	95%
15 or more	100%

Current retirees under age 65: Current ACWA or outside medical plan elections are assumed to continue until the retiree reaches age 65. On reaching age 65, we assume that the percentages shown above for future retirees after age 65 will apply.

Current retirees now age 65 and older: Those on the ACWA Kaiser Sr. Advantage plan and those with non-District ("outside") medical coverage are assumed to retain this coverage until their death. If currently on an ACWA Anthem plan, 80% are assumed to continue this coverage until death, while 20% are assumed to shift to outside coverage.

Spouse Coverage

Active employees: 30% of qualifying future retirees are assumed to be married participants who elect self-paid ACWA spouse coverage until their spouse reaches age 65. Husbands are assumed to be 3 years older than their wives.

Supporting Information
(Continued)

Section 3 - Actuarial Methods and Assumptions

Demographic Assumptions

Demographic actuarial assumptions used in this valuation are based on the 2017 experience study of the California Public Employees Retirement System using data from 1997 to 2015, except for a different basis used to project future mortality improvements. Rates for selected age and service are shown below and on the following pages. The representative mortality rates were those published by CalPERS adjusted to back out 15 years of Scale MP 2016 to central year 2015.

Mortality Improvement

MacLeod Watts Scale 2020 applied generationally from 2015 (see Addendum 3)

Mortality Before Retirement
(before improvement applied)

CalPERS Public Agency Miscellaneous Non-Industrial Deaths		
Age	Male	Female
15	0.00019	0.00004
20	0.00027	0.00008
30	0.00044	0.00018
40	0.00070	0.00040
50	0.00135	0.00090
60	0.00288	0.00182
70	0.00693	0.00438
80	0.01909	0.01080

Mortality After Retirement
(before improvement applied)

Healthy Lives

CalPERS Public Agency Miscellaneous, Police & Fire Post Retirement Mortality		
Age	Male	Female
40	0.00070	0.00040
50	0.00431	0.00390
60	0.00758	0.00524
70	0.01490	0.01044
80	0.04577	0.03459
90	0.14801	0.11315
100	0.35053	0.30412
110	1.00000	1.00000

Supporting Information
(Continued)

Section 3 - Actuarial Methods and Assumptions

Termination Rates

Miscellaneous Employees: Sum of Vested Terminated & Refund Rates From CalPERS Experience Study Report Issued December 2017						
Attained Age	Years of Service					
	0	3	5	10	15	20
15	0.1812	0.0000	0.0000	0.0000	0.0000	0.0000
20	0.1742	0.1193	0.0654	0.0000	0.0000	0.0000
25	0.1674	0.1125	0.0634	0.0433	0.0000	0.0000
30	0.1606	0.1055	0.0615	0.0416	0.0262	0.0000
35	0.1537	0.0987	0.0567	0.0399	0.0252	0.0184
40	0.1468	0.0919	0.0519	0.0375	0.0243	0.0176
45	0.1400	0.0849	0.0480	0.0351	0.0216	0.0168

Service Retirement Rates

The following miscellaneous retirement formulas apply:

Classic:	2% @ 55
PEPRA:	2% @ 62

Sample rates of assumed future retirements applicable to each of these retirement benefit formulas are shown in tables below.

Miscellaneous Employees: 2% at 55 formula From CalPERS Experience Study Report Issued December 2017						
Current Age	Years of Service					
	5	10	15	20	25	30
50	0.0080	0.0130	0.0180	0.0210	0.0220	0.0330
55	0.0400	0.0400	0.0560	0.0930	0.1090	0.1540
60	0.0580	0.0750	0.0930	0.1260	0.1430	0.1690
65	0.1450	0.1730	0.2010	0.2330	0.2660	0.2890
70	0.1500	0.1710	0.1920	0.2390	0.3040	0.3300
75 & over	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000

Miscellaneous "PEPRA" Employees: 2% at 62 formula From CalPERS Experience Study Report Issued December 2017						
Current Age	Years of Service					
	5	10	15	20	25	30
50	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
55	0.0100	0.0190	0.0280	0.0360	0.0610	0.0960
60	0.0310	0.0510	0.0710	0.0910	0.1110	0.1380
65	0.1080	0.1410	0.1730	0.2060	0.2390	0.3000
70	0.1200	0.1560	0.1930	0.2290	0.2650	0.3330
75 & over	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000

Supporting Information
(Continued)

Section 3 - Actuarial Methods and Assumptions

Changes in assumptions or methods as of the Measurement Date

Discount rate	Decreased from 6.15% to 5.3% for accounting and funding, based on recently published information provided by the trustee and investment manager
Demographic Assumptions	Assumed mortality, termination, and service retirement rates were updated from those provided in the prior actuarial report to those provided in the 2017 experience study report of CalPERS. Given the size of the District's plan population, we believe rates from the CalPERS experience study provide a reasonable estimate of the future demographic experience.
Mortality improvement	We are uncertain about the specific mortality improvement applied in the 2019 valuation. We applied the MacLeod Watts 2020 improvement scale (see Addendum 3 for details).
Medical trend	Prior trend was reported to be:

FYB	Medical/Rx
2019	6.0%
2020	5.5
2021	5.0
2022+	4.5

We updated medical trend to the Getzen model which was published by the Society of Actuaries; see also page 29.

General inflation rate	Increased from 2.25% to 2.5% per year
Spouse coverage	We increased the percentage of future retirees assumed to elect self-paid spouse coverage from 25% to 30% prior to Medicare eligibility, based on a review of current retiree elections and our estimate of future experience.
Age-based claim costs	We applied a different set of age-based claim factors to convert the ACWA-JPIA group premium rates to age-based premium rates and extended this to all ages.

The prior factors are shown here but were not applied after age 65.

Age	Medical/Rx
50	$6,932
55	7,843
60	8,873
64	9,794

Addendum 1: Important Background Information

General Types of Other Post-Employment Benefits (OPEB)

Post-employment benefits other than pensions (OPEB) comprise a part of compensation that employers offer for services received. The most common OPEB are medical, prescription drug, dental, vision, and/or life insurance coverage. Other OPEB may include outside group legal, long-term care, or disability benefits outside of a pension plan. OPEB does not generally include COBRA, vacation, sick leave (unless converted to defined benefit OPEB), or other direct retiree payments.

A direct employer payment toward the cost of OPEB benefits is referred to as an "explicit subsidy". In addition, if claims experience of employees and retirees are pooled when determining premiums, retiree premiums are based on a pool of members which, on average, are younger and healthier. For certain types of coverage such as medical insurance, this results in an "implicit subsidy" of retiree premiums by active employee premiums since the retiree premiums are lower than they would have been if retirees were insured separately. GASB 75 and Actuarial Standards of Practice generally require that an implicit subsidy of retiree premium rates be valued as an OPEB liability.

<table>
<tr><td colspan="3">Expected retiree claims</td></tr>
<tr><td colspan="2">Premium charged for retiree coverage</td><td>Covered by higher active premiums</td></tr>
<tr><td>Retiree portion of premium</td><td>Agency portion of premium
Explicit subsidy</td><td>Implicit subsidy</td></tr>
</table>

This chart shows the sources of funds needed to cover expected medical claims for pre-Medicare retirees. The portion of the premium paid by the Agency does not impact the amount of the implicit subsidy.

Valuation Process

The valuation was based on employee census data and benefits provided by the District. A summary of the employee data is provided in Section 1 and a summary of the benefits provided under the Plan is provided in Section 2. While individual employee records have been reviewed to verify that they are reasonable in various respects, the data has not been audited and we have otherwise relied on the District as to its accuracy. The valuation was also based on the actuarial methods and assumptions described in Section 3.

In developing the projected benefit values and liabilities, we first determine an expected premium or benefit stream over the employee's future retirement. Benefits may include both direct employer payments (explicit subsidies) and/or an implicit subsidy, arising when retiree premiums are expected to be subsidized by active employee premiums. The projected benefit streams reflect assumed trends in the cost of those benefits and assumptions as to the expected date(s) when benefits will end. We then apply assumptions regarding:

- The probability that each individual employee will or will not continue in service to receive benefits.
- The probability of when such retirement will occur for each retiree, based on current age, service and employee type; and
- The likelihood that future retirees will or will not elect retiree coverage (and benefits) for themselves and/or their dependents.

Important Background Information
(Continued)

We then calculate a present value of these benefits by discounting the value of each future expected benefit payment, multiplied by the assumed expectation that it will be paid, back to the valuation date using the discount rate. These benefit projections and liabilities have a very long time horizon. The final payments for currently active employees may not be made for many decades.

The resulting present value for each employee is allocated as a level percent of payroll each year over the employee's career using the entry age normal cost method and the amounts for each individual are then summed to get the results for the entire plan. This creates a cost expected to increase each year as payroll increases. Amounts attributed to prior fiscal years form the "Total OPEB Liability". The OPEB cost allocated for active employees in the current year is referred to as "Service Cost".

Where contributions have been made to an irrevocable OPEB trust, the accumulated value of trust assets ("Fiduciary Net Position") is applied to offset the "Total OPEB Liability", resulting in the "Net OPEB Liability". If a plan is not being funded, then the Net OPEB Liability is equal to the Total OPEB Liability.

It is important to remember that an actuarial valuation is, by its nature, a projection of one possible future outcome based on many assumptions. To the extent that actual experience is not what we assumed, future results will differ. Some possible sources of future differences may include:

- A significant change in the number of covered or eligible plan members
- A significant increase or decrease in the future premium rates
- A change in the subsidy provided by the Agency toward retiree premiums
- Longer life expectancies of retirees
- Significant changes in expected retiree healthcare claims by age, relative to healthcare claims for active employees and their dependents
- Higher or lower returns on plan assets or contribution levels other than were assumed, and/or
- Changes in the discount rate used to value the OPEB liability

Important Background Information
(Continued)

Requirements of GASB 75

The Governmental Accounting Standards Board (GASB) issued GASB Statement No. 75, *Accounting and Financial Reporting by Employers for Postemployment Benefits Other Than Pensions*. This Statement establishes standards for the measurement, recognition, and disclosure of OPEB expense and related liabilities (assets), note disclosures, and, required supplementary information (RSI) in the financial reports of state and local governmental employers.

Important Dates

GASB 75 requires that the information used for financial reporting falls within prescribed timeframes. Actuarial valuations of the total OPEB liability are generally required at least every two years. If a valuation is not performed as of the Measurement Date, then liabilities are required to be based on roll forward procedures from a prior valuation performed no more than 30 months and 1 day prior to the most recent year-end. In addition, the net OPEB liability is required to be measured as of a date no earlier than the end of the prior fiscal year (the "Measurement Date").

Recognition of Plan Changes and Gains and Losses

Under GASB 75, gains and losses related to changes in Total OPEB Liability and Fiduciary Net Position are recognized in OPEB expense systematically over time.

- *Timing of recognition*: Changes in the Total OPEB Liability relating to changes in plan benefits are recognized immediately (fully expensed) in the year in which the change occurs. Gains and Losses are amortized, with the applicable period based on the type of gain or loss. The first amortized amounts are recognized in OPEB expense for the year the gain or loss occurs. The remaining amounts are categorized as deferred outflows and deferred inflows of resources related to OPEB and are to be recognized in future OPEB expense.

- *Deferred recognition periods:* These periods differ depending on the source of the gain or loss.

Difference between projected and actual trust earnings:	5 year straight-line recognition
All other amounts:	Straight-line recognition over the expected average remaining service lifetime (EARSL) of all members that are provided with benefits, determined as of the beginning of the Measurement Period. In determining the EARSL, all active, retired and inactive (vested) members are counted, with the latter two groups having 0 remaining service years.

Important Background Information
(Continued)

Implicit Subsidy Plan Contributions

An implicit subsidy occurs when expected retiree claims exceed the premiums charged for retiree coverage. When this occurs, we expect part of the premiums paid for active employees to cover a portion of retiree claims. This transfer represents the current year's "implicit subsidy". Because GASB 75 treats payments to an irrevocable trust *or directly to the insurer* as employer contributions, each year's implicit subsidy is treated as a contribution toward the payment of retiree benefits.

The following hypothetical example illustrates this treatment:

Hypothetical Illustration of Implicit Subsidy Recognition	For Active Employees	For Retired Employees
Prior to Implicit Subsidy Adjustment		
Premiums Paid by Agency During Fiscal Year	$ 411,000	$ 48,000
Accounting Treatment	Compensation Cost for Active Employees	Contribution to Plan & Benefits Paid from Plan
After Implicit Subsidy Adjustment		
Premiums Paid by Agency During Fiscal Year	$ 411,000	$ 48,000
Implicit Subsidy Adjustment	(23,000)	23,000
Accounting Cost of Premiums Paid	$ 388,000	$ 71,000
Accounting Treatment Impact	Reduces Compensation Cost for Active Employees	Increases Contributions to Plan & Benefits Paid from Plan

The example above shows that total payments toward active and retired employee healthcare premiums is the same, but for accounting purposes part of the total is shifted from actives to retirees. This shifted amount is recognized as an OPEB contribution and reduces the current year's premium expense for active employees.

