



**PUBLIC, LEGISLATIVE AFFAIRS, AND WATER RESOURCES  
COMMITTEE MEETING  
OF THE BOARD OF DIRECTORS  
INLAND EMPIRE UTILITIES AGENCY\*  
AGENCY HEADQUARTERS, CHINO, CALIFORNIA**

**WEDNESDAY, JULY 13, 2016  
9:00 A.M.**

**CALL TO ORDER**

**PUBLIC COMMENT**

Members of the public may address the Board on any item that is within the jurisdiction of the Board; however, no action may be taken on any item not appearing on the agenda unless the action is otherwise authorized by Subdivision (b) of Section 54954.2 of the Government Code. Those persons wishing to address the Board on any matter, whether or not it appears on the agenda, are requested to complete and submit to the Board Secretary a "Request to Speak" form, which are available on the table in the Board Room. Comments will be limited to five minutes per speaker. Thank you.

**ADDITIONS TO THE AGENDA**

In accordance with Section 54954.2 of the Government Code (Brown Act), additions to the agenda require two-thirds vote of the legislative body, or, if less than two-thirds of the members are present, a unanimous vote of those members present, that there is a need to take immediate action and that the need for action came to the attention of the local agency subsequent to the agenda being posted.

**1. ACTION ITEMS**

**A. MINUTES**

The Committee will be asked to approve the Public, Legislative Affairs, and Water Resources Committee meeting minutes of June 8, 2016.

**B. AWARD OF CONTRACT FOR STATE LEGISLATIVE SERVICES**

It is recommended that the Committee/Board:

1. Approve a three-year contract with two additional one-year extensions with West Coast Advisors to provide state legislative consulting services, for a monthly retainer fee of \$9,800, plus approved expenses; and
2. Authorize the General Manager to finalize and execute said contract and potential one-year extensions.

**C. AWARD OF CONTRACTS FOR FEDERAL LEGISLATIVE SERVICES**

It is recommended that the Committee/Board:

1. Approve a three-year contract with two additional one-year extensions with Innovative Federal Strategies, LLC to provide federal legislative consulting services for a monthly retainer fee of \$8,000, plus approved expenses; and
2. Approve a three-year contract with two additional one-year extensions with Agricultural Resources to provide federal legislative consulting services for a monthly retainer fee of \$6,000 through December 31, 2016, and \$3,500 thereafter, plus approved expenses; and
3. Authorize the General Manager to finalize and execute said contracts and potential one-year extensions.

**D. ADOPTION OF CEQA FOR THE IEUA-POMONA-MVWD INTERTIE PROJECT**

It is recommended that the Committee/Board:

1. Adopt the California Environmental Quality Act (CEQA) Initial Study/Mitigated Negative Declaration and Mitigation Monitoring, and reporting Program for the IEUA-Pomona-MVWD Intertie; and
2. Authorize the General Manager to file the Notice of Determination (NOD) with the San Bernardino County and Los Angeles County Clerk of the Board.

**2. INFORMATION ITEMS**

**A. PUBLIC OUTREACH AND COMMUNICATION (WRITTEN)**

**B. LEGISLATIVE REPORTS (WRITTEN)**

1. Innovative Federal Strategies
2. West Coast Advisors
3. Agricultural Resources

**C. CALIFORNIA STRATEGIES MONTHLY REPORT (WRITTEN)**

**D. FEDERAL LEGISLATION MATRIX (WRITTEN)**

**E. STATE LEGISLATION MATRIX (WRITTEN)**

**RECEIVE AND FILE INFORMATION ITEMS**

**F. 4<sup>th</sup> QUARTER PLANNING & ENVIRONMENTAL COMPLIANCE UPDATE (POWERPOINT)**

3. **GENERAL MANAGER'S COMMENTS**
4. **COMMITTEE MEMBER COMMENTS**
5. **COMMITTEE MEMBER REQUESTED FUTURE AGENDA ITEMS**
6. **ADJOURN**

\*A Municipal Water District

In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, please contact the Board Secretary (909-993-1736), 48 hours prior to the scheduled meeting so that the Agency can make reasonable arrangements

Proofed by: 

**DECLARATION OF POSTING**

I, April Woodruff, Board Secretary of the Inland Empire Utilities Agency, A Municipal Water District, hereby certify that a copy of this agenda has been posted by 5:30 p.m. in the foyer at the Agency's main office, 6075 Kimball Avenue, Building A, Chino on Thursday, July 7, 2016.

  
April Woodruff

**ACTION  
ITEM  
1A**





## MINUTES

**PUBLIC, LEGISLATIVE AFFAIRS, AND WATER RESOURCES  
COMMITTEE MEETING  
INLAND EMPIRE UTILITIES AGENCY\*  
AGENCY HEADQUARTERS, CHINO, CA**

**WEDNESDAY, JUNE 8, 2016**

**9:00 A.M.**

### **COMMITTEE MEMBERS PRESENT**

Steven J. Elie, Chair  
Michael Camacho

### **STAFF PRESENT**

P. Joseph Grindstaff, General Manager  
Kathy Besser, Manager of External Affairs  
Elizabeth Hurst, Environmental Resources Planner II  
Sylvie Lee, Manager of Planning and Environmental Resources  
Lisa Morgan-Perales, Senior Water Resources Analyst  
Jason Pivovarov, Senior Engineer  
Craig Proctor, Pretreatment & Source Control Supervisor  
Shaun Stone, Manager of Engineering  
April Woodruff, Board Secretary/Office Manager

### **OTHERS PRESENT**

None.

The meeting was called to order at 9:04 a.m. There were no public comments received or additions to the agenda.

### **ACTION ITEMS**

The Committee:

- ◆ Approved the Public, Legislative Affairs, and Water Resources Committee meeting minutes of May 11, 2016.
- ◆ Recommended that the Board:
  1. Approve the second amendment to Task Order No. 1 of the Master Agreement with the Chino Basin Watermaster as part of the Recharge Master Plan Update Yield Enhancement Projects, Project No. RW15003; and;
  2. Authorize the General Manager, subject to non-substantive changes, to execute the amendment;

as a Consent Calendar Item on the June 15, 2016, Board meeting agenda.

- ◆ Recommended that the Board adopt the 2015 Regional Water Use Efficiency Business Plan;

as a Consent Calendar Item on the June 15, 2016, Board meeting agenda.

- ◆ Recommended that the Board authorize the development of the Programmatic Environmental Impact Report (PEIR) based on the core recommendations in the 2015 Integrated Water Resources Plan (IRP);

as an Action Item on the June 15, 2016, Board meeting agenda.

- ◆ Recommended that the Board:

1. Approve the June 2016 SARCCUP Memorandum of Understanding (MOU);
2. Approve Project Agreement 23 (PA23) between SAWPA and the five SAWPA member agencies for SARCCUP governance;
3. Approve the professional services contact award to Tom Dodson & Associates to conduct a SARCCUP CEQA evaluation for the not-to-exceed amount of \$340,397;
4. Approve the CEQA Cost Sharing Agreement; and
5. Authorize the General Manager to execute the following documents:
  - a. June 2016 SARCCUP MOU
  - b. Project Agreement 23 (PA23)
  - c. Professional Services Contract award to Tom Dodson & Associates
  - d. CEQA Cost Sharing Agreement

as an Action Item on the June 15, 2016, Board meeting agenda.

- ◆ Recommended that the Board adopt the 2016 Chino Basin Storm Water Resources Plan;

as a Consent Calendar Item on the June 15, 2016, Board meeting agenda.

- ◆ Recommended that the Board:

1. Approve the professional services contract award for the Sewer Fee Evaluation to Carollo Engineers, Inc. for the not-to-exceed amount of \$376,586; and
2. Authorize the General Manager to execute the contract;

as an Action Item on the June 15, 2016, Board meeting agenda.

### **INFORMATION ITEMS**

The following information items were presented or received and filed by the Committee:

- ◆ Public Outreach and Communications
- ◆ Legislative Reports
- ◆ California Strategies, LLC Activity Report
- ◆ Federal Legislation Matrix
- ◆ State Legislative Matrix
- ◆ 2015 Regional Urban Water Management Plan
- ◆ Recycled Water Resolutions
- ◆ Planning and Environmental Resources Update

**GENERAL MANAGER'S COMMENTS**

General Manager Joseph Grindstaff had no additional comments.

**COMMITTEE MEMBER COMMENTS**

None.

**COMMITTEE MEMBER REQUESTED FUTURE AGENDA ITEMS**

There were no Committee member requests for future agenda items.

With no further business, Director Elie adjourned the meeting in memory of Director Gene Koopman at 9:58 a.m.

Respectfully submitted,

April Woodruff  
Board Secretary/Office Manager

\*A Municipal Water District  
**APPROVED: JULY 13, 2016**

**ACTION  
ITEM  
1B**

Date: July 20, 2016

To: The Honorable Board of Directors

Through: Public, Legislative Affairs and Water Resources Committee (7/13/16)  
Finance, Legal, and Administration Committee (7/13/16)

From: P. Joseph Grindstaff  
General Manager

Submitted by: Kathy Besser  
Manager of External Affairs

Subject: Award of Contract for State Legislative Services

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### **RECOMMENDATION**

It is recommended that the Board of Directors:

1. Approve a three-year contract with two additional one-year extensions with West Coast Advisors to provide state legislative consulting services, for a monthly retainer fee of \$9,800, plus approved expenses; and
2. Authorize the General Manager to finalize and execute said contract and potential one-year extensions.

### **BACKGROUND**

The Agency currently contracts with West Coast Advisors, formerly known as the Dolphin Group, to provide state legislative services on issues of interest to the Agency and the community it serves, including water resources, renewable energy, water quality, air quality, and funding.

In late 2015, the Public, Legislative Affairs, and Water Resources Committee recommended that Requests for Proposals (RFPs) for state legislative services be circulated in spring 2016, as part of a competitive solicitation process. On March 2, 2016, the RFP was issued via PlanetBids, making it accessible by all interested parties. On March 23, 2016, the Agency received two proposals for state legislative services, one from West Coast Advisors, the current service provider, and one from the Monares Group.

The proposals were reviewed, scored and ranked by an evaluation committee comprised of two Board Members, the Executive Manager of Policy Development, and the Manager of External Affairs. Based on the scoring, it is recommended that the Agency award the state legislative

services contract to West Coast Advisors. West Coast Advisors has served the Agency well on state legislative issues.

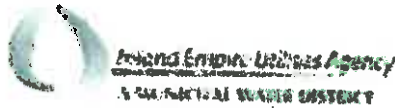
### **PRIOR BOARD ACTION**

On November 14, 2012, the Board of Directors approved a contract with the Dolphin Group through fiscal year 2016.