Important Background Information
(Continued)

Discount Rate

When the financing of OPEB liabilities is on a pay-as-you-go basis, GASB 75 requires that the discount rate used for valuing liabilities be based on the yield or index rate for 20-year, tax-exempt general obligation municipal bonds with an average rating of AA/Aa or higher (or equivalent quality on another rating scale). When a plan sponsor makes regular, sufficient contributions to a trust in order to prefund the OPEB liabilities, GASB 75 allows use of a rate up to the expected rate of return of the trust. Therefore, prefunding has an advantage of potentially being able to report overall lower liabilities due to future expected benefits being discounted at a higher rate.

Actuarial Funding Method and Assumptions

The "ultimate real cost" of an employee benefit plan is the value of all benefits and other expenses of the plan over its lifetime. These expenditures are dependent only on the terms of the plan and the administrative arrangements adopted, and as such are not affected by the actuarial funding method.

The actuarial funding method attempts to spread recognition of these expected costs on a level basis over the life of the plan, and as such sets the "incidence of cost". GASB 75 specifically requires that the actuarial present value of projected benefit payments be attributed to periods of employee service using the Entry Age Actuarial Cost Method, with each period's service cost determined as a level percentage of pay.

The results of this report may not be appropriate for other purposes, where other assumptions, methodology and/or actuarial standards of practice may be required or more suitable.

Addendum 2: MacLeod Watts Age Rating Methodology

Both accounting standards (e.g. GASB 75) and actuarial standards (e.g. ASOP 6) require that expected retiree claims, not just premiums paid, be reflected in most situations where an actuary is calculating retiree healthcare liabilities. Unfortunately, the actuary is often required to perform these calculations without any underlying claims information. In most situations, the information is not available, but even when available, the information may not be credible due to the size of the group being considered.

Actuaries have developed methodologies to approximate healthcare claims from the premiums being paid by the plan sponsor. Any methodology requires adopting certain assumptions and using general studies of healthcare costs as substitutes when there is a lack of credible claims information for the specific plan being reviewed.

Premiums paid by sponsors are often uniform for all employee and retiree ages and genders, with a drop in premiums for those participants who are Medicare-eligible. While the total premiums are expected to pay for the total claims for the insured group, on average, the premiums charged would not be sufficient to pay for the claims of older insureds and would be expected to exceed the expected claims of younger insureds. An age-rating methodology takes the typically uniform premiums paid by plan sponsors and spreads the total premium dollars to each age and gender intended to better approximate what the insurer might be expecting in actual claims costs at each age and gender.

The process of translating premiums into expected claims by age and gender generally follows the steps below.

1. *Obtain or Develop Relative Medical Claims Costs by Age, Gender, or other categories that are deemed significant*. For example, a claims cost curve might show that, if a 50 year old male has $1 in claims, then on average a 50 year old female has claims of $1.25, a 30 year male has claims of $0.40, and an 8 year old female has claims of $0.20. The claims cost curve provides such relative costs for each age, gender, or any other significant factor the curve might have been developed to reflect. Section 3 provides the source of information used to develop such a curve and shows sample relative claims costs developed for the plan under consideration.
2. *Obtain a census of participants, their chosen medical coverage, and the premium charged for their coverage.* An attempt is made to find the group of participants that the insurer considered in setting the premiums they charge for coverage. That group includes the participant and any covered spouses and children. When information about dependents is unavailable, assumptions must be made about spouse age and the number and age of children represented in the population. These assumptions are provided in Section 3.
3. *Spread the total premium paid by the group to each covered participant or dependent based on expected claims.* The medical claims cost curve is used to spread the total premium dollars paid by the group to each participant reflecting their age, gender, or other relevant category. After this step, the actuary has a schedule of expected claims costs for each age and gender for the current premium year. It is these claims costs that are projected into the future by medical cost inflation assumptions when valuing expected future retiree claims.

The methodology described above is dependent on the data and methodologies used in whatever study might be used to develop claims cost curves for any given plan sponsor. These methodologies and assumptions can be found in the referenced paper cited as a source in the valuation report.

Addendum 3: MacLeod Watts Mortality Projection Methodology

Actuarial standards of practice (e.g., ASOP 35, Selection of Demographic and Other Noneconomic Assumptions for Measuring Pension Obligations, and ASOP 6, Measuring Retiree Group Benefits Obligations) indicate that the actuary should reflect the effect of mortality improvement (i.e., longer life expectancies in the future), both before and after the measurement date. The development of credible mortality improvement rates requires the analysis of large quantities of data over long periods of time. Because it would be extremely difficult for an individual actuary or firm to acquire and process such extensive amounts of data, actuaries typically rely on large studies published periodically by organizations such as the Society of Actuaries or Social Security Administration.

As noted in a recent actuarial study on mortality improvement, key principles in developing a credible mortality improvement model would include the following:

(1) Short-term mortality improvement rates should be based on recent experience.
(2) Long-term mortality improvement rates should be based on expert opinion.
(3) Short-term mortality improvement rates should blend smoothly into the assumed long-term rates over an appropriate transition period.

The **MacLeod Watts Scale 2020** was developed from a blending of data and methodologies found in two published sources: (1) the Society of Actuaries Mortality Improvement Scale MP-2019 Report, published in October 2019 and (2) the demographic assumptions used in the 2019 Annual Report of the Board of Trustees of the Federal Old-Age and Survivors Insurance and Federal Disability Insurance Trust Funds, published April 2019.

MacLeod Watts Scale 2020 is a two-dimensional mortality improvement scale reflecting both age and year of mortality improvement. The underlying base scale is Scale MP-2019 which has two segments – (1) historical improvement rates for the period 1951-2015 and (2) an estimate of future mortality improvement for years 2016-2018 using the Scale MP-2019 methodology but utilizing the assumptions obtained from Scale MP-2015. The MacLeod Watts scale then transitions from the 2018 improvement rate to the Social Security Administration (SSA) Intermediate Scale linearly over the 10-year period 2019-2028. After this transition period, the MacLeod Watts Scale uses the constant mortality improvement rate from the SSA Intermediate Scale from 2028-2042. The SSA's Intermediate Scale has a final step down in 2043 which is reflected in the MacLeod Watts scale for years 2043 and thereafter. Over the ages 95 to 115, the SSA improvement rate is graded to zero.

Scale MP-2019 can be found at the SOA website and the projection scales used in the 2019 Social Security Administrations Trustees Report at the Social Security Administration website.

Glossary

Actuarial Funding Method – A procedure which calculates the actuarial present value of plan benefits and expenses, and allocates these expenses to time periods, typically as a normal cost and an actuarial accrued liability

Actuarial Present Value of Projected Benefits (APVPB) – The amount presently required to fund all projected plan benefits in the future. This value is determined by discounting the future payments by an appropriate interest rate and the probability of nonpayment.

CalPERS – Many state governments maintain a public employee retirement system; CalPERS is the California program, covering all eligible state government employees as well as other employees of other governments within California who have elected to join the system

Defined Benefit (DB) – A pension or OPEB plan which defines the monthly income or other benefit which the plan member receives at or after separation from employment

Deferred Contributions – When an employer makes contributions after the measurement date and prior to the fiscal year end, recognition of these contributions is deferred to a subsequent accounting period by creating a deferred resource. We refer to these contributions as Deferred Contributions.

Defined Contribution (DC) – A pension or OPEB plan which establishes an individual account for each member and specifies how contributions to each active member's account are determined and the terms of distribution of the account after separation from employment

Discount Rate - Interest rate used to discount future potential benefit payments to the valuation date. Under GASB 75, if a plan is prefunded, then the discount rate is equal to the expected trust return. If a plan is not prefunded (pay-as-you-go), then the rate of return is based on a yield or index rate for 20-year, tax-exempt general obligation municipal bonds with an average rating of AA/Aa or higher.

Expected Average Remaining Service Lifetime (EARSL) – Average of the expected remaining service lives of all employees that are provided with benefits through the OPEB plan (active employees and inactive employees), beginning in the current period

Entry Age Actuarial Cost Method – An actuarial funding method where, for each individual, the actuarial present value of benefits is levelly spread over the individual's projected earnings or service from entry age to the last age at which benefits can be paid

Explicit Subsidy – The projected dollar value of future retiree healthcare costs expected to be paid directly by the Employer, e.g., the Employer's payment of all or a portion of the monthly retiree premium billed by the insurer for the retiree's coverage

Fiduciary Net Position –The value of trust assets used to offset the Total OPEB Liability to determine the Net OPEB Liability.

Government Accounting Standards Board (GASB) – A private, not-for-profit organization which develops generally accepted accounting principles (GAAP) for U.S. state and local governments; like FASB, it is part of the Financial Accounting Foundation (FAF), which funds each organization and selects the members of each board

Glossary
(Continued)

Health Care Trend – The assumed rate(s) of increase in future dollar values of premiums or healthcare claims, attributable to increases in the cost of healthcare; contributing factors include medical inflation, frequency or extent of utilization of services and technological developments.

Implicit Subsidy – The projected difference between future retiree claims and the premiums to be charged for retiree coverage; this difference results when the claims experience of active and retired employees are pooled together and a 'blended' group premium rate is charged for both actives and retirees; a portion of the active employee premiums subsidizes the retiree premiums.

Net OPEB Liability (NOL) – The liability to employees for benefits provided through a defined benefit OPEB. Only assets administered through a trust that meet certain criteria may be used to reduce the Total OPEB Liability.

Net Position – The Impact on Statement of Net Position is the Net OPEB Liability adjusted for deferred resource items

OPEB Expense – The OPEB expense reported in the Agency's financial statement. OPEB expense is the annual cost of the plan recognized in the financial statements.

Other Post-Employment Benefits (OPEB) – Post-employment benefits other than pension benefits, most commonly healthcare benefits but also including life insurance if provided separately from a pension plan

Pay-As-You-Go (PAYGO) – Contributions to the plan are made at about the same time and in about the same amount as benefit payments and expenses coming due

PEMHCA – The Public Employees' Medical and Hospital Care Act, established by the California legislature in 1961, provides community-rated medical benefits to participating public employers. Among its extensive regulations are the requirements that a contracting Agency contribute toward medical insurance premiums for retired annuitants and that a contracting Agency file a resolution, adopted by its governing body, with the CalPERS Board establishing any new contribution.

Plan Assets – The value of cash and investments considered as 'belonging' to the plan and permitted to be used to offset the AAL for valuation purposes. To be considered a plan asset, GASB 75 requires (a) contributions to the OPEB plan be irrevocable, (b) OPEB assets to dedicated to providing OPEB benefit to plan members in accordance with the benefit terms of the plan, and (c) plan assets be legally protected from creditors, the OPEB plan administrator and the plan members.

Public Agency Miscellaneous (PAM) – Non-safety public employees.

Select and Ultimate – Actuarial assumptions which contemplate rates which differ by year initially (the select period) and then stabilize at a constant long-term rate (the ultimate rate)

Service Cost – Total dollar value of benefits expected to be earned by plan members in the current year, as assigned by the actuarial funding method; also called normal cost

Total OPEB Liability (TOL) – Total dollars required to fund all plan benefits attributable to service rendered as of the valuation date for current plan members and vested prior plan members; a subset of "Actuarial Present Value"

Vesting – As defined by the plan, requirements which when met make a plan benefit nonforfeitable on separation of service before retirement eligibility

HIGHMARK® CAPITAL MANAGEMENT

PARS DIVERSIFIED PORTFOLIOS
CONSERVATIVE

Q2 2021

WHY THE PARS DIVERSIFIED CONSERVATIVE PORTFOLIO?

Comprehensive Investment Solution

HighMark® Capital Management, Inc.'s (HighMark) diversified investment portfolios are designed to balance return expectations with risk tolerance. Key features include: sophisticated asset allocation and optimization techniques, four layers of diversification (asset class, style, manager, and security), access to rigorously screened, top tier money managers, flexible investment options, and experienced investment management.

Rigorous Manager Due Diligence

Our manager review committee utilizes a rigorous screening process that searches for investment managers and styles that have not only produced above-average returns within acceptable risk parameters, but have the resources and commitment to continue to deliver these results. We have set high standards for our investment managers and funds. This is a highly specialized, time consuming approach dedicated to one goal: competitive and consistent performance.

Flexible Investment Options

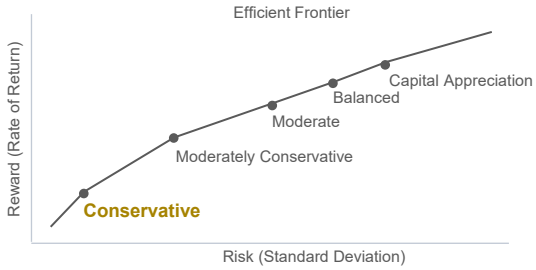
In order to meet the unique needs of our clients, we offer access to flexible implementation strategies: HighMark Plus utilizes actively managed mutual funds while Index Plus utilizes index-based securities, including exchange-traded funds. Both investment options leverage HighMark's active asset allocation approach.

Risk Management

The portfolio is constructed to control risk through four layers of diversification – asset classes (cash, fixed income, equity), investment styles (large cap, small cap, international, value, growth), managers and securities. Disciplined mutual fund selection and monitoring process helps to drive return potential while reducing portfolio risk.

INVESTMENT OBJECTIVE

To provide a consistent level of inflation-protected income over the long-term. The major portion of the assets will be fixed income related. Equity securities are utilized to provide inflation protection.



ASSET ALLOCATION — CONSERVATIVE PORTFOLIO

	Strategic Range	Policy	Tactical
Equity	5 – 20%	15%	16%
Fixed Income	60 – 95%	80%	83%
Cash	0 – 20%	5%	1%

ANNUALIZED TOTAL RETURNS

(Gross of Investment Management Fees, but Net of Embedded Fund Fees)

HighMark Plus Composite (Active)	
Current Quarter*	2.84%
Blended Benchmark,***	*2.09%*
Year To Date*	1.64%
Blended Benchmark,***	*1.33%*
1 Year	8.00%
*Blended Benchmark***	*6.08%*
3 Year	6.99%
*Blended Benchmark***	*6.30%*
5 Year	5.32%
*Blended Benchmark***	*4.71%*
10 Year	4.63%
*Blended Benchmark***	*4.20%*

Index Plus Composite (Passive)	
Current Quarter*	2.40%
Blended Benchmark,***	*2.09%*
Year To Date*	1.18%
Blended Benchmark,***	*1.33%*
1 Year	5.88%
*Blended Benchmark***	*6.08%*
3 Year	6.55%
*Blended Benchmark***	*6.30%*
5 Year	4.71%
*Blended Benchmark***	*4.71%*
10 Year	4.29%
*Blended Benchmark***	*4.20%*

* Returns less than one year are not annualized. **Breakdown for Blended Benchmark: From 10/1/2012 - Present: 7.5% S&P500, 1.5% Russell Mid Cap, 2.5% Russell 2000, 1% MSCI EM (net), 2% MSCI EAFE (net), 52.25% BBG Barclays US Agg, 25.75% ICE BofA 1-3 Yr US Corp/Gov't, 2% ICE BofA US High Yield Master II, 0.5% Wilshire REIT, and 5% FTSE 1 Mth US T-Bill. From 4/1/2007 – 9/30/2012, the blended benchmark was 12% S&P 500; 1% Russell 2000, 2% MSCI EAFE (net), 40% ICE BofA 1-3 Year Corp./Govt, 40% BBG Barclays US Agg, 5% FTSE 1 Mth US T-Bill. Prior to April 2007: the blended benchmark was 15% S&P 500, 40% ICE BofA 1-3Yr Corp/Gov, 40% BBG Barclays US Agg, and 5% FTSE 1 Mth US T-Bill.

ANNUAL RETURNS

(Gross of Investment Management Fees, but Net of Embedded Fund Fees)

HighMark Plus Composite (Active)	
2008	-9.04%
2009	15.59%
2010	8.68%
2011	2.19%
2012	8.45%
2013	3.69%
2014	3.88%
2015	0.29%
2016	4.18%
2017	6.73%
2018	-1.35%
2019	11.05%
2020	9.03%

Index Plus Composite (Passive)	
2008	-6.70%
2009	10.49%
2010	7.67%
2011	3.70%
2012	6.22%
2013	3.40%
2014	4.32%
2015	0.06%
2016	3.75%
2017	5.52%
2018	-1.09%
2019	10.37%
2020	8.56%

PORTFOLIO FACTS

HighMark Plus (Active)	
Composite Inception Date	07/2004
No of Holdings in Portfolio	20

Index Plus (Passive)	
Composite Inception Date	07/2004
No of Holdings in Portfolio	13

HOLDINGS

HighMark Plus (Active)

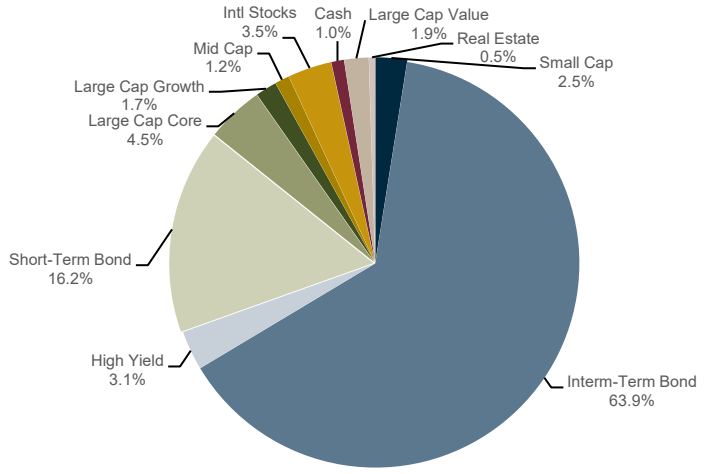
Columbia Contrarian Core I3
Vanguard Growth & Income Adm
Dodge & Cox Stock Fund
iShares S&P 500 Value ETF
Harbor Capital Appreciation - Retirement
T. Rowe Price Growth Stock - I
iShares Russell Mid-Cap ETF
Vanguard Real Estate ETF
Undiscovered Managers Behavioral Value-R6
Victory RS Small Cap Growth - R6
DFA Large Cap International Portfolio
Dodge & Cox International Stock
MFS International Growth - R6
Hartford Schroders Emerging Markets Eq
Vanguard Short-Term Invest-Grade Adm
PIMCO High Yield Instl
PIMCO Total Return Fund - Inst
PGIM Total Return Bond - R6
DoubleLine Core Fixed Income - I
First American Government Obligations Z

Index Plus (Passive)

iShares Core S&P 500 ETF
iShares S&P 500 Value ETF
iShares S&P 500 Growth ETF
iShares Russell Mid-Cap ETF
Vanguard Real Estate ETF
iShares Russell 2000 Value ETF
iShares Russell 2000 Growth ETF
iShares Core MSCI EAFE ETF
Vanguard FTSE Emerging Markets ETF
Vanguard Short-Term Invest-Grade Adm
iShares Core U.S. Aggregate
Vanguard High-Yield Corp Adm
First American Government Obligations Z

Holdings are subject to change at the discretion of the investment manager.

STYLE



The performance records shown represent size-weighted composites of tax exempt accounts that meet the following criteria: Accounts are managed by HighMark with full investment authority according to the PARS Conservative active and passive objectives.

The adviser to the PARS portfolios is US Bank, and HighMark serves as sub-adviser to US Bank to manage these portfolios. US Bank may charge clients as much as 0.60% annual management fee based on a sliding scale. US Bank pays HighMark 60% of the annual management fee for assets sub-advised by HighMark under its sub-advisory agreement with US Bank. The 0.36% paid to HighMark, as well as other expenses that may be incurred in the management of the portfolio, will reduce the portfolio's returns. Assuming an investment for five years, a 5% annual total return, and an annual sub-advisory fee rate of 0.36% deducted from the assets at market at the end of each year, a $10 million initial value would grow to $12.53 million after fees (Net-of-Fees) and $12.76 million before fees (Gross-of-Fees). Gross returns are presented before management and custodial fees but after all trading expenses and reflect the reinvestment of dividends and other income. A client's return will be reduced by the advisory fees and other expenses it may incur as a client. Additional information regarding the firm's policies and procedures for calculating and reporting performance results is available upon request. Performance results are calculated and presented in U.S. dollars and do not reflect the deduction of investment advisory fees, custody fees, or taxes but do reflect the deduction of trading expenses. Returns are calculated based on trade-date accounting.

Blended benchmarks represent HighMark's strategic allocations between equity, fixed income, and cash and are rebalanced monthly. Benchmark returns do not reflect the deduction of advisory fees or other expenses of investing but assumes the reinvestment of dividends and other earnings. An investor cannot invest directly in an index. The unmanaged S&P 500 Index is representative of the performance of large companies in the U.S. stock market. The MSCI EAFE Index is a free float-adjusted market capitalization index designed to measure developed market equity performance, excluding the U.S. and Canada. The MSCI Emerging Markets Index is a free float-adjusted market capitalization index that is designed to measure equity market performance in the global emerging markets. The Russell Midcap Index measures the performance of the mid-cap segment of the U.S. equity universe. The Russell 2000 Index measures the performance of the small-cap segment of the U.S. equity universe. The ICE BofA US High Yield Master II Index tracks the performance of below investment grade U.S. dollar-denominated corporate bonds publicly issued in the U.S. domestic market. Wilshire REIT index measures U.S. publicly traded Real Estate Investment Trusts. The unmanaged Bloomberg Barclays U.S. Aggregate Bond Index is generally representative of the U.S. taxable bond market as a whole. The ICE BofA 1-3 Year U.S. Corporate & Government Index tracks the bond performance of the ICE BofA U.S. Corporate & Government Index, with a remaining term to final maturity less than 3 years. The unmanaged FTSE 1-Month U.S. Treasury Bill Index tracks the yield of the 1-month U.S. Treasury Bill.

HighMark Capital Management, Inc. (HighMark), an SEC-registered investment adviser, is a wholly owned subsidiary of MUFG Union Bank, N.A. (MUB). HighMark manages institutional separate account portfolios for a wide variety of for-profit and nonprofit organizations, public agencies, and public and private retirement plans. MUB, a subsidiary of MUFG Americas Holdings Corporation, provides certain services to HighMark and is compensated for these services. Past performance does not guarantee future results. Individual account management and construction will vary depending on each client's investment needs and objectives. **Investments employing HighMark strategies are NOT insured by the FDIC or by any other Federal Government Agency, are NOT Bank deposits, are NOT guaranteed by the Bank or any Bank affiliate, and MAY lose value, including possible loss of principal.**

HIGHMARK CAPITAL MANAGEMENT

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ABOUT THE ADVISER

HighMark® Capital Management, Inc. (HighMark) has 100 years (including predecessor organizations) of institutional money management experience with $9.3 billion in assets under management and $9.5 billion in assets under advisement*. HighMark has a long term disciplined approach to money management and currently manages assets for a wide array of clients.

ABOUT THE PORTFOLIO MANAGEMENT TEAM

Andrew Brown, CFA®
Senior Portfolio Manager
Investment Experience: since 1994
HighMark Tenure: since 1997
Education: MBA, University of Southern California; BA, University of Southern California

Salvatore "Tory" Milazzo III, CFA®
Senior Portfolio Manager
Investment Experience: since 2004
HighMark Tenure: since 2014
Education: BA, Colgate University

J. Keith Stribling, CFA®
Senior Portfolio Manager
Investment Experience: since 1985
HighMark Tenure: since 1995
Education: BA, Stetson University

Christiane Tsuda
Senior Portfolio Manager
Investment Experience: since 1987
HighMark Tenure: since 2010
Education: BA, International Christian University, Tokyo

Anne Wimmer, CFA®
Senior Portfolio Manager
Investment Experience: since 1987
HighMark Tenure: since 2007
Education: BA, University of California, Santa Barbara

Randy Yurchak, CFA®
Senior Portfolio Manager
Investment Experience: since 2002
HighMark Tenure: since 2017
Education: MBA, Arizona State University; BS, University of Washington

Asset Allocation Committee
Number of Members: 17
Average Years of Experience: 26
Average Tenure (Years): 14

Manager Review Group
Number of Members: 8
Average Years of Experience: 20
Average Tenure (Years): 9

*Assets under management ("AUM") include assets for which HighMark provides continuous and regular supervisory and management services. Assets under advisement ("AUA") include assets for which HighMark provides certain investment advisory services (including, but not limited to, investment research and strategies) for client assets of its parent company, MUFG Union Bank, N.A.