On May 16, 2012, the Board of Directors approved a six-month extension of the existing contract with the Dolphin Group for the term of July 1, 2012, through December 31, 2012.

### **IMPACT ON BUDGET**

The state legislation consultant service costs are included in the FY 2016/17 Budget, under various program funds: Regional Wastewater Capital Improvement Fund, Recycled Water Fund and Water Resources Fund.



**AGREEMENT NUMBER 4600002123**  
**FOR**  
**STATE LEGISLATIVE LOBBYING SERVICES**

THIS AGREEMENT (the "Agreement"), is made and entered into this 20<sup>th</sup> day of July, 2016, by and between the Inland Empire Utilities Agency, a municipal water district, organized and existing in the County of San Bernardino under and by virtue of the laws of the State of California (hereinafter referred to as "Agency"), and West Coast Advisors, of Sacramento, California, (hereinafter referred to as "Consultant"), for state legislative lobbying services ("Services").

NOW, THEREFORE, in consideration of the mutual promises and obligations set forth herein, the parties agree as follows:

All Agency direction related to this Agreement shall come from the designated person below:

Project Manager: Kathryn Besser  
Address: 6075 Kimball Avenue, Building A  
Chino, California 91708  
Telephone: (909) 993-1638  
Facsimile: (909) 993-1983  
E-mail: [kbesser@ieua.org](mailto:kbesser@ieua.org)

Consultant inquiries shall be directed to the following:

Consultant Contact: Michael Boccadoro  
Address: 925 L. Street, Suite 800  
Sacramento, California 95814  
Telephone: (916) 441-4383  
Cellular: (916) 441-4132  
E-mail: [mboccadoro@westcoastadvisors.com](mailto:mboccadoro@westcoastadvisors.com)

The term of this Agreement shall extend from August 1, 2016, and terminate upon completion of Services, or July 30, 2019, whichever occurs first, unless mutually agreed upon to extend for the option period, which shall be reduced to writing and amended to this Agreement. The options shall include two (2) one-year term extensions upon review of the prior year's services and mutual consent.

The Agency shall pay Consultant's properly executed retainer invoice within thirty (30) calendar days following receipt of said invoice. In compensation for the work represented by this Agreement, Agency shall pay Consultant a firm-fixed fee of **\$9,800.00** per month, for all services provided; plus documented, reasonable and customary business

expenses pre-approved by the Agency. The Scope of Work shall include, but shall not be limited to:

1. Develop and implement a successful legislative strategy for IEUA that addresses issues of interest to IEUA, including coordinating trips to Sacramento for Board and senior staff to meet with legislators and state agency representatives.
2. Identify state legislation of interest to IEUA, monitor action on these initiatives, and advocate the Agency's interest when appropriate.
3. Identify legislation that IEUA may sponsor, and lead the advocacy campaign for successful passage of this legislation, including coordination with other lobbyists;
4. Provide representation before the California Public Utilities Commission and other state agencies on renewable energy programs, funding, energy tariffs, cap and trade regulations and other energy issues of interest to IEUA. Monitor action on these initiatives, and advocate the Agency's interest where appropriate.
5. Represent IEUA in Sacramento in term of communicating IEUA interests to the appropriate elected representatives, key Committee members, state agencies and other individuals as needed.
6. Provide legislative support including briefing papers, talking points, etc., when IEUA Directors or senior staff is requested to testify before a committee or legislative staff, or to meet with Legislators or their staff.
7. Identify potential state funding opportunities, including grant programs that match IEUA's funding needs, and assist with securing funding through appropriate follow-up with the Legislature, state departments and state agencies.
8. Develop and maintain good working relationships between IEUA and the California Legislature, regional and local representatives, key legislative committees, state agencies, departments, commissions, councils and their staff.
9. Advise on presentation of legislative materials. Assist in drafting materials and correspondence.
10. Coordinate appointments or meetings between IEUA, other designated individuals and state legislature and administration leaders.
11. Coordinate legislative activities IEUA member agencies and associations of which IEUA is a member (e.g., Metropolitan Water District of Southern California, Santa Ana Watershed Project Authority, Association of California Water Agency, California Section of the WaterReuse Association, California Association of Sanitary Agencies, and others as identified by IEUA.).



## Deliverables

Consultant shall deliver a written monthly report to the Agency's Project Manager, no fewer than eight (8) business days prior to the second Wednesday of each month, documenting Consultant's activities on behalf of Agency, a matrix of legislation of interest to the Agency, including, but not limited to, legislation on which the Agency has taken a position, highlighting areas of interest for the Agency and identifying achievements as they relate to IEUA's goals, objectives and legislative strategy. Additionally, Consultant shall provide any additional reports requested, on an as-needed basis, which may include; personal briefings to the Agency's Board of Directors and staff, information alerts and bulletins on legislation, rules and regulations or other State policies or programs that affect the Agency either directly or indirectly.

No other work is authorized under this agreement. Should Consultant recommend another consultant or contractor to perform Agency-requested services, the Agency shall contract with such firm in the best interest of the Agency. No additional fees shall be paid to Consultant.

Consultant shall furnish the Agency with certificates of insurance, endorsing the Agency as an additional insured, with the following coverage's: General Liability of \$1,000,000, and Automobile of \$500,000, combined single limits per occurrence for bodily injury, personal injury and property damage; as well as Workers' compensation limits as required by the Labor Code of the State of California and employers Liability limits of \$1,000,000 per accident. Additionally, Consultant shall provide Professional Liability insurance in the amount of \$1,000,000 per claim. The certificates and endorsements for each insurance policy are to be signed by a person authorized by that insurer to bind coverage on its behalf. All certificates and endorsements are to be approved by the Agency before activity commences.

The Consultant shall indemnify Agency, its directors, employees, agents, and assigns, and shall defend and hold them harmless from all liability, demands, actions, claims, losses and expenses, including reasonable attorney's fees, which arise out of or are related to the negligence, recklessness or willful misconduct of Consultant, its directors, employees, agents and assigns, in the performance of Consultant's work completed under this Agreement.

The Consultant is retained as an independent Consultant only, for the sole purpose of rendering the services described herein, and is not an employee of the Agency.

The Agency reserves the right to immediately suspend, cancel or terminate this Agreement at any time upon written notice to the Consultant. In the event of such termination, the Agency shall pay Consultant for all authorized and Consultant-invoiced services up to the date of such termination.

IN WITNESS WHEREOF, the parties hereto have caused the Contract to be entered as of the day and year written above.

INLAND EMPIRE UTILITIES AGENCY:  
A Municipal Water District

WEST COAST ADVISORS:

\_\_\_\_\_  
P. Joseph Grindstaff  
General Manager

(Date)

*M. Boccadoro*

\_\_\_\_\_  
Michael Boccadoro  
President

*6-7-16*

(Date)

Public, Legislative Affairs, and Water Resources Committee

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**ACTION  
ITEM  
1C**





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Date: July 20, 2016

To: The Honorable Board of Directors

Through: Public, Legislative Affairs and Water Resources Committee (07/13/16)  
Finance, Legal and Administration Committee (07/13/16)

From: P. Joseph Grindstaff  
General Manager 

Submitted by: Kathy Besser   
Manager of External Affairs

Subject: Award of Contracts for Federal Legislative Services

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### **RECOMMENDATION**

It is recommended that the Board of Directors:

1. Approve a three-year contract with two additional one-year extensions with Innovative Federal Strategies, LLC to provide federal legislative consulting services for a monthly retainer fee of \$8,000, plus approved expenses;
2. Approve a three-year contract with two additional one-year extensions to Agricultural Resources to provide federal legislative consulting services for a monthly retainer fee of \$6,000 through December 31, 2016, and \$3,500 thereafter, plus approved expenses; and
3. Authorize the General Manager to finalize and execute said contracts and potential one-year extensions.

### **BACKGROUND**

The Agency currently contracts with Innovative Federal Strategies and Agricultural Resources to provide federal legislative services on issues of interest to the Agency and the community it serves, including water resources, renewable energy, water quality, air quality, and funding.

In late 2015, the Public, Legislative Affairs and Water Resources Committee recommended that Requests for Proposals (RFPs) for federal legislative services be circulated in spring 2016 as part of a competitive bid process. On March 2, 2016, Agency staff publicly advertised a RFP to provide federal legislative services.

On March 23, 2016, the Agency received nine proposals for federal legislative services from the following: Agricultural Resources, Best Best & Krieger, Carmen Group/Kadesh & Associates, Carpi & Clay, Cassidy & Associates, Duane Morris, the Furman Group, Innovative Federal Strategies, and Potomac Partners. The proposals were reviewed, scored and ranked by an evaluation committee comprised of two Board Members, the Executive Manager of Policy Development, and the Manager of External Affairs. Follow-up interviews were conducted with five of the firms on May 25, 2016. The interview committee was comprised of the two Board Members, the General Manager, the Executive Manager of Policy Development, and the Manager of External Affairs. The legislative consultants were ranked based on relevant firm experience, capability, resources, key personnel qualifications, approach/methodology, fees, and contract exceptions. The following table identifies the combined ranking and associated fees of the five firms interviewed.

<b>Firm</b>	<b>Ranking</b>	<b>Monthly Fee</b>
<b>Agricultural Resources</b>	1	\$6,000
<b>Carmen Group/ Kadesh &amp; Associates</b>	4	\$10,000
<b>The Furman Group</b>	2	\$12,500
<b>Innovative Federal Strategies</b>	1	\$8,000
<b>Potomac Partners</b>	3	\$9,000

Based on the overall ranking it is recommended that contracts for the provision of legislative services be approved with Innovative Federal Strategies and Agricultural Resources. Key considerations that went into this recommendation are the following:

- The track record of success that these two firms have achieved for IEUA over the past 16 years. Working together, they have assisted the Agency in securing over \$37 million in federal grants since 2000. This funding has been vital to the financing of the Regional Recycled Water Program, the Desalters and other water management activities.
- The approach outlined in the interviews for their vision of how IEUA should move forward with its legislative program. Both firms provided a detailed assessment of the challenges and opportunities facing IEUA, emphasizing the need for renewed engagement with our delegation both locally and in Washington, DC and ideas for how to move forward.
- The knowledge and effectiveness of these firms in their collaboration with other water agency representatives within our region and in Washington, DC and their relationships with the congressional delegation that represents IEUA's service area.

Staff discussed whether IEUA should continue to contract with two firms. The conclusion was that the effective collaboration between these two smaller firms achieved a depth and breadth in the Agency's legislative strategy that would be difficult to replicate even through the resources of a very large firm. The combination of the two firms' talents and expertise more effectively support the Agency's initiatives.

If approved, the total monthly fees would be \$14,000 per month through December 31, 2016 and \$11,500 thereafter.

In summary, Innovative Federal Strategies and Agricultural Resources knowledge and expertise, combined with their strong working relationships with our federal delegation and effective collaboration with our partner agencies within IEUA's service area, makes them the best choices to provide federal legislative services for the Agency.

#### **PRIOR BOARD ACTION**

On January 13, 2013, the Board of Directors approved contracts with Innovative Federal Strategies, LLC and Agricultural Resources through fiscal year 2016.

On May 16, 2012, the Board of Directors approved six-month extensions of existing contracts with Agricultural Resources and Innovative Federal Strategies, LLC for the term July 1, 2012, through December 31, 2012.

#### **IMPACT ON BUDGET**

The related federal legislative consultant services expenses have been included in the FY 2016/17 Budget, under various program funds, including Administrative Service Fund, Regional Wastewater Capital Improvement Fund, Recycled Water Fund, and Water Resources Fund.



**AGREEMENT NUMBER 4600002124  
FOR  
FEDERAL LEGISLATIVE ADVOCACY SERVICES**

**THIS AGREEMENT** (the "Agreement") is made and entered into this 20th day of July 2016, by and between the Inland Empire Utilities Agency, a municipal water district, organized and existing in the County of San Bernardino under and by virtue of the laws of the State of California (hereinafter referred to as "Agency"), and Innovative Federal Strategies, LLC of Washington, DC (hereinafter referred to as "Consultant"), for federal legislative advocacy services ("Services"), as required and directed by the Agency.

The term of this Agreement shall extend from August 1, 2016 and terminate upon completion of Services, or July 30, 2019, whichever occurs first, unless the optional term extension is exercised, agreed to by both parties, reduced to writing and amended to this Agreement. The Agreement may be extended by two additional one-year term extensions.

The Agency shall pay Consultant's properly executed retainer invoices within thirty (30) calendar days following receipt of said invoices. In compensation for the work represented by this Agreement, Agency shall pay Consultant's retainer fee of **\$8,000.00** per calendar month throughout the term of this Agreement for all services provided; plus documented, reasonable and customary business expenses approved by the Agency. All expenses shall be submitted with receipts. The Scope of Work shall include, but shall not be limited to:

**BASIC SERVICE: ASSISTANCE IN SECURING FUNDING FOR IEUA & REGIONAL RESOURCE PROJECTS**

1. Identify potential federal funding opportunities that match the Agency's funding needs.
2. Secure funding for Agency projects through the appropriations process and provide follow-up support on competitive applications.
3. Work with Agency staff in the identification and application of grants offered by federal agencies. Draft funding/grant applications in collaboration with the Agency.
4. Advise on presentation (organization, formatting, etc.) of legislative materials. Assist in drafting materials and correspondence.

5. Monitor and facilitate the progress of funding/grant applications through appropriate federal agencies on behalf of the Agency, when requested.
6. Develop and maintain good working relationships between the Agency and California congressional delegation, key congressional committees, and the Executive Branch. Assist with developing relationships with newly elected officials.
7. Develop and implement a successful strategy for the Agency, including coordinating strategic trips to Washington D.C., to meet with legislators and federal agency representatives.
8. Coordinate appointments or meetings between Agency Board Members, Executives, or other designated individuals, and Congressional leaders.

#### **ADDITIONAL SERVICES: LEGISLATIVE BILL TRACKING AND ADVOCACY**

1. Identify federal legislation of interest to the Agency, monitor action on these initiatives, and advocate the Agency's interest, when appropriate. Provide a matrix of legislation of interest to the Agency, including, but not limited to, legislation on which the Agency has taken a position, no fewer than eight (8) business days prior to the second Wednesday of every month.
2. Represent Agency in Washington D.C. to communicate Agency's interests to the appropriate elected representatives, key Committee members, federal agencies and other individuals, as needed.
3. Provide support including briefing papers, talking points, etc. when Agency officials are requested to testify before a committee or legislative staff.

#### **ADDITIONAL SERVICES: COMMUNICATIONS/UPDATES**

1. Provide written monthly updates no fewer than eight (8) business days prior to the second Wednesday of every month, and quarterly status reports on the firm's achievements as they relate to the Agency's goals and objectives.
2. Other required reports may include, but not necessarily be limited to, personal briefings and information bulletins pertinent to any legislation, rules, or regulations and other Federal policies or programs that affect the Agency and its service area either directly or indirectly.
3. Travel to the Agency's Headquarters may be required for briefings and meetings with the Agency's Board of Directors, Executive Management, and/or staff as needed and directed.



No other work is authorized under this agreement. Should Consultant recommend another consultant or contractor to perform required services, the Agency shall contract with such firm in the best interest of the Agency. No additional fees shall be paid to Consultant.

Consultant shall furnish the Agency with certificates of insurance, endorsing the Agency as an additional insured, with the following coverage's: General Liability of \$1,000,000, and Automobile of \$500,000, combined single limits per occurrence for bodily injury, personal injury and property damage. Additionally, Consultant shall provide Professional Liability insurance in the amount of \$1,000,000 per claim. The certificates and endorsements for each insurance policy are to be signed by a person authorized by that insurer to bind coverage on its behalf. All certificates and endorsements are to be approved by the Agency before activity commences.

The Consultant shall indemnify Agency, its directors, employees, agents, and assigns, and shall defend and hold them harmless from all liability, demands, actions, claims, losses and expenses, including reasonable attorney's fees, which arise out of or are related to the negligence, recklessness or willful misconduct of Consultant, its directors, employees, agents and assigns, in the performance of Consultant's work completed under this Agreement.

The Consultant is retained as an independent Consultant only, for the sole purpose of rendering the services described herein, and is not an employee of the Agency.

The Agency reserves the right to immediately suspend, cancel or terminate this Agreement at any time upon written notice to the Consultant. In the event of such termination, the Agency shall pay Consultant for all authorized and Consultant-invoiced services and approved expenses up to the date of such termination.

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be entered as of the day and year written above.

INLAND EMPIRE UTILITIES AGENCY: INNOVATIVE FEDERAL STRATEGIES, LLC:  
A Municipal Water District

\_\_\_\_\_  
P. Joseph Grindstaff  
General Manager

\_\_\_\_\_  
(Date)

  
\_\_\_\_\_  
Letitia H. White  
Partner

6/13/16  
(Date)

**ACTION  
ITEM  
1D**

Date: July 20, 2016

To: The Honorable Board of Directors

Through: Public, Legislative Affairs, and Water Resources Committee (07/13/16)

From: P. Joseph Grindstaff  
General Manager

Submitted by: Chris Berch  
Executive Manager of Engineering/Assistant General Manager

for Sylvie Lee  
Manager of Planning and Environmental Resources

Subject: Adoption of CEQA for the IEUA-Pomona-MVWD Intertie Project

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### **RECOMMENDATION**

It is recommended that the Board of Directors:

1. Adopt the California Environmental Quality Act (CEQA) Initial Study/Mitigated Negative Declaration and Mitigation Monitoring, and Reporting Program for the IEUA-Pomona-MVWD Intertie; and
2. Authorize the General Manager to file the Notice of Determination (NOD) with the San Bernardino County and Los Angeles County Clerk of the Board.

### **BACKGROUND**

The City of Pomona (Pomona), Monte Vista Water District (MVWD), and the Inland Empire Utilities Agency (IEUA) have collaboratively initiated a Recycled Water Feasibility Study (Study) to evaluate future opportunities to increase the water supply within the region. In the Integrated Water Resources Plan (IRP), the interagency connection was identified as a potential additional water supply. The study is evaluating the viability of potential supply sources and interconnections to convey treated recycled water to direct use recycled water customers, groundwater recharge basins, and aquifer storage and recovery wells. The Study will also consider mitigation of existing and future land subsidence conditions in the cities of Pomona and Montclair. The top ranking project alternatives are being analyzed in detail to determine the most cost effective and beneficial interagency project alternative.

The Study includes projects consisting of a pipeline conveyance system, a booster pump station, and a new advanced water treatment facility to support the increased demand for recycled water and groundwater recharge within the region. Recycled water from the Pomona Water Reclamation Plant (PWRP) and groundwater from Pomona's Spadra Well 19 would be conveyed from the City of Pomona to the existing Montclair recharge basin. The project would improve groundwater supply and provide a new water source. The project would also allow for expandability to include aquifer storage and recovery wells for injection. Other variations of this project are included in the project alternative analysis within the Study.

The three parties are jointly preparing the Study and will equally share the cost of the Study. The California Environmental Quality Act (CEQA) documents have been prepared in this early stage of the project to apply for Proposition 1 Grant and State Revolving Fund loan from the State Water Resources Control Board. IEUA is the lead agency in the preparation of documentation for the CEQA process. The CEQA package has been prepared by Tom Dodson & Associates, and includes the following documents:

- Initial Study/Mitigated Negative Declaration (IS/MND)
- Mitigation, Monitoring, and Reporting Program (MMRP)
- Notice of Determination (NOD)

The IS/MND concludes that the IEUA-Pomona-MVWD Intertie Project can be implemented by using the mitigation measures defined in the Mitigation, Monitoring, and Reporting Program. The required 30-day public review of the IS/MND was completed on June 14, 2016, where three (3) comment letters were received from the State Water Resources Control Board and the Department of Transportation. These comments ranged from pre-construction permits to tribal coordination. The responses to the comments were noted and incorporated into the final IS/MND documentation. These final documents require board adoption and the issuance of a NOD for state filing.

Adopting the recommended CEQA findings and mitigation measures for the IEUA-Pomona-MVWD Intertie Project is consistent with the IEUA business goal of *Water Reliability* by providing new water supplies and maximizing the beneficial reuse of recycled water through the enhancement of groundwater recharge.

### **PRIOR BOARD ACTION**

On July 15, 2015, the Board approved the Memorandum of Understanding for the Recycled Water Intertie with Monte Vista Water District and City of Pomona.

### **IMPACT ON BUDGET**

None.