HIGHMARK® CAPITAL MANAGEMENT

PARS DIVERSIFIED PORTFOLIOS

MODERATELY CONSERVATIVE

Q2 2021

WHY THE PARS DIVERSIFIED MODERATELY CONSERVATIVE PORTFOLIO?

Comprehensive Investment Solution

HighMark® Capital Management, Inc.'s (HighMark) diversified investment portfolios are designed to balance return expectations with risk tolerance. Key features include: sophisticated asset allocation and optimization techniques, four layers of diversification (asset class, style, manager, and security), access to rigorously screened, top tier money managers, flexible investment options, and experienced investment management.

Rigorous Manager Due Diligence

Our manager review committee utilizes a rigorous screening process that searches for investment managers and styles that have not only produced above-average returns within acceptable risk parameters, but have the resources and commitment to continue to deliver these results. We have set high standards for our investment managers and funds. This is a highly specialized, time consuming approach dedicated to one goal: competitive and consistent performance.

Flexible Investment Options

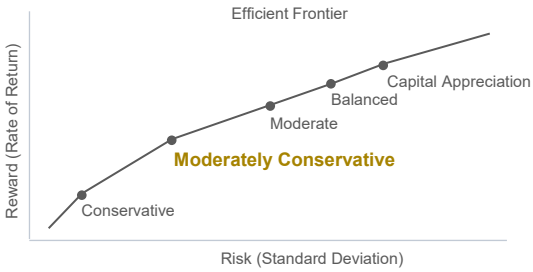
In order to meet the unique needs of our clients, we offer access to flexible implementation strategies: HighMark Plus utilizes actively managed mutual funds while Index Plus utilizes index-based securities, including exchange-traded funds. Both investment options leverage HighMark's active asset allocation approach.

Risk Management

The portfolio is constructed to control risk through four layers of diversification – asset classes (cash, fixed income, equity), investment styles (large cap, small cap, international, value, growth), managers and securities. Disciplined mutual fund selection and monitoring process helps to drive return potential while reducing portfolio risk.

INVESTMENT OBJECTIVE

To provide current income, with capital appreciation as a secondary objective. The major portion of the assets is committed to income-producing securities. Market fluctuations should be expected.



ASSET ALLOCATION — MODERATELY CONSERVATIVE PORTFOLIO

	Strategic Range	Policy	Tactical
Equity	20 - 40%	30%	32%
Fixed Income	50 - 80%	65%	67%
Cash	0 - 20%	5%	1%

ANNUALIZED TOTAL RETURNS

(Gross of Investment Management Fees, but Net of Embedded Fund Fees)

HighMark Plus Composite (Active)	
Current Quarter*	3.67%
Blended Benchmark,***	*3.12%*
Year To Date*	3.97%
Blended Benchmark,***	*3.47%*
1 Year	14.19%
*Blended Benchmark***	*11.97%*
3 Year	8.62%
*Blended Benchmark***	*8.24%*
5 Year	7.25%
*Blended Benchmark***	*6.78%*
10 Year	6.01%
*Blended Benchmark***	*5.89%*

Index Plus Composite (Passive)	
Current Quarter*	3.25%
Blended Benchmark,***	*3.12%*
Year To Date*	3.50%
Blended Benchmark,***	*3.47%*
1 Year	11.58%
*Blended Benchmark***	*11.97%*
3 Year	8.18%
*Blended Benchmark***	*8.24%*
5 Year	6.56%
*Blended Benchmark***	*6.78%*
10 Year	5.73%
*Blended Benchmark***	*5.89%*

* Returns less than one year are not annualized. **Breakdown for Blended Benchmark: From 10/1/2012 - Present: 15.5% S&P500, 3% Russell Mid Cap, 4.5% Russell 2000, 2% MSCI EM (net), 4% MSCI EAFE (net), 49.25% BBG Barclays US Agg, 14% ICE BofA 1-3 Yr US Corp/Gov't, 1.75% ICE BofA US High Yield Master II, 1% Wilshire REIT, and 5% FTSE 1 Mth US T-Bill. From 4/1/2007 - 9/30/2012: the blended benchmark was 25% S&P 500; 1.5% Russell 2000, 3.5% MSCI EAFE (net), 25% ICE BofA 1-3 Year Corp./Govt, 40% BBG Barclays US Agg, 5% FTSE 1 Mth US T-Bill. Prior to April 2007, the blended benchmark was 30% S&P 500, 25% ICE BofA 1-3Yr Corp/Gov, 40% BBG Barclays US Agg, and 5% FTSE 1 Mth US T-Bill.

ANNUAL RETURNS

(Gross of Investment Management Fees, but Net of Embedded Fund Fees)

HighMark Plus Composite (Active)	
2008	-15.37%
2009	18.71%
2010	10.46%
2011	1.75%
2012	10.88%
2013	7.30%
2014	4.41%
2015	0.32%
2016	4.94%
2017	9.56%
2018	-2.60%
2019	13.73%
2020	10.76%

Index Plus Composite (Passive)	
2008	-12.40%
2009	11.92%
2010	9.72%
2011	3.24%
2012	8.24%
2013	6.78%
2014	5.40%
2015	-0.18%
2016	5.42%
2017	8.08%
2018	-2.33%
2019	13.53%
2020	9.74%

PORTFOLIO FACTS

HighMark Plus (Active)	
Composite Inception Date	08/2004
No of Holdings in Portfolio	20

Index Plus (Passive)	
Composite Inception Date	05/2005
No of Holdings in Portfolio	13

HOLDINGS

HighMark Plus (Active)

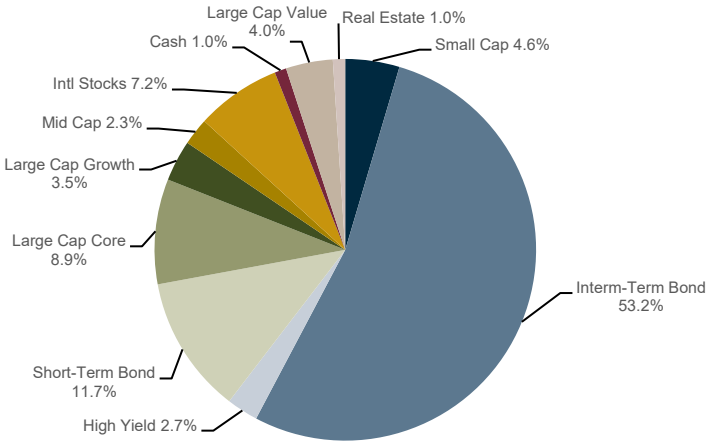
Columbia Contrarian Core I3
Vanguard Growth & Income Adm
Dodge & Cox Stock Fund
iShares S&P 500 Value ETF
Harbor Capital Appreciation - Retirement
T. Rowe Price Growth Stock - I
iShares Russell Mid-Cap ETF
Vanguard Real Estate ETF
Undiscovered Managers Behavioral Value-R6
Victory RS Small Cap Growth - R6
DFA Large Cap International Portfolio
Dodge & Cox International Stock
MFS International Growth - R6
Hartford Schroders Emerging Markets Eq
Vanguard Short-Term Invest-Grade Adm
PIMCO High Yield Instl
PIMCO Total Return Fund - Inst
PGIM Total Return Bond - R6
DoubleLine Core Fixed Income - I
First American Government Obligations Z

Index Plus (Passive)

iShares Core S&P 500 ETF
iShares S&P 500 Value ETF
iShares S&P 500 Growth ETF
iShares Russell Mid-Cap ETF
Vanguard Real Estate ETF
iShares Russell 2000 Value ETF
iShares Russell 2000 Growth ETF
iShares Core MSCI EAFE ETF
Vanguard FTSE Emerging Markets ETF
Vanguard Short-Term Invest-Grade Adm
iShares Core U.S. Aggregate
Vanguard High-Yield Corp Adm
First American Government Obligations Z

Holdings are subject to change at the discretion of the investment manager.

STYLE



The performance records shown represent a size-weighted composite of tax exempt accounts that meet the following criteria: Accounts are managed by HighMark with full investment authority according to the PARS Moderately Conservative active and passive objectives.

The adviser to the PARS portfolios is US Bank, and HighMark serves as sub-adviser to US Bank to manage these portfolios. US Bank may charge clients as much as 0.60% annual management fee based on a sliding scale. US Bank pays HighMark 60% of the annual management fee for assets sub-advised by HighMark under its sub-advisory agreement with US Bank. The 0.36% paid to HighMark, as well as other expenses that may be incurred in the management of the portfolio, will reduce the portfolio's returns. Assuming an investment for five years, a 5% annual total return, and an annual sub-advisory fee rate of 0.36% deducted from the assets at market at the end of each year, a $10 million initial value would grow to $12.53 million after fees (Net-of-Fees) and $12.76 million before fees (Gross-of-Fees). Gross returns are presented before management and custodial fees but after all trading expenses and reflect the reinvestment of dividends and other income. A client's return will be reduced by the advisory fees and other expenses it may incur as a client. Additional information regarding the firm's policies and procedures for calculating and reporting performance results is available upon request. Performance results are calculated and presented in U.S. dollars and do not reflect the deduction of investment advisory fees, custody fees, or taxes but do reflect the deduction of trading expenses. Returns are calculated based on trade-date accounting.

Blended benchmarks represent HighMark's strategic allocations between equity, fixed income, and cash and are rebalanced monthly. Benchmark returns do not reflect the deduction of advisory fees or other expenses of investing but assumes the reinvestment of dividends and other earnings. An investor cannot invest directly in an index. The unmanaged S&P 500 Index is representative of the performance of large companies in the U.S. stock market. The MSCI EAFE Index is a free float-adjusted market capitalization index designed to measure developed market equity performance, excluding the U.S. and Canada. The MSCI Emerging Markets Index is a free float-adjusted market capitalization index that is designed to measure equity market performance in the global emerging markets. The Russell Midcap Index measures the performance of the mid-cap segment of the U.S. equity universe. The Russell 2000 Index measures the performance of the small-cap segment of the U.S. equity universe. The ICE BofA US High Yield Master II Index tracks the performance of below investment grade U.S. dollar-denominated corporate bonds publicly issued in the U.S. domestic market. Wilshire REIT index measures U.S. publicly traded Real Estate Investment Trusts. The unmanaged Bloomberg Barclays U.S. Aggregate Bond Index is generally representative of the U.S. taxable bond market as a whole. The ICE BofA 1-3 Year U.S. Corporate & Government Index tracks the bond performance of the ICE BofA U.S. Corporate & Government Index, with a remaining term to final maturity less than 3 years. The unmanaged FTSE 1-Month U.S. Treasury Bill Index tracks the yield of the 1-month U.S. Treasury Bill.

HighMark Capital Management, Inc. (HighMark), an SEC-registered investment adviser, is a wholly owned subsidiary of MUFG Union Bank, N.A. (MUB). HighMark manages institutional separate account portfolios for a wide variety of for-profit and nonprofit organizations, public agencies, and public and private retirement plans. MUB, a subsidiary of MUFG Americas Holdings Corporation, provides certain services to HighMark and is compensated for these services. Past performance does not guarantee future results. Individual account management and construction will vary depending on each client's investment needs and objectives. **Investments employing HighMark strategies are NOT insured by the FDIC or by any other Federal Government Agency, are NOT Bank deposits, are NOT guaranteed by the Bank or any Bank affiliate, and MAY lose value, including possible loss of principal.**

HIGHMARK CAPITAL MANAGEMENT

350 California Street
Suite 1600
San Francisco, CA 94104
800-582-4734

ABOUT THE ADVISER

HighMark® Capital Management, Inc. (HighMark) has 100 years (including predecessor organizations) of institutional money management experience with $9.3 billion in assets under management and $9.5 billion in assets under advisement*. HighMark has a long term disciplined approach to money management and currently manages assets for a wide array of clients.

ABOUT THE PORTFOLIO MANAGEMENT TEAM

Andrew Brown, CFA®
Senior Portfolio Manager
Investment Experience: since 1994
HighMark Tenure: since 1997
Education: MBA, University of Southern California; BA, University of Southern California

Salvatore "Tory" Milazzo III, CFA®
Senior Portfolio Manager
Investment Experience: since 2004
HighMark Tenure: since 2014
Education: BA, Colgate University

J. Keith Stribling, CFA®
Senior Portfolio Manager
Investment Experience: since 1985
HighMark Tenure: since 1995
Education: BA, Stetson University

Christiane Tsuda
Senior Portfolio Manager
Investment Experience: since 1987
HighMark Tenure: since 2010
Education: BA, International Christian University, Tokyo

Anne Wimmer, CFA®
Senior Portfolio Manager
Investment Experience: since 1987
HighMark Tenure: since 2007
Education: BA, University of California, Santa Barbara

Randy Yurchak, CFA®
Senior Portfolio Manager
Investment Experience: since 2002
HighMark Tenure: since 2017
Education: MBA, Arizona State University; BS, University of Washington

Asset Allocation Committee
Number of Members: 17
Average Years of Experience: 26
Average Tenure (Years): 14

Manager Review Group
Number of Members: 8
Average Years of Experience: 20
Average Tenure (Years): 9

*Assets under management ("AUM") include assets for which HighMark provides continuous and regular supervisory and management services. Assets under advisement ("AUA") include assets for which HighMark provides certain investment advisory services (including, but not limited to, investment research and strategies) for client assets of its parent company, MUFG Union Bank, N.A.