Adoption of CEQA for the IEUA-Pomona-MVWD Intertie Project

July 20, 2016

Page 3 of 3

**Attachments:**

Attachment 1: Initial Study

Attachment 2: Comments and Responses

Attachment 3: Mitigation, Monitoring, and Reporting Program

Attachment 4: Notice of Determination

Attachment 5: Mitigated Negative Declaration

# ATTACHMENT 1:

## Initial Study

**NOTICE OF INTENT TO  
ADOPT A MITIGATED NEGATIVE DECLARATION**

To: **San Bernardino County** and **Los Angeles County**  
Clerk of the Board  
385 North Arrowhead Avenue  
San Bernardino, CA 92415  
and **Office of Planning and Research**  
State Clearinghouse  
1400 Tenth Street  
Sacramento, CA 95814

From: **Inland Empire Utilities Agency**  
6075 Kimball Avenue  
Chino, CA 91708

**Subject: Filing of Notice of Intent to Adopt a Mitigated Negative Declaration in compliance with Section 21092.3 of the Public Resources Code.**

**Project Title**

IEUA Pomona Intertie Project

---

<u>Not Yet Assigned</u>	<u>Sylvie Lee, P.E.</u>	<u>(909) 993-1600</u>
State Clearinghouse Number	Lead Agency Contact Person	Telephone Number

**Project Location**

The project regional pipeline would begin in the City of Pomona, traverse east to the City of Montclair, and would discharge into the Montclair Basin. The proposed regional pipeline will be located along the following street segments: Erie Street between Mt Vernon Ave and Orange Grove Ave in Pomona where the proposed pipeline meets the proposed booster pump station and continues on Orange Grove Ave between Erie Street and Garey Avenue in Pomona; McKinley Avenue between Garey Avenue and Towne Avenue in Pomona, Towne Avenue between McKinley Avenue and Lincoln Avenue in Pomona; Lincoln Avenue which becomes Orchard Street between Towne Avenue and Ramona Avenue in both Montclair and Pomona; and Ramona Avenue between Orchard Street and Palo Verde Street in Montclair where it meets the proposed advanced water treatment site at the corner of Palo Verde Street and Ramona Avenue. From the proposed advanced water treatment site the proposed regional pipeline travels to the Montclair Groundwater Recharge Basin from Palo Verde Street at Ramona Avenue in Montclair to Helena Avenue where the proposed regional pipeline travels under the I-10 freeway to end at the Montclair Groundwater Recharge Basin. There are two proposed locations for the pump station, Alternative 1 would be located within an empty, disturbed lot on the westside of Erie Street between West Holt Avenue and West Orange Grove Avenue (APN 8355017006) and Alternative 2 would be located within an empty, disturbed lot on the southwest corner of North Orange Grove Avenue and East McKinley Avenue (APN 8339020028).

**Project Description**

The proposed project includes the construction of a recycled water pipeline, booster pump station, and advanced water treatment facility. The purpose of the project is to improve the groundwater replenishment system within IEUA's service area. The project would serve to consolidate wastewater treatment service in the area by maximizing the recovery of water supply from brine sources within the City of Pomona, IEUA, and Monte Vista Water District service areas.

**Notice of Intent to Adopt a Mitigated Negative Declaration  
Page 2 of 2**

**Proposed Review Process**

A capital improvement project such as the proposed project is a discretionary decision or "project" that requires evaluation under the California Environmental Quality Act (CEQA). This Mitigated Negative Declaration is the proposed CEQA determination for this project. Inland Empire Utilities Agency acting as the CEQA lead agency for this project will consider adoption of this Mitigated Negative Declaration at a future scheduled public meeting.

After public review of the Initial Study is completed, IEUA proposes to adopt a Mitigated Negative Declaration in accordance with CEQA and the State CEQA Guidelines. Any parties that comment on this proposed Mitigated Negative Declaration will be notified of the meeting date where adoption of the Mitigated Negative Declaration will be considered. Copies of the Mitigated Negative Declaration/Initial Study are available for review at the IEUA's office located at 6075 Kimball Avenue, Chino, CA 91708. The proposed Mitigated Negative Declaration will be available for public review and comment from May 16, 2016 through June 14, 2016. Any comments you have must be submitted in writing no later than June 14, 2016.

---

	<i>Manager of Planning</i>	<i>5/11/2016</i>
Signature	Title	Date



**Notice of Completion & Environmental Document Transmittal**

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0813  
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814 — 916/445-0813

SCH # \_\_\_\_\_

**Project Title:** IEUA POMONA INTERTIE PROJECT

Lead Agency Inland Empire Utilities Agency Contact Person Sylvie Lee, P.E.  
Mailing Address 6075 Kimball Avenue Phone (909) 993-1600  
City Chino Zip 91708 County San Bernardino County

**Project Location:** County Los Angeles & San Bernardino City/Nearest Community Pomona and Montclair  
Eric Street / Orange Grove Ave / McKinley Ave  
Cross Streets Lincoln Ave / Ramona Ave Zip Code N/A  
Lat. / Long. general area 34° 2' 71" N / 117° 28' 36" W Total Acres ~20 acres  
Assessor's Parcel No APN 8355017006 and APN 8339020028 Sections \_\_\_\_\_  
Within 2 miles: State Hwy # I-10 Waterways San Antonio Creek  
Airports N/A Railways N/A Schools N/A

**Document Type:**

- CEQA:  NOP  Draft EIR NEPA:  NOI Other:  Joint Document  
 Early Cons  Supplement/Subsequent EIR  EA  Final Document  
 Neg Dec (Prior SCH No.)  Draft EIS  Other \_\_\_\_\_  
 Mit Neg Dec  Other \_\_\_\_\_

**Local Action Type:**

- General Plan Update  Specific Plan  Rezone  Annexation  
 General Plan Amendment  Master Plan  Prezone  Redevelopment  
 General Plan Element  Planned Unit Development  Use Permit  Coastal Permit  
 Community Plan  Site Plan  Land Division (Subdivision, etc.)  Other Recycled Water Pipeline/Booster Pump Station & AWTF

**Development Type:**

- Residential: Units \_\_\_\_\_ Acres \_\_\_\_\_  Water Facilities: Type Pipeline and Water Treatment Facility  
 Office: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  Transportation: Type \_\_\_\_\_  
 Commercial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  Mining: Mineral \_\_\_\_\_  
 Industrial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  Power: Type \_\_\_\_\_ Watts \_\_\_\_\_  
 Education \_\_\_\_\_  Waste Treatment: Type \_\_\_\_\_ MGD \_\_\_\_\_  
 Recreational \_\_\_\_\_  Hazardous Waste: Type \_\_\_\_\_  
 Other: \_\_\_\_\_

**Project Issues Discussed in Document:**

- Aesthetics / Visual  Fecal  Recreation / Parks  Vegetation  
 Agricultural Land  Floodplain / Flooding  Schools / Universities  Water Quality  
 Air Quality  Forest Land / Fire Hazard  Septic Systems  Water Supply / Groundwater  
 Archaeological / Historical  Geologic / Seismic  Sewer Capacity  Wetland/Riparian  
 Biological Resources  Minerals  Soil Erosion / Compaction / Grading  Wildlife  
 Coastal Zone  Noise  Solid Waste  Growth Inducing  
 Drainage / Absorption  Population / Housing Balance  Toxic / Hazards  Land Use  
 Economic / Jobs  Public Services / Facilities  Traffic / Circulation  Cumulative Effects  
 Other \_\_\_\_\_

**Present Land Use / Zoning / General Plan Designation:**

General Plan Urban Neighborhood, Activity Center, Residential Neighborhood, Low Residential, Public/Quasi Public and Conservation Basins  
Zoning Light Industrial (M-1), Corridors Specific Plan (CSP), Single Family (R-1-6000), Single Family (R-1-7200), and Single-Family Residential (R1)

**Project Description:** The proposed project includes the construction of a recycled water pipeline, booster pump station, and advanced water treatment facility. The purpose of the project is to improve the groundwater replenishment system within IEUA's service area. The project would serve to consolidate wastewater treatment service in the area by maximizing the recovery of water supply from brine sources within the City of Pomona, IEUA, and Monte Vista Water District service areas.

**Reviewing Agencies Checklist**

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".  
If you have already sent your document to the agency please denote that with an "S".

- |   |   |
|---|---|
| <input type="checkbox"/> Air Resources Board                                  | <input type="checkbox"/> Office of Historic Preservation                                    |
| <input type="checkbox"/> Boating / Waterways, Department of                   | <input type="checkbox"/> Office of Public School Construction                               |
| <input type="checkbox"/> California Highway Patrol                            | <input type="checkbox"/> Parks & Recreation   |
| <input checked="" type="checkbox"/> Caltrans District # <u>7-LA and 8-SBD</u> | <input type="checkbox"/> Pesticide Regulation, Department of                                |
| <input type="checkbox"/> Caltrans Division of Aeronautics                     | <input type="checkbox"/> Public Utilities Commission  |
| <input type="checkbox"/> Caltrans Planning (Headquarters)                     | <input type="checkbox"/> Reclamation Board  |
| <input type="checkbox"/> Coachella Valley Mountain Conservancy                | <input checked="" type="checkbox"/> Regional WQCB, # <u>8-Santa Ana &amp; 4-Los Angeles</u> |
| <input type="checkbox"/> Coastal Commission                                   | <input type="checkbox"/> Resources Agency   |
| <input type="checkbox"/> Colorado River Board                                 | <input type="checkbox"/> S.F. Bay Conservation & Development Commission                     |
| <input type="checkbox"/> Conservation, Department of                          | <input type="checkbox"/> San Gabriel & Lower L.A. Rivers & Mtns Conservancy                 |
| <input type="checkbox"/> Corrections, Department of                           | <input type="checkbox"/> San Joaquin River Conservancy                                      |
| <input type="checkbox"/> Delta Protection Commission                          | <input type="checkbox"/> Santa Monica Mountains Conservancy                                 |
| <input type="checkbox"/> Education, Department of                             | <input type="checkbox"/> State Lands Commission   |
| <input type="checkbox"/> Energy Commission                                    | <input checked="" type="checkbox"/> SWRCB: Clean Water Grants                               |
| <input checked="" type="checkbox"/> Fish & Wildlife, Region # <u>6</u>        | <input type="checkbox"/> SWRCB: Water Quality   |
| <input type="checkbox"/> Food & Agriculture, Department of                    | <input type="checkbox"/> SWRCB: Water Rights  |
| <input type="checkbox"/> Forestry & Fire Protection                           | <input type="checkbox"/> Tahoe Regional Planning Agency                                     |
| <input type="checkbox"/> General Services, Department of                      | <input type="checkbox"/> Toxic Substances Control, Department of                            |
| <input type="checkbox"/> Health Services, Department of                       | <input checked="" type="checkbox"/> Water Resources, Department of                          |
| <input type="checkbox"/> Housing & Community Development                      | <input type="checkbox"/> Other _____  |
| <input type="checkbox"/> Integrated Waste Management Board                    | <input type="checkbox"/> Other _____  |
| <input checked="" type="checkbox"/> Native American Heritage Commission       |   |
| <input type="checkbox"/> Office of Emergency Services                         |   |

-----  
**Local Public Review Period (to be filled in by lead agency)**

Starting Date May 16, 2016 Ending Date June 14, 2016

-----  
**Lead Agency (complete if applicable)**

Consulting Firm: <u>Tom Dodson &amp; Associates</u>	Applicant: <u>Inland Empire Utilities Agency</u>
Address: <u>2150 N. Arrowhead Avenue</u>	Address: <u>6075 Kimball Avenue</u>
City/State/Zip: <u>San Bernardino, CA 92405</u>	City/State/Zip: <u>Chino, CA 91708</u>
Contact: <u>Tom Dodson</u>	Contact: <u>Sylvia Lee, P.E.</u>
Phone: <u>(909) 882-3612</u>	Phone: <u>(909) 993-1600</u>

-----  
**Signature of Lead Agency Representative:**

 Manager of Planning 5/11/2016  
Signature Title Date

## DRAFT MITIGATED NEGATIVE DECLARATION

**Lead Agency:** Inland Empire Utilities Agency  
6075 Kimball Avenue  
Chino, CA 91708

**Contact:** Sylvie Lee, P.E.  
**Phone:** (909) 993-1600  
**Email:** slee@ieua.org

**Project Title:** IEUA POMONA INTERTIE PROJECT

**State Clearinghouse Number:** Not yet assigned

**Project Location:** The project regional pipeline would begin in the City of Pomona, traverse east to the City of Montclair, and would discharge into the Montclair Basin. The proposed regional pipeline will be located along the following street segments: Erie Street between Mt Vernon Ave and Orange Grove Ave in Pomona where the proposed pipeline meets the proposed booster pump station and continues on Orange Grove Ave between Erie Street and Garey Avenue in Pomona, McKinley Avenue between Garey Avenue and Towne Avenue in Pomona, Towne Avenue between McKinley Avenue and Lincoln Avenue in Pomona; Lincoln Avenue which becomes Orchard Street between Towne Avenue and Ramona Avenue in both Montclair and Pomona; and Ramona Avenue between Orchard Street and Palo Verde Street in Montclair where it meets the proposed advanced water treatment site at the corner of Palo Verde Street and Ramona Avenue. From the proposed advanced water treatment site the proposed regional pipeline travels to the Montclair Groundwater Recharge Basin from Palo Verde Street at Ramona Avenue in Montclair to Helena Avenue where the proposed regional pipeline travels under the I-10 freeway to end at the Montclair Groundwater Recharge Basin. There are two proposed locations for the pump station, Alternative 1 would be located within an empty, disturbed lot on the westside of Eerie Street between West Holt Avenue and West Orange Grove Avenue (APN 8355017006) and Alternative 2 would be located within an empty, disturbed lot on the southwest corner of North Orange Grove Avenue and East McKinley Avenue (APN 8339020028).

**Project Description:** The proposed project includes the construction of a recycled water pipeline, booster pump station, and advanced water treatment facility. The purpose of the project is to improve the groundwater replenishment system within IEUA's service area. The project would serve to consolidate wastewater treatment service in the area by maximizing the recovery of water supply from brine sources within the City of Pomona, IEUA, and Monte Vista Water District service areas.

**Finding:** Inland Empire Utilities Agency's (IEUA) decision to facilitate implementation of this proposed project is a discretionary decision or "project" that requires evaluation under the California Environmental Quality Act (CEQA). Based on the information in the project Initial Study, IEUA has made a *preliminary* determination that a Mitigated Negative Declaration will be the appropriate environmental determination for this project to comply with CEQA.

**Initial Study:** Copies of the Mitigated Negative Declaration/Initial Study are available for public review at the IEUA's office located at 6075 Kimball Avenue, Chino, CA 91708. The proposed Mitigated Negative Declaration will be available for public review and comment from May 16, 2016 through June 14, 2016. Any comments you have must be submitted in writing no later than June 14, 2016.

**Mitigated Negative Declaration**  
**Page 2 of 2**

**Mitigation Measures:** All mitigation measures identified in the Initial Study are summarized on pages 95-99 and are proposed for adoption as conditions of the project. These measures will be implemented through a mitigation monitoring and reporting program if the Mitigated Negative Declaration is adopted.

**DRAFT**  
*Signature*

*Title*

*Date*

---

**INITIAL STUDY**  
**FOR THE**  
**POMONA INTERTIE PROJECT**

---

Prepared for:

**Inland Empire Utilities Agency**  
6075 Kimball Avenue  
Chino, California 91708  
(909) 993-1600

Prepared by:

**ESA | Environmental Science Associates**  
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In Association With:

**Tom Dodson & Associates**  
2150 North Arrowhead Avenue  
San Bernardino, California 92405  
(909) 882-3612

**May 2016**

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- Figure 6 Soils Map

# **IEUA POMONA INTERTIE PROJECT**

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## **Initial Study**

### **1. Introduction**

Inland Empire Utilities Agency (IEUA) is proposing to construct the Pomona Intertie Project (project). The project would include improvements to the existing conveyance system infrastructure to support the increased demand for recycled water and groundwater recharge within IEUA's service area. Recycled water from the Pomona Water Reclamation Plant (PWRP) and groundwater from Spadra Well 19 would be conveyed from the City of Pomona to IEUA's existing Montclair recharge basin (Montclair Basin) in the City of Montclair. The proposed project includes the construction of a new pipeline conveyance system, a booster pump station, and a new Advanced Water Treatment Facility (AWTF). The proposed project would improve groundwater supply and provide a new water source to address regional recycled water demands.

### **2. Project Background**

The IEUA was formed in 1950 for the purpose of importing supplemental water supplies from Metropolitan Water District of Southern California (MWD). IEUA, as a member of the MWD, distributes imported water, and provides municipal and industrial wastewater collection and treatment services and other related utility services for the mid-portion of the Upper Santa Ana River watershed in the southwestern-most portion of San Bernardino County, California. In its wastewater management role, the IEUA serves the cities of Chino, Chino Hills, Fontana, Montclair, Ontario and Upland, and the Cucamonga Valley Water District (which generally encompasses the City of Rancho Cucamonga as well as some unincorporated areas of San Bernardino County). Approximately 800,000 people are currently estimated to reside in the IEUA service area, which encompasses approximately 242 square miles.

Monte Vista Water District (MVWD), a county water district formed in 1927, provides retail and wholesale water supply services to a population of over 130,000 within a 30-square mile area, including the communities of Montclair, Chino Hills, portions of Chino and the unincorporated area lying between the cities of Pomona, Chino Hills, Chino and Ontario. MVWD's water sources are obtained in the following distribution: 65% Chino Groundwater Basin, 30% Imported Water from Northern California, 5% Entitlement from San Antonio Water Company, and less than 1% from reclaimed wastewater. The proposed project is a collaborative effort between the IEUA, City of Pomona, and MVWD. IEUA has agreed to serve as the CEQA lead agency for this project as the proposed regional pipeline would be conveyed to IEUA's groundwater recharge basin, Montclair Basin, to replenish the aquifer.



## **2.1 Recycled Water Definitions**

The State Water Resources Control Board (SWRCB) is responsible for regulating the use of recycled water in California. Title 22 of the California Code of Regulations (CCR) includes Water Recycling Criteria (CCR Title 22, Division 4, Chapter 3) that regulate the use of recycled water through health-based water quality standards and treatment reliability criteria for recycled water. Title 22 identifies the allowable end uses for recycled water and the associated minimum treatment requirements for each end use (CCR Title 22, Division 4, Chapter 3, Article 3, Uses of Recycled Water).

Title 22 sets bacteriological water quality standards based on the expected degree of public contact with recycled water. Title 22 establishes four categories of recycled water: disinfected tertiary, disinfected secondary-2.2, disinfected secondary-23, and undisinfected secondary recycled water. Disinfected tertiary recycled water is defined as a filtered and subsequently disinfected wastewater (CCR Title 2, Division 4, Chapter 3, Section 60301.230).

The proposed project would distribute disinfected tertiary recycled water for beneficial end uses that include groundwater replenishment and landscape irrigation. Title 22 allows for disinfected tertiary recycled water to be used for irrigation, including but not limited to parks and playgrounds, school yards, and residential landscaping (CCR Title 22, Division 4, Chapter 3, Article 3, Section 60304). In addition, Title 22 requires recycled water applied to surface recharge basins for purposes of groundwater replenishment also to meet the treatment requirements for disinfected tertiary recycled water (CCR Title 22, Division 4, Chapter 3, Article 5.1, Section 60320.108).

## **3. Project Location**

The proposed regional pipeline would begin in the City of Pomona, traverses east to the City of Montclair, and would discharge into the Montclair Basin (**Figure 1**). The project is comprised of a recycled water distribution pipeline, booster pump station, and AWTF (**Figure 2**). The proposed conveyance pipeline would be constructed within existing roadway public rights-of-way (ROWs) where feasible. The proposed regional pipeline will be located along the following street segments: Erie Street between Mt Vernon Ave and Orange Grove Ave in Pomona where the proposed pipeline meets the proposed booster pump station and continues on Orange Grove Ave between Erie Street and Garey Avenue in Pomona; McKinley Avenue between Garey Avenue and Towne Avenue in Pomona, Towne Avenue between McKinley Avenue and Lincoln Avenue in Pomona; Lincoln Avenue which becomes Orchard Street between Towne Avenue and Ramona Avenue in both Montclair and Pomona; and Ramona Avenue between Orchard Street and Palo Verde Street in Montclair where it meets the Proposed Advanced Water Treatment Site at the corner of Palo Verde Street and Ramona Avenue. From the Proposed Advanced Water Treatment Site the proposed regional pipeline travels to the Montclair Groundwater Recharge Basin from Palo Verde Street at Ramona Avenue in Montclair to Helena Avenue where the proposed regional pipeline travels under the I-10 freeway to end at the Montclair Groundwater Recharge Basin. There are two proposed locations for the pump station, Alternative 1 (**Figure 3A**) would be located within an empty, disturbed lot on the

westside of Erie Street between West Holt Avenue and West Orange Grove Avenue (APN 8355017006) and Alternative 2 (Figure 3B) would be located within an empty, disturbed lot on the southwest corner of North Orange Grove Avenue and East McKinley Avenue (APN 8339020028). The proposed AWTF would be constructed within the existing MVWD's Plant 28, located at the intersection of Palo Verde Street and Ramona Avenue in the City of Montclair as indicated above.

## **4. Project Objectives**

The objectives of the proposed project are to:

- Recharge IEUA's depleting groundwater basins
- Provide a direct use recycled water source for the region

## **5. Project Description**

The proposed project includes the construction of a recycled water pipeline, booster pump station, and AWTF. Figure 2 identifies the proposed locations of each of the project components. The purpose of the project is to improve the groundwater replenishment system within IEUA's service area. The project would serve to consolidate wastewater treatment service in the area by maximizing the recovery of water supply from brine sources within the City of Pomona, IEUA, and Monte Vista Water District (MVWD) service areas. A detailed description of the project components can be found below.