HIGHMARK® CAPITAL MANAGEMENT

PARS DIVERSIFIED PORTFOLIOS
MODERATE

Q2 2021

WHY THE PARS DIVERSIFIED MODERATE PORTFOLIO?

Comprehensive Investment Solution

HighMark® Capital Management, Inc.'s (HighMark) diversified investment portfolios are designed to balance return expectations with risk tolerance. Key features include: sophisticated asset allocation and optimization techniques, four layers of diversification (asset class, style, manager, and security), access to rigorously screened, top tier money managers, flexible investment options, and experienced investment management.

Rigorous Manager Due Diligence

Our manager review committee utilizes a rigorous screening process that searches for investment managers and styles that have not only produced above-average returns within acceptable risk parameters, but have the resources and commitment to continue to deliver these results. We have set high standards for our investment managers and funds. This is a highly specialized, time consuming approach dedicated to one goal: competitive and consistent performance.

Flexible Investment Options

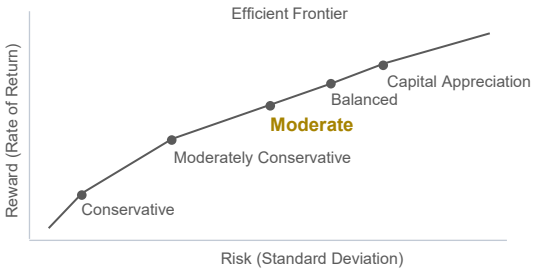
In order to meet the unique needs of our clients, we offer access to flexible implementation strategies: HighMark Plus utilizes actively managed mutual funds while Index Plus utilizes index-based securities, including exchange-traded funds. Both investment options leverage HighMark's active asset allocation approach.

Risk Management

The portfolio is constructed to control risk through four layers of diversification – asset classes (cash, fixed income, equity), investment styles (large cap, small cap, international, value, growth), managers and securities. Disciplined mutual fund selection and monitoring process helps to drive return potential while reducing portfolio risk.

INVESTMENT OBJECTIVE

To provide current income and moderate capital appreciation. It is expected that dividend and interest income will comprise a significant portion of total return, although growth through capital appreciation is equally important.



ASSET ALLOCATION — MODERATE PORTFOLIO

	Strategic Range	Policy	Tactical
Equity	40 - 60%	50%	53%
Fixed Income	40 - 60%	45%	46%
Cash	0 - 20%	5%	1%

ANNUALIZED TOTAL RETURNS

(Gross of Investment Management Fees, but Net of Embedded Fund Fees)

HighMark Plus Composite (Active)		Index Plus Composite (Passive)	
Current Quarter*	4.77%	Current Quarter*	4.39%
Blended Benchmark,***	*4.30%*	*Blended Benchmark*,***	*4.30%*
Year To Date*	7.12%	Year To Date*	6.76%
Blended Benchmark,***	*6.66%*	*Blended Benchmark*,***	*6.66%*
1 Year	22.58%	1 Year	19.88%
*Blended Benchmark***	*20.51%*	*Blended Benchmark***	*20.51%*
3 Year	10.87%	3 Year	10.20%
*Blended Benchmark***	*10.52%*	*Blended Benchmark***	*10.52%*
5 Year	9.90%	5 Year	9.04%
*Blended Benchmark***	*9.43%*	*Blended Benchmark***	*9.43%*
10 Year	7.81%	10 Year	7.55%
*Blended Benchmark***	*7.96%*	*Blended Benchmark***	*7.96%*

* Returns less than one year are not annualized. **Breakdown for Blended Benchmark: From 10/1/2012 – Present: 26.5% S&P500, 5% Russell Mid Cap, 7.5% Russell 2000, 3.25% MSCI EM (net), 6% MSCI EAFE (net), 33.50% BBG Barclays US Agg, 10% ICE BofA 1-3 Yr US Corp/Gov't, 1.50% ICE BofA US High Yield Master II, 1.75% Wilshire REIT, and 5% FTSE 1 Mth US T-Bill. From 4/1/2007 – 9/30/2012: the blended benchmark was 43% S&P 500; 2% Russell 2000, 5% MSCI EAFE (net), 15% ICE BofA 1-3 Year Corp./Govt, 30% BBG Barclays US Agg, 5% FTSE 1 Mth US T-Bill. Prior to April 2007: the blended benchmark was 50% S&P 500, 15% ICE BofA 1-3Yr Corp/Gov, 30% BBG Barclays US Agg, and 5% FTSE 1 Mth US T-Bill.

ANNUAL RETURNS

(Gross of Investment Management Fees, but Net of Embedded Fund Fees)

HighMark Plus Composite (Active)		Index Plus Composite (Passive)	
2008	-22.88%	2008	-18.14%
2009	21.47%	2009	16.05%
2010	12.42%	2010	11.77%
2011	0.55%	2011	2.29%
2012	12.25%	2012	10.91%
2013	13.06%	2013	12.79%
2014	4.84%	2014	5.72%
2015	0.14%	2015	-0.52%
2016	6.45%	2016	7.23%
2017	13.19%	2017	11.59%
2018	-4.03%	2018	-4.03%
2019	17.71%	2019	17.52%
2020	12.92%	2020	11.23%

PORTFOLIO FACTS

HighMark Plus (Active)		Index Plus (Passive)	
Composite Inception Date	10/2004	Composite Inception Date	05/2006
No of Holdings in Portfolio	20	No of Holdings in Portfolio	13

HOLDINGS

HighMark Plus (Active)

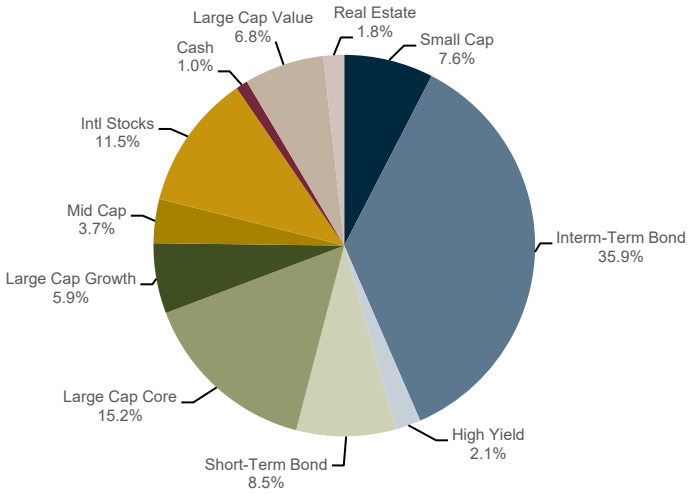
Columbia Contrarian Core I3
Vanguard Growth & Income Adm
Dodge & Cox Stock Fund
iShares S&P 500 Value ETF
Harbor Capital Appreciation - Retirement
T. Rowe Price Growth Stock - I
iShares Russell Mid-Cap ETF
Vanguard Real Estate ETF
Undiscovered Managers Behavioral Value-R6
Victory RS Small Cap Growth - R6
DFA Large Cap International Portfolio
Dodge & Cox International Stock
MFS International Growth - R6
Hartford Schroders Emerging Markets Eq
Vanguard Short-Term Invest-Grade Adm
PIMCO High Yield Instl
PIMCO Total Return Fund - Inst
PGIM Total Return Bond - R6
DoubleLine Core Fixed Income - I
First American Government Obligations Z

Index Plus (Passive)

iShares Core S&P 500 ETF
iShares S&P 500 Value ETF
iShares S&P 500 Growth ETF
iShares Russell Mid-Cap ETF
Vanguard Real Estate ETF
iShares Russell 2000 Value ETF
iShares Russell 2000 Growth ETF
iShares Core MSCI EAFE ETF
Vanguard FTSE Emerging Markets ETF
Vanguard Short-Term Invest-Grade Adm
iShares Core U.S. Aggregate
Vanguard High-Yield Corp Adm
First American Government Obligations Z

Holdings are subject to change at the discretion of the investment manager.

STYLE



The performance records shown represent size-weighted composites of tax exempt accounts that meet the following criteria: Accounts are managed by HighMark with full investment authority according to the PARS Moderate active and passive objectives.

The adviser to the PARS portfolios is US Bank, and HighMark serves as sub-adviser to US Bank to manage these portfolios. US Bank may charge clients as much as 0.60% annual management fee based on a sliding scale. US Bank pays HighMark 60% of the annual management fee for assets sub-advised by HighMark under its sub-advisory agreement with US Bank. The 0.36% paid to HighMark, as well as other expenses that may be incurred in the management of the portfolio, will reduce the portfolio's returns. Assuming an investment for five years, a 5% annual total return, and an annual sub-advisory fee rate of 0.36% deducted from the assets at market at the end of each year, a $10 million initial value would grow to $12.53 million after fees (Net-of-Fees) and $12.76 million before fees (Gross-of-Fees). Gross returns are presented before management and custodial fees but after all trading expenses and reflect the reinvestment of dividends and other income. A client's return will be reduced by the advisory fees and other expenses it may incur as a client. Additional information regarding the firm's policies and procedures for calculating and reporting performance results is available upon request. Performance results are calculated and presented in U.S. dollars and do not reflect the deduction of investment advisory fees, custody fees, or taxes but do reflect the deduction of trading expenses. Returns are calculated based on trade-date accounting.

Blended benchmarks represent HighMark's strategic allocations between equity, fixed income, and cash and are rebalanced monthly. Benchmark returns do not reflect the deduction of advisory fees or other expenses of investing but assumes the reinvestment of dividends and other earnings. An investor cannot invest directly in an index. The unmanaged S&P 500 Index is representative of the performance of large companies in the U.S. stock market. The MSCI EAFE Index is a free float-adjusted market capitalization index designed to measure developed market equity performance, excluding the U.S. and Canada. The MSCI Emerging Markets Index is a free float-adjusted market capitalization index that is designed to measure equity market performance in the global emerging markets. The Russell Midcap Index measures the performance of the mid-cap segment of the U.S. equity universe. The Russell 2000 Index measures the performance of the small-cap segment of the U.S. equity universe. The ICE BofA US High Yield Master II Index tracks the performance of below investment grade U.S. dollar-denominated corporate bonds publicly issued in the U.S. domestic market. Wilshire REIT index measures U.S. publicly traded Real Estate Investment Trusts. The unmanaged Bloomberg Barclays U.S. Aggregate Bond Index is generally representative of the U.S. taxable bond market as a whole. The ICE BofA 1-3 Year U.S. Corporate & Government Index tracks the bond performance of the ICE BofA U.S. Corporate & Government Index, with a remaining term to final maturity less than 3 years. The unmanaged FTSE 1-Month U.S. Treasury Bill Index tracks the yield of the 1-month U.S. Treasury Bill.

HighMark Capital Management, Inc. (HighMark), an SEC-registered investment adviser, is a wholly owned subsidiary of MUFG Union Bank, N.A. (MUB). HighMark manages institutional separate account portfolios for a wide variety of for-profit and nonprofit organizations, public agencies, and public and private retirement plans. MUB, a subsidiary of MUFG Americas Holdings Corporation, provides certain services to HighMark and is compensated for these services. Past performance does not guarantee future results. Individual account management and construction will vary depending on each client's investment needs and objectives. **Investments employing HighMark strategies are NOT insured by the FDIC or by any other Federal Government Agency, are NOT Bank deposits, are NOT guaranteed by the Bank or any Bank affiliate, and MAY lose value, including possible loss of principal.**

HIGHMARK CAPITAL MANAGEMENT

350 California Street
Suite 1600
San Francisco, CA 94104
800-582-4734

ABOUT THE ADVISER

HighMark® Capital Management, Inc. (HighMark) has 100 years (including predecessor organizations) of institutional money management experience with $9.3 billion in assets under management and $9.5 billion in assets under advisement*. HighMark has a long term disciplined approach to money management and currently manages assets for a wide array of clients.