### **5.1 Recycled Water Distribution Line**

The proposed project would require installation of approximately 33,000 lineal feet (LF) of 12- to 16-inch pipeline from the City of Pomona to the City of Montclair. The recycled water from the PWRP and groundwater from Spadra Well 19 would be transported to the Montclair Basin. The distribution pipeline would begin within the City of Pomona's service area where it would connect to the City of Pomona's existing recycled water pipeline at the intersection of Mt Vernon Avenue and Erie Street. The pipeline would traverse north along Erie Street, continuing east on Orange Grove Avenue, and traversing east on East McKinley Avenue. From McKinley Avenue, the pipeline would travel south on North Town Avenue, east on Lincoln Avenue, and enter the City of Montclair jurisdiction once the street becomes Orchard Avenue.

The proposed pipeline would connect to IEUA's existing recycled water pipeline at the intersection of Ramona Avenue and Orchard Street in the City of Montclair. The final segment of the distribution pipeline would travel north through the proposed AWTF and connect to an existing outfall discharging into the Montclair Basin.

The new pipeline would discharge up to 3,500 gallons per minute (gpm) of recycled water into the Montclair Basin. Some of this supply would be used to meet local landscape irrigation demands and for industrial equipment usage. The pipeline would be constructed mostly within existing ROWs in a highly industrial area.

## **5.2 Booster Pump Station**

The proposed project includes two alternative locations for the proposed booster pump station: Alternative 1 and Alternative 2 (see Figure 2). The booster pump station would transmit water from the City of Pomona to the proposed AWTF within IEUA's service area in the City of Montclair, adjacent to the Montclair Basin. Alternative 1 (Figure 3A) and Alternative 2 (Figure 3B) would be located within empty, disturbed lots. As shown on Figure 2, the distribution pipeline would travel adjacent to both alternative booster pump station locations. The booster pump station would be housed within a block building similar to the surrounding architecture. The booster pump station would operate at 400 horsepower. A transformer would be installed to handle the electric power delivered to the pumps. The recycled water would be conveyed through a 12- to 16-inch diameter distribution pipeline from the booster pump station to the proposed AWTF. Following treatment the treated water would be conveyed to the Montclair Basin for groundwater recharge.

## **5.3 Advanced Water Treatment Facility**

An advanced water treatment facility, or AWTF, with a treatment capacity of 5 million gallons per day (MGD) would be constructed as part of the proposed project. The proposed AWTF would be constructed within the existing MVWD's Plant 28 site. Currently, the center of the Plant 28 parcel is utilized as a 2,000 gpm well site and is not included as part of this project. The rest of the parcel is used as a community garden and contains an existing water tank. The total parcel area is approximately 189,000 square feet. The AWTF would utilize approximately 127,000 square feet of this existing facility. The conceptual layout of the proposed AWTF is shown on Figure 4.

The proposed project would require demolition of an existing water tank. The AWTF would include construction of a Microfiltration (MF) treatment facility, a Reverse Osmosis (RO) treatment facility, an Ultraviolet-Advanced Oxidation Process (UV-AOP) treatment, a control room, electrical room, chemical storage, truck off-loading pad, and pipeline corridor/access road. (See Figure 4). The MF/RO membrane treatment process followed by UV-AOP provides tertiary-treated recycled water for groundwater recharge. This process provides the level of treatment needed to meet the Title 22 regulatory requirements for groundwater recharge through spreading and direct injection. Each facility to be constructed as part of the AWTF is further described below.

Electricity would also be required for the treatment processes of the AWTF. Critical process components such as pumps and disinfection would be equipped with standby power.

### ***Microfiltration (MF) Facility***

MF membranes are an efficient technology for particle removal and pathogen control. These technologies yield finished water turbidities consistently below 0.1 NTU, independent of feed water quality. Membrane filtration is a pressure-driven process that provides a near absolute barrier to suspended solids and microorganisms with pore sizes ranging from 0.1 to 0.5 microns. The MF treatment facility would include:

- 200 HP feed pump,
- Microfiltration membranes, and
- Ancillary equipment (100 HP)

### ***Reverse Osmosis (RO) Facility***

High-pressure membrane processes, such as RO, are typically used for the removal of dissolved constituents including both inorganic and organic compounds. RO is a process in which the mass-transfer of ions through membranes is diffusion controlled. The feed water is pressurized, forcing water through the membranes concentrating the dissolved solids that cannot travel through the membrane. Consequently, these processes can remove salts, hardness, synthetic organic compounds, disinfection-by-product precursors, etc.

The RO treatment facility would include:

- RO break tank and 80 HP pump station
- 3 RO trains consisting of a 150 HP feed pump and reverse osmosis membranes
- An RO flush tank with a 15 HP pump station
- An RO clean-in-place system (300 HP).

Ancillary facilities are used intermittently during operation.

### ***Ultraviolet Advanced Oxidation Process (UV-AOP) Facility***

UV disinfection is a physical process that uses no toxic chemicals and produces no known toxic residuals or byproducts. The disinfection mechanism of UV light involves damage or destruction of an organism's genetic material due to the transference of electromagnetic energy (i.e., wavelength of 254 nanometers [nm]) from a UV lamp to the genetic material. The lethal effects of this energy result primarily from the organism's inability to replicate. When coupling this system with a small dose of hydrogen peroxide, an advanced oxidation process (AOP) results, in which hydroxyl radicals are produced which can mineralize many organic microconstituents. The UV-AOP facility would consist of

- 140 kW UV reactor
- Hydrogen peroxide feed system.

## **5.4 Project Construction**

### ***Recycled Water Distribution Line***

Construction of the proposed recycled water pipeline would involve trenching using a conventional cut and cover technique, and jacking and boring where necessary. No dewatering would be required. The trenching technique would include saw cutting of the pavement where applicable, trench excavation, pipe installation, backfill operations, and re-surfacing to the original condition. The trench would be approximately 6 feet deep and 5 feet wide. The pipeline would be installed a minimum of 4 feet below ground surface (bgs). The construction corridor would be approximately 20 feet wide to allow for traffic control, staging areas and vehicle access. Construction staging

areas would be identified by the contractor for pipe lay-down, soil stockpiling, and equipment storage. On average, 200 linear feet of pipeline may be installed per day.

Trenches would be temporarily closed at the end of each work day, by covering with steel trench plates and installing barricades to restrict access to staging areas. The construction equipment needed for pipeline installation would include: backhoe, excavator, bracing, welding equipment, boom lift truck, steam roller, plate compactor. Approximately seven workers per day would be required for construction and installation of the distribution pipeline. Minimal off-site disposal would include construction related debris and spoils.

The installation of the proposed pipeline would require approximately 35 percent of its length to be installed via a jack and bore method. Jack and bore construction methods would be used at all bridge crossings. This tunneling method employs a horizontal boring machine or an auger that is advanced in a tunnel bore to remove material ahead of the pipe. Excavated soils would be retained for backfill. No utility service disruptions are anticipated during construction of the proposed project.

Traffic control would be necessary during pipeline installation within streets, but complete road closures are not anticipated. The Traffic Control Plan for the project would conform to traffic control standards established by the California Department of Transportation (Caltrans), the City of Pomona, and the City of Montclair. A total of up to two or three workers would be required for traffic control during pipeline installation.

### ***Booster Pump Station***

The proposed booster pump station would be housed in a building that may include a pump room, electric control room, odor control facilities, chemical tanks, and storage room. Construction of the booster pump station would involve installation of piping and electrical equipment, excavation and structural foundation installation, pump house construction, pump and motor installation, and final site completion.

The construction equipment needed for booster pump station installation would generally include: auger truck, backhoe, boom lift truck, excavator, plate compactor, and scaffolding. Excavated soils would be reused onsite to the extent feasible and otherwise disposed offsite. Concrete would be required for construction of pump station foundation and pads.

### ***Advanced Water Treatment Facility***

The construction of the 5 MGD advanced water treatment facility would consist of site clearing, demolition, construction of facilities, installation of equipment, and site completion. Construction equipment would include the following: backhoes, loaders, dump trucks, crew trucks, concrete trucks, cranes, personal vehicles, compactor, delivery trucks, and a water truck.

It is estimated that approximately 920 cubic yards (CY) of soil and demolition material would need to be hauled off site. Assuming 20 CY per truck load on average, approximately 46 dump truck trips would be needed to remove the excavated and demolition material. Traffic entering

and leaving the site would include workers' daily arrival and departure, equipment deliveries, hauling of excavation spoil, and other construction related traffic.

In addition to minor soil removal, other materials and equipment would be delivered to the site including piping, building materials, concrete forms, roofing materials, HVAC equipment, pumps, diffusers, screens, belt presses, and screw presses.

## **5.5 Construction Staging Plan**

Pipeline construction would occur mostly within public ROWs of City and County streets. Construction parking would vary with progress along the linear pipeline corridor and near the proposed booster pump station and AWTF sites. Traffic control devices would be incorporated into the design plans to ensure smooth traffic flow during construction. A detailed staging plan would be prepared once the project design begins. Equipment and vehicle staging would be accommodated at each construction site.

## **5.6 Construction Schedule**

The proposed project would take approximately 18 months to construct with the distribution pipeline taking approximately 10 months, the booster pump station taking approximately 6 months, and the AWTF taking approximately 12 months. The tentative schedule for the proposed project would be June 2017 to December 2018. Construction would occur Monday through Friday, primarily during the hours of 7:00 a.m. and 5:00 p.m., or otherwise in accordance with local noise ordinances.

## **5.7 Operation and Maintenance Activities**

Once constructed the proposed recycled water pipeline, the booster pump station, and the AWTF would be operated by IEUA as part of their larger water treatment system. The pipeline would be contained entirely underground and would not require additional staff for operation. In addition, no new staff would be required for the operation of the booster pump station.

After construction of the AWTF is completed and the facility is commissioned and operating, there would be operational traffic associated with worker commute, chemical deliveries, screenings removal, and biosolids removal. No full-time employees would be needed at the proposed new AWTF, employees from the IEUA service system would serve to maintain the facility periodically, as needed. While the proposed treatment processes are not chemical intensive, regular deliveries of various chemicals would be required. It is estimated that there would be an average of 36 chemical truck deliveries and 12 other operational deliveries annually.

End uses for recycled water would include groundwater replenishment and landscape irrigation.

## **6. Required Permits and Approvals**

Numerous approvals and/or permits would be required to implement the proposed project. The approved environmental documentation for the proposed project would be used to help facilitate

compliance with federal and state laws, as well as granting permits by various state and local agencies having jurisdiction over one or more aspects of the project. These approvals and permits may include but are not limited to the following:

- **City of Pomona:**
  - Roadway Encroachment Permit / Easement
  - Traffic Control Plan
  - Building Permit
  - Conditional Use Permit
  - Stormwater Pollution Prevention Plan
- **City of Montclair:**
  - Roadway Encroachment Permit/Easement
  - Traffic Control Plan
  - Building Permit
  - Stormwater Pollution Prevention Plan
- U.S. Fish and Wildlife Service: Federal Endangered Species Act Compliance (CEQA Plus)
- State Water Resources Control Board (SWRCB)
- California Department of Fish & Wildlife (Region 3): State Endangered Species Act Compliance (CEQA Plus)
- State Historic Preservation Office: Section 106 National Historic Preservation Act Compliance (CEQA Plus)

## **7. Purpose of this Document**

IEUA has prepared this IS/MND to provide the public and responsible agencies with information about the potential environmental impacts associated with implementation of the Pomona Intertie Project. This IS/MND includes project-level analysis of the proposed recycled water pipeline, booster pump station and AWTF.

This IS/MND was prepared in compliance with Sections 15070 to 15075 of the California Environmental Quality Act (CEQA) Guidelines of 1970 (as amended) and California Code of Regulations, Title 14, Division, Chapter 3. In accordance with Section 15070, an MND shall be prepared if the Initial Study identifies potentially significant effects, but revisions in the project plans would avoid or mitigate the effects to a point where clearly no significant effects would occur. As the CEQA lead agency, IEUA has determined that an IS/MND is the appropriate CEQA environmental determination for the proposed project.

## 7.1 Impact Terminology

The environmental analysis for each resource defines the criteria used to judge whether an impact is significant based on the CEQA Initial Study Checklist and regulatory agency standards. Impacts that exceed identified threshold levels are considered significant. In describing the significance of impacts, the following categories of significance are used and are based on the best professional judgment of the preparers of the IS/MND:

**No Impact:** There would be no impact to the specific resource or there would be a positive impact on the environment, such as reducing an existing environmental problem.

**Less than Significant:** An impact that may be adverse, but does not exceed the threshold levels and does not require mitigation measures

**Less than Significant with Mitigation:** An impact that is potentially significant, but can be reduced to below the threshold level (to Less than Significant) given reasonable and available mitigation measures.

**Potentially Significant:** An impact that would cause substantial, or potentially substantial, unavoidable adverse impacts above the threshold level. Such an impact requires further evaluation and would trigger the preparation of an Environmental Impact Report (EIR) for the project.



## 8. Environmental Checklist

1. **Project Title:** IEUA Pomona Intertie Project IS/MND
2. **Lead Agency Name and Address:** Inland Empire Utilities Agency  
607 Kimball Ave.  
Chino, CA 91708
3. **Contact Person and Phone Number:** Sylvie Lee  
(909) 993-1600
4. **Project Location:** Pomona, CA  
Montclair, CA  
(See Figures 1 – 2)
5. **Project Sponsor's Name and Address:** N/A
6. **General Plan Designation(s):** Urban Neighborhood  
Activity Center  
Residential Neighborhood  
Low Residential  
Public/Quasi Public  
Conservation Basins
7. **Zoning Designation(s):** Light Industrial (M-1)  
Corridors Specific Plan (CSP)  
Single Family (R-1-6000)  
Single Family (R-1-7200)  
Single Family Residential (R1)
8. **Description of Project:**  
See Section 1 through Section 6.
9. **Surrounding Land Uses and Setting.**  
Varied urban development, including residential neighborhood and commercial development.
10. **Other public agencies whose approval is required** (e.g., permits, financing approval, or participation agreement. Indicate whether another agency is a responsible or trustee agency.)  
See Section 6.

## 8.1 Environmental Factors Potentially Affected

The proposed project could potentially affect the environmental factor(s) checked below. The following pages present a more detailed checklist and discussion of each environmental factor.

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> Aesthetics                                | <input type="checkbox"/> Agriculture and Forestry Resources         | <input checked="" type="checkbox"/> Air Quality                        |
| <input checked="" type="checkbox"/> Biological Resources           | <input checked="" type="checkbox"/> Cultural Resources              | <input checked="" type="checkbox"/> Geology, Soils and Seismicity      |
| <input type="checkbox"/> Greenhouse Gas Emissions                  | <input checked="" type="checkbox"/> Hazards and Hazardous Materials | <input checked="" type="checkbox"/> Hydrology and Water Quality        |
| <input checked="" type="checkbox"/> Land Use and Land Use Planning | <input type="checkbox"/> Mineral Resources                          | <input checked="" type="checkbox"/> Noise                              |
| <input type="checkbox"/> Population and Housing                    | <input type="checkbox"/> Public Services                            | <input type="checkbox"/> Recreation                                    |
| <input checked="" type="checkbox"/> Transportation and Traffic     | <input type="checkbox"/> Utilities and Service Systems              | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

## 8.2 Determination (To be completed by Lead Agency)

On the basis of this initial study:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.

  
 \_\_\_\_\_  
 Signature

Sylvie Lee, Mgr. of Planning/Env. Compliance  
 Printed Name

5.11.2016  
 \_\_\_\_\_  
 Date

IEUA  
 \_\_\_\_\_  
 For

## 8.3 Aesthetics

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>1. AESTHETICS — Would the project:</b>				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Discussion

- a) **Less than Significant.** Construction of the proposed project would result in short-term impacts to aesthetics due to the presence of construction materials and equipment in the visual landscape. The components of the proposed project are not located within a designated scenic vista (City of Pomona 2014). The nearest scenic vista is a ridgeline within Angeles National Forest located approximately 11 miles north of the proposed project. Due to the distance and the temporary nature of construction, construction of the proposed project would not cause any significant adverse impacts to scenic vistas. Once constructed, the majority of the proposed project would be located underground and would not be visible. The booster pump station and the AWTF would be designed to match the surrounding industrial architecture. The booster pump station would be consistent in height with the surrounding structures, and therefore would not be a dominant physical feature in the area. The AWTF would be located on an existing industrial MVWD facility site that already contains two reservoir tanks and ancillary structures. As a result, the addition of the AWTF structure would not create new adverse effects to any scenic vista. Therefore, the proposed project would have a less than significant impact on a designated scenic vista.
- b) **No Impact.** The proposed project is located in an urbanized and residential area that does not contain any important scenic resource values. The project site is not located within a state scenic highway designated by the Department of Transportation (Caltrans) (Caltrans, 2015). The nearest state scenic highway is Highway 2, located approximately 23 miles northwest of the proposed project. Therefore, the project would not substantially damage scenic resources such as trees, rock outcroppings, or historic buildings within a state scenic highway or at the site. No impact would occur.
- c) **Less than Significant.** Construction activities would require the use of heavy equipment and storage of materials on-site. During construction, excavated areas, stockpiled soils, and other materials at the construction site and staging areas would constitute negative aesthetic elements in the visual landscape. However, these effects would be temporary

as they would occur during project construction and would not significantly impact the long-term visual character of the area. Once constructed, the pipeline would be below ground and would not impact the surrounding visual character of the environment. The booster pump station and AWTF would be consistent with the height and architecture design of surrounding buildings. In addition, the AWTF would be located within an existing industrial MVWD facility site, and would be consistent with the existing conditions at this site. The on-site storage materials associated with the AWTF would be housed appropriately and would not affect the visual landscape. Therefore, implementation of the proposed project would have a less than significant impact to the existing visual character within the project area of impact.

- d) **Less than Significant.** The proposed project would not require nighttime construction. Operation of the proposed project would require new lighting for the booster pump station and AWTF for security purposes. Both facilities would be located in urban areas that currently have night lighting either on-site or adjacent to the sites. In addition, the new lighting is required to be consistent with the lighting policies of the Cities of Monte Vista and Pomona zoning code standards by directing all lighting downwards. Therefore, impacts regarding lighting and glare would be less than significant.

Further, the booster pump station and AWTF would not include any large expanses of reflective materials, such as glass commonly used for office buildings. Therefore, impacts regarding glare would be less than significant.

## References

California Department of Transportation (Caltrans), California Scenic Highway Mapping System, [http://www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways/index.htm](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm), accessed December 2015.

City of Pomona, 2014 General Plan Update, Adopted March 2014.

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## 8.4 Agricultural and Forest Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>2. AGRICULTURAL AND FOREST RESOURCES —</b>				
<p>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.</p> <p><b>Would the project:</b></p>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

- a,b) **No Impact.** According to the California Department of Conservation (CDC) Farmland Mapping and Monitoring Program, the project area is not located on land that is designated as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland (CDC, 2015). The proposed project is not located on land under a Williamson Act contract (CDC, 2016). In addition, the proposed project would not be located on land zoned for agricultural uses by the Cities of Pomona and Montclair. Therefore, implementation of the proposed project would not impact agricultural land use designations and would not convert farmland to non-agriculture uses. No impact would occur.
- c,d) **No Impact.** The Land Use Elements of the City of Pomona General Plan and the City of Montclair General Plan do not include zoning categories related to forest land or timberland. Therefore, the proposed project would not impact land zoned as forest land, timberland, or timberland zoned for timberland production, and no re-zoning or conversion of such land would be required. No impact would occur.

- e) **No Impact.** As discussed above in Section 9.2 (a) and (c), the proposed project site is not located on land designated as Prime Farmland, Unique Farmland, Farmland of Statewide Importance, timberland, or forest land. Therefore, implementation of the proposed project would not convert farmland or forest land, and no impact would occur.

## References

California Department of Conservation (CDC), Farmland Mapping and Monitoring Program (FMMP), Los Angeles County Important Farmland 2012, Available online: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/> , accessed December 2015.

California Department of Conservation (CDC), FMMP, San Bernardino County Important Farmland 2012. Available online: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/>. accessed December 2015.

California Department of Conservation (CDC), Los Angeles County Williamson Act 2012-2013, available online: <ftp://ftp.consrv.ca.gov/pub/dlrp/wa/> , accessed February 2016.

California Department of Conservation (CDC), San Bernardino County Williamson Act 2014-2015, available online: <ftp://ftp.consrv.ca.gov/pub/dlrp/wa/>. Accessed February 2016.

City of Montclair. 2013. General Plan Land Use Map.

City of Pomona. 2014. General Plan Update.