ABOUT THE PORTFOLIO MANAGEMENT TEAM

Andrew Brown, CFA®
Senior Portfolio Manager
Investment Experience: since 1994
HighMark Tenure: since 1997
Education: MBA, University of Southern California; BA, University of Southern California

Salvatore "Tory" Milazzo III, CFA®
Senior Portfolio Manager
Investment Experience: since 2004
HighMark Tenure: since 2014
Education: BA, Colgate University

J. Keith Stribling, CFA®
Senior Portfolio Manager
Investment Experience: since 1985
HighMark Tenure: since 1995
Education: BA, Stetson University

Christiane Tsuda
Senior Portfolio Manager
Investment Experience: since 1987
HighMark Tenure: since 2010
Education: BA, International Christian University, Tokyo

Anne Wimmer, CFA®
Senior Portfolio Manager
Investment Experience: since 1987
HighMark Tenure: since 2007
Education: BA, University of California, Santa Barbara

Randy Yurchak, CFA®
Senior Portfolio Manager
Investment Experience: since 2002
HighMark Tenure: since 2017
Education: MBA, Arizona State University; BS, University of Washington

Asset Allocation Committee
Number of Members: 17
Average Years of Experience: 26
Average Tenure (Years): 14

Manager Review Group
Number of Members: 8
Average Years of Experience: 20
Average Tenure (Years): 9

*Assets under management ("AUM") include assets for which HighMark provides continuous and regular supervisory and management services. Assets under advisement ("AUA") include assets for which HighMark provides certain investment advisory services (including, but not limited to, investment research and strategies) for client assets of its parent company, MUFG Union Bank, N.A.

HIGHMARK® CAPITAL MANAGEMENT

PARS DIVERSIFIED PORTFOLIOS
BALANCED

Q2 2021

WHY THE PARS DIVERSIFIED BALANCED PORTFOLIO?

Comprehensive Investment Solution

HighMark® Capital Management, Inc.'s (HighMark) diversified investment portfolios are designed to balance return expectations with risk tolerance. Key features include: sophisticated asset allocation and optimization techniques, four layers of diversification (asset class, style, manager, and security), access to rigorously screened, top tier money managers, flexible investment options, and experienced investment management.

Rigorous Manager Due Diligence

Our manager review committee utilizes a rigorous screening process that searches for investment managers and styles that have not only produced above-average returns within acceptable risk parameters, but have the resources and commitment to continue to deliver these results. We have set high standards for our investment managers and funds. This is a highly specialized, time consuming approach dedicated to one goal: competitive and consistent performance.

Flexible Investment Options

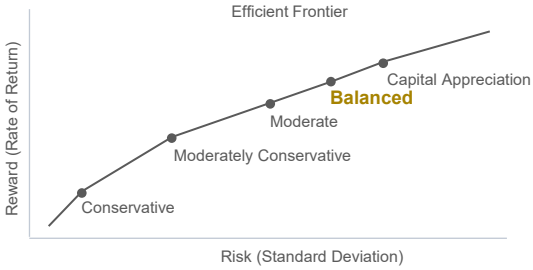
In order to meet the unique needs of our clients, we offer access to flexible implementation strategies: HighMark Plus utilizes actively managed mutual funds while Index Plus utilizes index-based securities, including exchange-traded funds. Both investment options leverage HighMark's active asset allocation approach.

Risk Management

The portfolio is constructed to control risk through four layers of diversification – asset classes (cash, fixed income, equity), investment styles (large cap, small cap, international, value, growth), managers and securities. Disciplined mutual fund selection and monitoring process helps to drive return potential while reducing portfolio risk.

INVESTMENT OBJECTIVE

To provide growth of principal and income. While dividend and interest income are an important component of the objective's total return, it is expected that capital appreciation will comprise a larger portion of the total return.



ASSET ALLOCATION — BALANCED PORTFOLIO

	Strategic Range	Policy	Tactical
Equity	50 – 70%	60%	63%
Fixed Income	30 – 50%	35%	36%
Cash	0 – 20%	5%	1%

ANNUALIZED TOTAL RETURNS

(Gross of Investment Management Fees, but Net of Embedded Fund Fees)

HighMark Plus Composite (Active)	
Current Quarter*	5.33%
Blended Benchmark,***	*4.94%*
Year To Date*	8.76%
Blended Benchmark,***	*8.27%*
1 Year	27.05%
*Blended Benchmark***	*24.96%*
3 Year	11.93%
*Blended Benchmark***	*11.66%*
5 Year	11.26%
*Blended Benchmark***	*10.76%*
10 Year	8.67%
*Blended Benchmark***	*9.02%*

Index Plus Composite (Passive)	
Current Quarter*	4.96%
Blended Benchmark,***	*4.94%*
Year To Date*	8.39%
Blended Benchmark,***	*8.27%*
1 Year	24.26%
*Blended Benchmark***	*24.96%*
3 Year	11.22%
*Blended Benchmark***	*11.66%*
5 Year	10.27%
*Blended Benchmark***	*10.76%*
10 Year	8.40%
*Blended Benchmark***	*9.02%*

* Returns less than one year are not annualized. **Breakdown for Blended Benchmark: From 10/1/2012 – Present: 32% S&P500, 6% Russell Mid Cap, 9% Russell 2000, 4% MSCI EM (net), 7% MSCI EAFE (net), 27% BBG Barclays US Agg, 6.75% ICE BofA 1-3 Yr US Corp/Gov't, 1.25% ICE BofA US High Yield Master II, 2% Wilshire REIT, and 5% FTSE 1 Mth US T-Bill. From 4/1/2007 – 9/30/2012: the blended benchmark was 51% S&P 500; 3% Russell 2000, 6% MSCI EAFE (net), 5% ICE BofA 1-3 Year Corp./Govt, 30% BBG Barclays US Agg, 5% FTSE 1 Mth US T-Bill. Prior to April 2007: the blended benchmark was 60% S&P 500, 5% ICE BofA 1-3Yr Corp/Gov, 30% BBG Barclays US Agg, and 5% FTSE 1 Mth US T-Bill.

ANNUAL RETURNS

(Gross of Investment Management Fees, but Net of Embedded Fund Fees)

HighMark Plus Composite (Active)	
2008	-25.72%
2009	21.36%
2010	14.11%
2011	-0.46%
2012	13.25%
2013	16.61%
2014	4.70%
2015	0.04%
2016	6.81%
2017	15.46%
2018	-4.88%
2019	19.85%
2020	14.06%

Index Plus Composite (Passive)	
2008	-23.22%
2009	17.62%
2010	12.76%
2011	1.60%
2012	11.93%
2013	15.63%
2014	6.08%
2015	-0.81%
2016	8.25%
2017	13.39%
2018	-5.05%
2019	19.59%
2020	12.07%

PORTFOLIO FACTS

HighMark Plus (Active)	
Composite Inception Date	10/2006
No of Holdings in Portfolio	20

Index Plus (Passive)	
Composite Inception Date	10/2007
No of Holdings in Portfolio	13

HOLDINGS

HighMark Plus (Active)

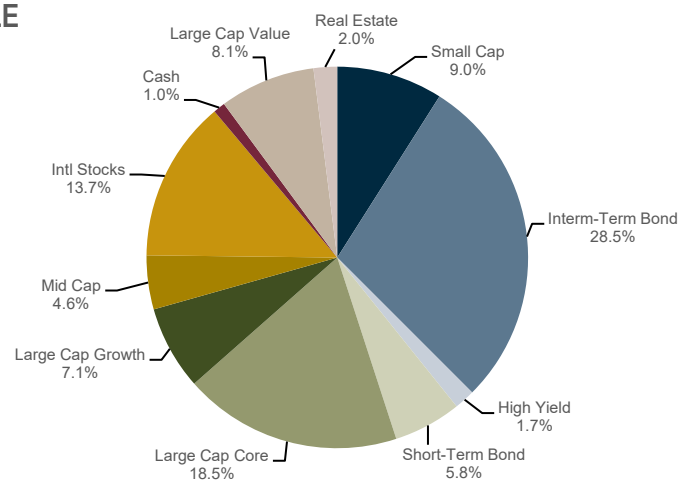
Columbia Contrarian Core I3
Vanguard Growth & Income Adm
Dodge & Cox Stock Fund
iShares S&P 500 Value ETF
Harbor Capital Appreciation - Retirement
T. Rowe Price Growth Stock - I
iShares Russell Mid-Cap ETF
Vanguard Real Estate ETF
Undiscovered Managers Behavioral Value-R6
Victory RS Small Cap Growth - R6
DFA Large Cap International Portfolio
Dodge & Cox International Stock
MFS International Growth - R6
Hartford Schroders Emerging Markets Eq
Vanguard Short-Term Invest-Grade Adm
PIMCO High Yield Instl
PIMCO Total Return Fund - Inst
PGIM Total Return Bond - R6
DoubleLine Core Fixed Income - I
First American Government Obligations Z

Index Plus (Passive)

iShares Core S&P 500 ETF
iShares S&P 500 Value ETF
iShares S&P 500 Growth ETF
iShares Russell Mid-Cap ETF
Vanguard Real Estate ETF
iShares Russell 2000 Value ETF
iShares Russell 2000 Growth ETF
iShares Core MSCI EAFE ETF
Vanguard FTSE Emerging Markets ETF
Vanguard Short-Term Invest-Grade Adm
iShares Core U.S. Aggregate
Vanguard High-Yield Corp Adm
First American Government Obligations Z

Holdings are subject to change at the discretion of the investment manager.

STYLE



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HighMark Tenure: since 1995
Education: BA, Stetson University

Christiane Tsuda
Senior Portfolio Manager
Investment Experience: since 1987
HighMark Tenure: since 2010
Education: BA, International Christian University, Tokyo

Anne Wimmer, CFA®
Senior Portfolio Manager
Investment Experience: since 1987
HighMark Tenure: since 2007
Education: BA, University of California, Santa Barbara

Randy Yurchak, CFA®
Senior Portfolio Manager
Investment Experience: since 2002
HighMark Tenure: since 2017
Education: MBA, Arizona State University; BS, University of Washington

Asset Allocation Committee
Number of Members: 17
Average Years of Experience: 26
Average Tenure (Years): 14

Manager Review Group
Number of Members: 8
Average Years of Experience: 20
Average Tenure (Years): 9

*Assets under management ("AUM") include assets for which HighMark provides continuous and regular supervisory and management services. Assets under advisement ("AUA") include assets for which HighMark provides certain investment advisory services (including, but not limited to, investment research and strategies) for client assets of its parent company, MUFG Union Bank, N.A.

HIGHMARK® CAPITAL MANAGEMENT

PARS DIVERSIFIED PORTFOLIOS

CAPITAL APPRECIATION

Q2 2021

WHY THE PARS DIVERSIFIED CAPITAL APPRECIATION PORTFOLIO?

Comprehensive Investment Solution

HighMark® Capital Management, Inc.'s (HighMark) diversified investment portfolios are designed to balance return expectations with risk tolerance. Key features include: sophisticated asset allocation and optimization techniques, four layers of diversification (asset class, style, manager, and security), access to rigorously screened, top tier money managers, flexible investment options, and experienced investment management.

Rigorous Manager Due Diligence

Our manager review committee utilizes a rigorous screening process that searches for investment managers and styles that have not only produced above-average returns within acceptable risk parameters, but have the resources and commitment to continue to deliver these results. We have set high standards for our investment managers and funds. This is a highly specialized, time consuming approach dedicated to one goal: competitive and consistent performance.

Flexible Investment Options

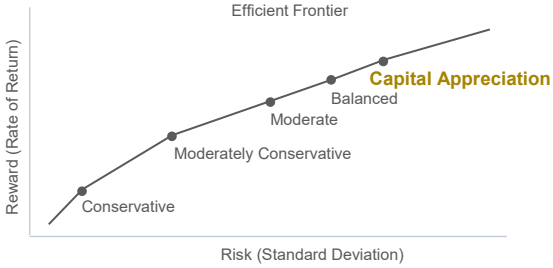
In order to meet the unique needs of our clients, we offer access to flexible implementation strategies: HighMark Plus utilizes actively managed mutual funds while Index Plus utilizes index-based securities, including exchange-traded funds. Both investment options leverage HighMark's active asset allocation approach.

Risk Management

The portfolio is constructed to control risk through four layers of diversification – asset classes (cash, fixed income, equity), investment styles (large cap, small cap, international, value, growth), managers and securities. Disciplined mutual fund selection and monitoring process helps to drive return potential while reducing portfolio risk.

INVESTMENT OBJECTIVE

To provide growth of principal. The major portion of the assets are invested in equity securities and market fluctuations are expected.



ASSET ALLOCATION — CAPITAL APPRECIATION PORTFOLIO

	Strategic Range	Policy	Tactical
Equity	65 - 85%	75%	79%
Fixed Income	10 - 30%	20%	20%
Cash	0 - 20%	5%	1%

ANNUALIZED TOTAL RETURNS

(Gross of Investment Management Fees, but Net of Embedded Fund Fees)

Consolidated Composite	
Current Quarter*	5.97%
Blended Benchmark,***	*5.75%*
Year To Date*	10.83%
Blended Benchmark,***	*10.48%*
1 Year	32.31%
*Blended Benchmark***	*31.54%*
3 Year	13.14%
*Blended Benchmark***	*13.12%*
5 Year	12.64%
*Blended Benchmark***	*12.61%*
10 Year	9.75%
*Blended Benchmark***	*10.06%*

* Returns less than one year are not annualized. **Breakdown for Blended Benchmark: 39.5% S&P500, 7.5% Russell Mid Cap, 10.5% Russell 2000, 5.25% MSCI EM (net), 10.25% MSCI EAFE (net), 16% BBG Barclays US Agg, 3% ICE BofA 1-3 Yr US Corp/Gov't, 1% ICE BofA US High Yield Master II, 2% Wilshire REIT, and 5% FTSE 1 Mth US T-Bill.

ANNUAL RETURNS

(Gross of Investment Management Fees, but Net of Embedded Fund Fees)

Consolidated Composite	
2008	N/A
2009	23.77%
2010	12.95%
2011	-1.35%
2012	13.87%
2013	20.33%
2014	6.05%
2015	-0.27%
2016	8.81%
2017	16.72%
2018	-5.82%
2019	22.62%
2020	14.50%

PORTFOLIO FACTS

Consolidated Composite	
Composite Inception Date	01/2009
No of Holdings in Portfolio	20

HOLDINGS

HighMark Plus (Active)

Columbia Contrarian Core I3
Vanguard Growth & Income Adm
Dodge & Cox Stock Fund
iShares S&P 500 Value ETF
Harbor Capital Appreciation – Retirement
T. Rowe Price Growth Stock - I
iShares Russell Mid-Cap ETF
Vanguard Real Estate ETF
Undiscovered Managers Behavioral Value-R6
Victory RS Small Cap Growth - R6
DFA Large Cap International Portfolio
Dodge & Cox International Stock
MFS International Growth - R6
Hartford Schroders Emerging Markets Eq
Vanguard Short-Term Invest-Grade Adm
PIMCO High Yield Instl
PIMCO Total Return Fund - Inst
PGIM Total Return Bond - R6
DoubleLine Core Fixed Income - I
First American Government Obligations Z

Index Plus (Passive)

iShares Core S&P 500 ETF
iShares S&P 500 Value ETF
iShares S&P 500 Growth ETF
iShares Russell Mid-Cap ETF
Vanguard Real Estate ETF
iShares Russell 2000 Value ETF
iShares Russell 2000 Growth ETF
iShares Core MSCI EAFE ETF
Vanguard FTSE Emerging Markets ETF
Vanguard Short-Term Invest-Grade Adm
iShares Core U.S. Aggregate
Vanguard High-Yield Corp Adm
First American Government Obligations Z

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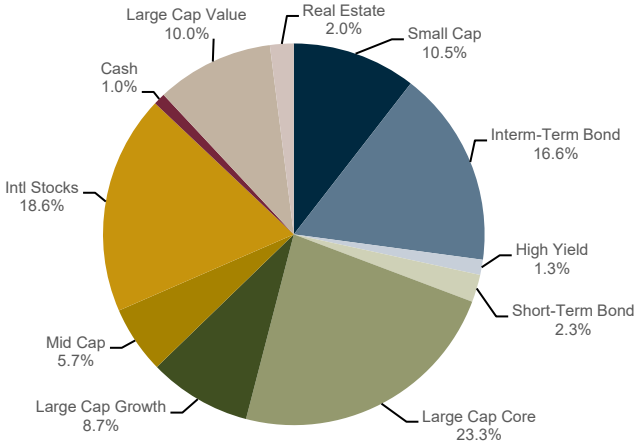

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THREE VALLEYS MWD

Board of Directors
Staff Report

To: TVMWD Board of Directors

From: Matthew H. Litchfield, General Manager

Date: November 3, 2021

Subject: **Pension Trust – Consideration of Additional Contribution and Investment Strategies**

☐	**For Action**	☐	**Fiscal Impact**
☒	**Information Only**	☐	**Funds Budgeted:**

Staff Recommendation:

No Action Necessary – Informational Item Only

Background:

TVMWD provides pension benefits to retirees. Retiree pensions are paid by CalPERS. CalPERS determines how much TVMWD must pay annually and every pay period to meet these future pension obligations.

Discussion - Contribution:

An actuarial valuation is performed annually to determine the current liability for these future obligations. A copy of the most recent valuation and associated calculations to determine TVMWD's share can be provided upon request. TVMWD's total pension liability is $19,963,000.

TVMWD has 3 funding sources to cover this liability:

- CalPERS $15,717,000
- TVMWD Reserves 378,000
- Pension Trust 885,000

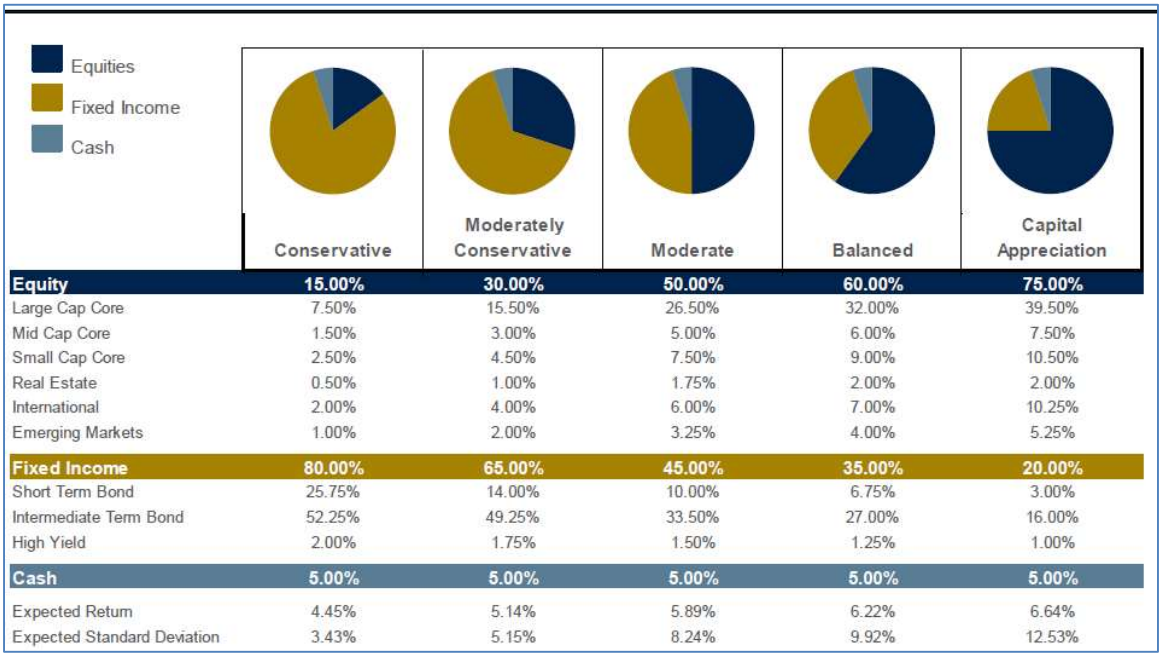
$16,980,000

This reflects that TVMWD total pension obligations are 85% funded. This is great considering CalPERS average funded status is 71%. Our goal is to be 100% funded, which is why TVMWD's board has committed to funding $300,000 annually (starting with FY 21/22) with a goal of being fully funded by 2027.

Staff recommends a contribution to the Pension Trust of $200,000, as was originally planned in the FY 20/21 budget. Staff will bring this recommendation back for consideration at the November 17, 2021 board meeting.

Discussion – Investment Strategy:

The investment manager for the Pension Trust is HighMark Capital Management, who offers the following investment strategies (same as OPEB Trust):



	Conservative	Moderately Conservative	Moderate	Balanced	Capital Appreciation
Equity	**15.00%**	**30.00%**	**50.00%**	**60.00%**	**75.00%**
Large Cap Core	7.50%	15.50%	26.50%	32.00%	39.50%
Mid Cap Core	1.50%	3.00%	5.00%	6.00%	7.50%
Small Cap Core	2.50%	4.50%	7.50%	9.00%	10.50%
Real Estate	0.50%	1.00%	1.75%	2.00%	2.00%
International	2.00%	4.00%	6.00%	7.00%	10.25%
Emerging Markets	1.00%	2.00%	3.25%	4.00%	5.25%
Fixed Income	**80.00%**	**65.00%**	**45.00%**	**35.00%**	**20.00%**
Short Term Bond	25.75%	14.00%	10.00%	6.75%	3.00%
Intermediate Term Bond	52.25%	49.25%	33.50%	27.00%	16.00%
High Yield	2.00%	1.75%	1.50%	1.25%	1.00%
Cash	**5.00%**	**5.00%**	**5.00%**	**5.00%**	**5.00%**
Expected Return	4.45%	5.14%	5.89%	6.22%	6.64%
Expected Standard Deviation	3.43%	5.15%	8.24%	9.92%	12.53%

The Pension Trust has been invested in the Conservative strategy since inception and earned a net return of approximately 5%.

While CalPERS continues to reduce risk and volatility by reducing the discount rate, their strategy is still on the riskier side. To offset this risk by maintaining a more diversified portfolio, staff's recommendation is to remain in the Conservative strategy.

Strategic Plan Objective(s):

3.1 – Utilize and comply with a set of financial policies to maintain TVMWD's financial health

3.3 – Be accountable and transparent with major decisions

Attachment(s):

None

Meeting History:

None

NA/JL

Board of Directors
Staff Report

To: TVMWD Board of Directors

From: Matthew H. Litchfield, General Manager

Date: November 3, 2021

Subject: **Bonanza Springs Study Update**

☐	**For Action**	☐	**Fiscal Impact** **$**
☒	**Information Only**	☐	**Funds Budgeted:**

Staff Recommendation:

No Action Necessary – Informational Item Only

Background:

At the October 20, 2021 Board of Directors ("Board") meeting, Director Soto requested a status update on the Bonanza Springs Study be placed on the November 3, 2021 Board agenda. The Three Valleys Municipal Water District ("TVMWD") Board approved Task Order No. 2 to Aquilogic, Inc. in February 2020 titled "*Proposal to Conduct a Study Program to Evaluate the Hydrologic Connection Between Bonanza Springs and the Alluvial Aquifer in Fenner Valley*" ("Bonanza Springs Study"). Staff indicated at that time that periodic updates on the progress related to the Bonanza Springs Study would be brought to the Board when information is available.

As background, at the June 16, 2021 Board meeting, Director Soto had the following comment read into the record as follows:

"Thank you Chair. I would like to take this time to address the Board and the public on why I called for a vote to review our continued involvement in the Bonanza Springs Study and why I have since pulled that request and now it's discussion here today at the Board level.

I have many entities I consider myself accountable to in varying degrees: my conscience, the public and my fellow board members. Thanks to a few folks I believe I found a way to appease my conscience, provide public disclosure on my views regarding the issue, and not alienate my fellow board members. In this way, I may now be on record of my opinion regarding the appropriateness of Three Valleys Municipal Water District's role with the Bonanza Spring study.

For the past six months we have heard from both sides of the issue and reviewed a significant amount of previously published material on the subject. I believe that the lack of an RFP process was a serious error. I believe that the time to work with stakeholders was at the outset through the formation of an advisory

committee made of a cross section of invested stakeholders, including Native Americans, to structure the study's RFP and make consultant recommendations to the Board.

I believe that it was inappropriate to hire a consulting firm with the lead having already published an Op-Ed favoring a project that the study relates to. At the outset, the study loses its objective value, due to this bias. For me, it holds no credibility.

It is my understanding that there continues to be no work being performed onsite as the Bureau of Land Management has yet to issue any permits for the Study. I ask that should the green light be given by the BLM and permits issued to begin the non-invasive work contemplated in Phases A and B of the Study, that the Study come back to the Board to review our continued involvement with the Bonanza Spring study before the commencement of any physically-destructive onsite work, or if the BLM determines that an Environmental Assessment is necessary in connection with Phase C of the Study then I would like it to come back before the Board as well.

I'm happy to hear any other comments from my fellow board members if they have any and with that, that concludes my remarks. Thank you, Chairman."

Current Status:

At a regularly scheduled monthly conference call on September 15, 2021, between TVMWD staff, BLM staff and Aquilogic, Inc., BLM indicated that the Right of Way Entry Permit for the for the work to be authorized under a Categorical Exemption ("CX") could not be authorized at this time and no definitive date was given as to when said permit could be provided. This is the latest update and staff will continue to engage with BLM staff on the pending permit issuance.

Exhibit A contains a status report prepared by Aquilogic, Inc. summarizing the work completed to date. In addition, TVMWD sent an email dated October 27, 2021 (**Exhibit B**) to the Bureau of Land Management ("BLM") Needles, CA Field Office to confirm BLM's decision in September 2021 to not issue a Right of Way Entry Permit for the work to be authorized under CX. BLM's email response is included in **Exhibit B**.

Strategic Plan Objective(s):

3.3 – Be accountable and transparent with major decisions

Attachment(s):

Exhibit A – Status Report for the Bonanza Springs Study

Exhibit B – Email dated October 27, 2021 from General Manager Litchfield to Mr. Michael Ahrens, Field Manager, BLM Needles Field Office with response from Mr. Ahrens.

Meeting History:

Board of Directors Meeting, April 21, 2021 – Informational Item

Special Board of Directors Meeting, January 27, 2021 – Informational Item

Special Board of Directors Meeting, February 24, 2020 – Action Item

Report of the Independent Peer Review Panel Workshop, October 19, 2019 – Informational Item

Board of Directors Meeting, June 19, 2019 – Action Item

Special Board of Directors Meeting, March 13, 2019 – Informational Item

NA/ML

aquilogic, Inc.
environment • water • strategy

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October 28, 2021

MEMORANDUM

To: Matt Litchfield, PE, Three Valleys Municipal Water District
From: Anthony Brown and Brandon Eisen, **aquilogic**

Subject: **Status Report for the Bonanza Spring Study**
Project No.: 052-03

In February 2020, the Three Valleys Municipal Water District (Three Valleys) approved a study of the Bonanza Spring (the Study) to be conducted by a technical team led by **aquilogic**. Bonanza Spring is located on the southwesterly flank of the Clipper Mountains in the Mojave Desert. The Study will evaluate the extent, if any, of hydrologic connection between Bonanza Spring and the alluvial aquifer in the Fenner Valley below. The Cadiz Valley Water Conservation, Recovery and Storage Project (the Water Project) plans to pump groundwater that originates in the Fenner Valley, approximately 11 miles away and downgradient from the Study area, before it evaporates from the Cadiz and Bristol Dry-Lakes.

A Final Environmental Impact Report (FEIR) was prepared for the Water Project. San Bernardino County also evaluated the Water Project further before adopting a Groundwater Management, Monitoring and Mitigation Plan (GMMMP) to regulate groundwater production. However, some interested parties have raised questions as to whether these studies were sufficient. Therefore, Three Valleys previously authorized an independent review of the GMMMP in October 2018. This review concluded that the GMMMP was sufficient; however, the review also included recommendations most of which focused on additional study of Bonanza Spring. Based on these recommendations, Three Valleys decided to retain **aquilogic** to implement the Study.

The Study will assist Three Valleys in assessing whether the proposed pumping by the Water Project would have any impact on Bonanza Spring, and whether any possible impact can be mitigated. Thus, the Study results will assist Three Valleys in evaluating its participation in the Water Project.

Aquilogic recommended that the scope of the Study be open to collaborative development with all interested parties and stakeholders. Under the agreement with **aquilogic**, Three Valleys initially approved a task order to collaboratively develop a Study Plan in July 2019. Three Valleys then issued a second task order in February 2020 to aquilogic to implement the work described in the Study Plan.

Previously, our August 28, 2020 project status memorandum provided a chronology of activity from February through August 2020. A subsequent memorandum on January 25, 2021 (and accompanying PowerPoint presentation) provided a chronology of activity from August 2020 through January 2021.

In summary, most of our efforts over the past 18 months have been focused on obtaining approvals from the US Bureau of Land Management (BLM) to implement the Study on federally owned land. The Study Plan and Independent Review of the GMMMP were provided to BLM in March 2020. Standard Form 299 and Plans of Development (PODs) for Parts A, B, and C of the Study were submitted to BLM in June 2020. BLM staff have indicated their support for the Study, and BLM has performed a thorough review of the Study over the past 10 months given stakeholder interest in the sensitivity of the Study area. Below updates and summarizes project activity between January 22, 2021 and October 27, 2021.

<u>January 27, 2021</u>

- Provided presentation on the status of the Study and permitting efforts as part of a special Board meeting for Three Valleys.

<u>January 27, 2021</u>

- Received comments from BLM staff (Rose Pettiette [Geologist]and Nina Hemphill [Aquatic Habitat Management]) requesting the following: 1) a comprehensive scientific report of the geophysical assessment at Bonanza Spring upon completion of fieldwork; 2) clarification regarding the location of water level measurement locations within Bonanza Spring; and 3) monitoring data obtained from pressure transducers (water level) and soil moisture/ temperature dataloggers when they are downloaded. **Aquilogic** agreed to comply with these requests.

- Received notice that the US Secretary of the Interior had issued a 60-day temporary suspension nationwide of BLM's delegated authority to grant rights-of-way (ROW) that authorize any ground-disturbing activities.

<u>February 11, 2021</u>

- Received cost recovery determination from BLM (Russell Hansen, Realty Specialist) related to the June 17, 2020 application for a short-term use (STU) ROW "*for the purpose of conducting a geotechnical study within public lands managed by the BLM in the vicinity of Bonanza Spring.*" The cost recovery determination included a cost reimbursement agreement (CRA) for the processing of the STU ROW application by BLM staff.

February 24, 2021

- Completed conference call with BLM staff regarding progress on submittal of CRA. BLM staff stated they could not finalize the categorical exemption (CX) for the geophysical assessment and surface water monitoring until the CRA was completed. Received comments from BLM specialist (Rose Pettiette) regarding aquifer pumping test and historical references to groundwater discharge rates to Bonanza Spring (estimated 3.5 gallons per minute [gpm] in 1981 and "*significantly less than 10 gpm*" in 1929).

March 10, 2021

- No project status call with BLM pending cultural resource study and CRA completion.

March 20, 2021

- The US Department of Interior's 60-day temporary suspension of ROW issuance authority expired.

March 24, 2021

- Conference call (status call) with BLM staff. BLM approved the implementation of a cultural resource survey to support their analysis of the CX. **Aquilogic** requested approval to conduct pre-fieldwork plant and wildlife survey at Bonanza Spring while plants would be in flower (spring season) to support BLM analysis of the CX.

March 25, 2021

- Received approval from BLM staff to conduct plant and wildlife survey at Bonanza Spring.

March 31, 2021

- Submittal of CRA to BLM.

April 6-7, 2021

- Pre-fieldwork plant and wildlife survey completed at Bonanza Spring.

April 7, 2021

- Project status call with BLM. Confirmation of receipt of CRA between Three Valleys and BLM. BLM staff confirmed they had begun preparing the CX for distribution and review by BLM specialists. Discussed that plant and wildlife survey would be completed by the end of day (April 7) and that the cultural and archaeological survey would be completed at Bonanza Spring the following week.

April 12-13, 2021

- Archaeological/cultural survey necessary for CX completed at Bonanza Spring.

May 10, 2021

- BLM project team informed **aquilogic** that all the technical requirements for BLM to issue a permit had been completed, all concerns about possible impacts to Bonanza Spring resulting from the study had been addressed, and the short-term use permit had been approved internally and would be executed in the coming days.

May 15, 2021

- BLM project team informed **aquilogic** that Bonanza Spring study will be discussed as part of a meeting with the BLM State Director.

May 20, 2021

- BLM forwarded a courtesy statement for the initial rent ($724.06) for the period June 1, 2021 to December 31, 2021 in regard to the pending land use permit (CACA 059022), indicating that the permit would be issued before June 1, 2021. The land use permit will be renewable for a period of 3 years, if necessary, with an accompanying rent payment (approximately $1,500 per year).

May 21, 2021

- Received message from BLM project staff that, following the briefing with the BLM State Director, BLM headquarters (HQ) expressed an interest in a briefing on the Bonanza Spring study.

May 24, 2021

- Received comments by BLM archaeologist regarding suggested revisions to geophysical transects with respect to buffer zones near archaeologic resources identified as part of the April 2021 cultural resources survey.

May 25, 2021

- BLM project team informed **aquilogic** that the timeline for study implementation was unknown pending BLM HQ meeting. The date of the BLM HQ meeting had yet to be determined.

June 28, 2021

- BLM project team provided a briefing on the Bonanza Spring study to BLM HQ staff.

July 14, 2021

- BLM project team informed **aquilogic** that there were no updates regarding the Bonanza Spring study permit approval. The briefing from the BLM project team to BLM HQ was completed; however, no findings had been released.

July 21, 2021

- BLM project team informed **aquilogic** that no findings had been released from the June 28, 2021 BLM HQ briefing.

August 18, 2021

- BLM project team informed **aquilogic** that it had received the "go-ahead" from BLM HQ to authorize the Bonanza Spring study, and the short-term use permit would be executed in the coming days.

August 27, 2021

- Ongoing discussion with BLM archaeological staff provided additional information for consideration as part of the Cultural Resources Assessment Report.

September 15, 2021

- BLM staff indicated that all ROW permit requirements had been met and only a signature was required for issuance of a final permit. However, BLM HQ had directed the BLM project team not to take any further action on the Bonanza Spring study; that is, not to sign the approval letter. BLM staff indicated that, until they hear otherwise from BLM HQ, the Bonanza Spring study was on a "temporary hold" for an indefinite period. As a result, the ROW permit was not issued. BLM staff were unable to provide any additional details on what was required to issue the permit or how long the "temporary hold" would last.

October 19, 2021

- Planned status call with BLM project team postponed as no updated information was available regarding the status of the ROW permit.

++++ END++++

Nadia Aguirre

From: Ahrens, Michael W <mahrens@blm.gov>
Sent: Thursday, October 28, 2021 8:02 AM
To: Matthew Litchfield
Subject: Re: [EXTERNAL] Bonanza Springs Study

Thanks for reaching out, Matthew. You provided a good interpretation of our current situation. We have several projects in our office which directly further the Administrations priorities and we have been directed to focus our attention on those projects above all others. Your assessment of the portions of the study which we are considering in the CX is accurate.

Thanks again for your understanding and patience.

Mike Ahrens
Field Manager
BLM, Needles Field Office
Department of Interior, Region 8
1303 S. U.S. Hwy 95
Needles CA 92363
Ph. 760 326 7001
Cell. 760 903 3585 (Note, this number has changed)

Happiness is a choice, but so is misery. Choose wisely!!

From: Matthew Litchfield <mlitchfield@tvmwd.com>
Sent: Wednesday, October 27, 2021 4:11 PM
To: Ahrens, Michael W <mahrens@blm.gov>
Subject: [EXTERNAL] Bonanza Springs Study

Good Afternoon Mike,

In my recent conversations with the Three Valleys Municipal Water District Board of Directors ("Board"), I have relayed to them the Bureau of Land Management's ("BLM") decision to withhold the issuance of the right of way entry permit for any field work to commence on the Bonanza Springs Study ("Study") under a Categorical Exemption ("CX") determination. The rationale I provided the Board for BLM's decision was based on the last monthly meeting with our consultant, Aquilogic, Inc., on September 15, 2021. Specifically, the current Administration's priorities for BLM have changed to "conservation, renewables and solar energy projects". You had also mentioned that the timing of when the

CX determination and permit approval will be is currently unknown. Specifically, the following work elements will be included in the pending CX determination:

(1) the geophysical assessment and surface water monitoring portions of the overall study (Part A);
(2) the ecological assessment portion of the study (Part B); and
(3) the water sampling portion of the study (Part C)

As you probably know, I make reports to the Board on a periodic basis to keep them apprised of the status. That being said, I want to ensure that what I am reporting to them is factual from BLM's standpoint. I don't want my interpretation in the above paragraph to mistakenly be misconstrued (by me) since I may have not heard the conclusion you conveyed in September properly. I would really appreciate it if you could get back to me on this so I can make sure my future reports to the Board are accurate.

I appreciate your attention to this and please don't hesitate to contact me should you need anything. Thx!

THREE VALLEYS MWD

Matthew H. Litchfield, P.E.
General Manager/Chief Engineer

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The mission of Three Valleys Municipal Water District is to supplement and enhance local water supplies to meet our regions' needs in a reliable and cost-effective manner.