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## 8.5 Air Quality

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>3. AIR QUALITY —</b>				
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.				
<b>Would the project:</b>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Discussion

- a) **Less than Significant.** A significant air quality impact may occur if a project is not consistent with the applicable Air Quality Management Plan (AQMP) or obstructs the implementation of the policies or attainment of the goals of that plan. The proposed project is located within the City of Pomona (City) in Los Angeles County, California as well as the City of Montclair (City) in San Bernardino County, California. Both the City of Pomona and the City of Montclair are located in the South Coast Air Basin (Basin), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is the agency principally responsible for air pollution control in the Basin. SCAQMD works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and cooperates actively with state and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures through educational programs or fines, when necessary. SCAQMD and SCAG are responsible for preparing the AQMP, which addresses federal and state Clean Air Act (CAA) requirements. Pursuant to these requirements, the SCAQMD is required to reduce emissions of criteria pollutants for which the Basin is in non-attainment. The AQMP details goals, policies, and programs for improving air quality in the Basin.

Since the forecasted growth in SCAQMD's AQMP for the Basin relies on SCAG's regional growth forecasts, and because SCAG's growth forecasts are based upon, among other things, land uses specified in city general plans, a project that is consistent

with the land use designated in a city's general plan would also be consistent with the AQMP growth projections.

The purpose of the project is to improve the groundwater replenishment system within Inland Empire Utilities Agency's (IEUA) service area. Implementation of the proposed project would not result in any additional population, housing, or employment growth in the project area. Consequently, as no growth-inducing development or land use would occur under the project, implementation of the project would not conflict with or obstruct the implementation of SCAQMD's AQMP. Therefore, the proposed project would result in a less than significant impact.

- b) **Less than Significant with Mitigation.** A project may have a significant impact where project-related emissions would exceed federal, state, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. The proposed project includes installation of recycled water distribution lines that span from the City of Pomona to the City of Montclair, a new pump station, and a new Advanced Water Treatment Facility (AWTF). Potential air quality impacts associated with the project would mostly occur during the construction phase of the project. After construction is completed, the pipeline would be contained entirely underground and would not require additional staff for operation. In addition, no new staff would be required for the operation of the booster pump station. No full-time employees would be needed at the proposed new AWTF. Instead, employees from the IEUA service system would maintain the facility. As such, the mobile emissions generated during project operations would be attributed to the chemical delivery trucks and other operational deliveries.

Construction would include pipeline installation, and booster pump station and AWTF construction. Construction would begin July 2016 and be completed by January 2018. Construction of the pipeline, pump station and AWTF would generate pollutant emissions from (1) demolition (2) site preparation, (3) excavation and pipe installation; (4) construction workers traveling to and from the construction site; (5) building and associated construction activities, and (6) delivery and hauling of construction supplies and debris to and from the construction site.

The California Emissions Estimator Model (CalEEMod) was used to determine whether construction emissions would exceed SCAQMD's significance thresholds and, if so, to identify mitigation to reduce emissions (output data is included in **Appendix A**). Modeling was based on project-specific data, when available. Where project-specific information was not available, default CalEEMod settings were used to estimate criteria air pollutant emissions. For the purpose of this analysis, the construction emissions occurring on a peak (worst-case) day over the entire project construction period were estimated and evaluated against the applicable SCAQMD significance thresholds.



**Table 8.5-1** shows emissions for the peak construction day. These calculations assume that dust mitigation required by SCAQMD Rule 403 would be implemented during each construction phase.

**TABLE 8.5-1  
PROJECT PEAK DAY CONSTRUCTION EMISSIONS**

	Pounds per Day					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Peak Daily-2016	2.0	19.8	12.9	0.0	1.1	1.0
Peak Daily-2017	5.2	49.5	39.6	0.1	4.3	2.9
Peak Daily-2018	1.3	12.2	10.5	0.0	1.3	0.7
SCAQMD Thresholds	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No

<sup>a</sup> Emissions shown accounts for the implementation of mandatory dust control measures as required by SCAQMD Rule 403—Fugitive Dust.

NOTE: See Appendix A for CalEEMod output.

As shown in Table 8.5-1, the peak daily regional emissions generated during project construction would not exceed the SCAQMD daily significance thresholds for ROG, CO, NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>2.5</sub>, or PM<sub>10</sub>. Since construction emissions would not exceed the SCAQMD thresholds, the regional impacts related to air quality during project construction activities are less than significant.

However, since the South Coast Air Basin (SoCAB) is in non-attainment for ozone and particulate concentrations, the following mitigation measures will be implemented to reduce precursor emissions to the extent reasonably feasible.

***Mitigation Measures***

**AIR-1:** Using best available control measures during soil disturbance. The menu of enhanced dust control measures includes the following:

- Limit the disturbance “footprint” to as small an area as practical.
- Water all active construction areas at least twice daily.
- Cover all off-site haul trucks or maintain at least 2 feet of freeboard.
- Pave or apply water four times daily to all unpaved parking or staging areas.
- Sweep or wash any site access points within 30 minutes of any visible dirt deposition on any public roadway.

- Cover or water twice daily any on-site stockpiles of debris, dirt or other dusty material.
- Suspend all operations on any unpaved surface if winds exceed 25 mph.

**AIR-2:** Limit allowable idling to 5 minutes for trucks and heavy equipment before shutting the equipment down.

**AIR-3:** Utilize Tier 3 rated diesel engines for off-road construction equipment.

As mentioned above, once the construction for the pipeline, pump station and AWTF is complete, operation of the AWTF and delivery trips would be the main contributors to operational emissions. CalEEMod was also used to estimate operational emissions (output data is included in Appendix A). Table 8.5-2 shows those emissions and compares them to SCAQMD’s significance thresholds.

**TABLE 8.5-2  
OPERATIONAL EMISSIONS**

	Pounds per Day					
	ROG	NOx	CO	SOx	PM <sub>10</sub>	PM <sub>2.5</sub>
Operational-2018	3.4	0.7	0.6	0.0	0.1	0.0
SCAQMD Thresholds	55	55	550	150	150	55
Significant Impact?	No	No	No	No	No	No

<sup>a</sup> Emissions shown accounts for the implementation of mandatory dust control measures as required by SCAQMD Rule 403—Fugitive Dust.

NOTE: See Appendix A for CalEEMod output.

As shown in Table 8.5-2, the operational emissions associated with the project would not exceed the SCAQMD thresholds. Therefore, the project’s operational emissions would be considered less than significant.

- c) **Less than Significant.** With respect to air quality, a significant impact may occur if the project would add a considerable cumulative contribution to federal or state non-attainment pollutants. Because the SoCAB is currently classified as a state nonattainment area for ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>, cumulative development consisting of the project along with other reasonably foreseeable future projects in the SoCAB as a whole could violate an air quality standard or contribute to an existing or projected air quality violation. However, based on SCAQMD’s cumulative air quality impact methodology, SCAQMD recommends that if an individual project results in air emissions of criteria pollutants (ROG, CO, NOx, SOx, PM<sub>10</sub>, and PM<sub>2.5</sub>) that exceed the SCAQMD’s recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants for which the project region is in non-attainment under an applicable federal or state ambient air quality standard.

As discussed under Question 3(b) above, the proposed project would not generate either construction or operational emissions that would exceed the SCAQMD's recommended thresholds. Therefore, the proposed project would not generate a cumulatively considerable increase in emissions of the pollutants for which the Basin is in nonattainment, and impacts would be less than significant.

- d) **Less than Significant.** A significant impact may occur if a project were to generate pollutant concentrations that significantly affect sensitive receptors. Sensitive receptors are populations that are more susceptible to the effects of air pollution than the population at large. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, child care centers, and athletic facilities. The nearest and most notable off-site sensitive receptors to the project would be the existing residential uses that are currently located: 1) along the roadways adjacent to the proposed pipeline location, 2) adjacent to the lots of both proposed locations of the booster pump station and 3) adjacent to the south side of the AWTF along Cambridge Street.

#### ***Localized Construction Emissions***

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. The SCAQMD has developed localized significance thresholds (LSTs) that are based on the pounds of emissions per day that can be generated by a project before it would cause or contribute to adverse localized air quality impacts. These localized thresholds are found in the mass rate look-up tables in the SCAQMD's *Final Localized Significance Threshold Methodology* document. The LSTs, apply to projects that on a daily basis disturb areas less than or equal to five acres, and only to a project's on-site emissions for NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>.

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards, and are developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) within the Basin. The project area consists of an approximately 6-mile stretch along the project site in the City of Pomona (SRA 10) and the approximately 4.5 acre site for the AWTF in the City of Montclair (SRA 32). Both proposed locations for the booster pump station in Pomona are less than one acre.

The LSTs developed by SCAQMD are provided for the following distances from the source of emissions: 82 feet, 164 feet, 328 feet, 656 feet, and 1640 feet. Additionally, the LSTs at these distances also vary based on the size of the project site. The SCAQMD has provided LSTs for sites that are 1-acre, 2-acres, and 5-acres. The worst-case daily construction area would be less than five acres for the pipeline, the booster pumps, and the AWTF. Consequently, the 5-acre site LST values were used in this analysis. The nearest off-site sensitive receptors that could potentially be subject construction emissions would be the existing residential uses located adjacent to and across the

street bordering the project site for construction of the pipeline, pump station locations, and the AWTF. Given the proximity of these sensitive uses to the construction areas, the LSTs for a 5-acre site with receptors located 82 feet (25 meters) from the project site are used to address the potential localized air quality impacts associated with the project's construction-related NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions.

**Table 8.5-3** shows the peak daily emissions generated during construction and operation. Peak daily emissions generated during project construction and operation would not exceed the applicable construction LSTs. Therefore, localized air quality impacts from the project on the surrounding off-site sensitive receptors would be less than significant.

**TABLE 8.5-3  
LOCALIZED CONSTRUCTION AND OPERATIONAL POLLUTANT EMISSIONS**

	Pounds per Day			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Construction-2016	19.84	12.86	1.14	0.97
Construction-2017	49.49	39.65	4.27	2.91
Construction-2018	12.19	10.52	1.31	0.73
<b>Peak Day Localized Emissions</b>	<b>49.49</b>	<b>39.65</b>	<b>4.27</b>	<b>2.91</b>
City of Montclair Thresholds	270	2193	16	9
City of Pomona Thresholds	236	1566	12	7
<b>Exceed Thresholds</b>	No	No	No	No
Operational	0.07	0.57	0.05	0.05
City of Montclair Thresholds	270	2193	4	2
City of Pomona Thresholds	236	1566	3	2
<b>Exceed Thresholds</b>	No	No	No	No

See Appendix A for CalEEMod output.

LSTs for a 5-acre site located in SRA 32 and SRA 10.

### ***Toxic Air Contaminants***

A substance is considered toxic if it has the potential to cause adverse health effects in humans. A toxic substance released into the air is considered a toxic air contaminant (TAC). TACs are identified by state and federal agencies based on a review of available scientific evidence. In the State of California, TACs are identified through a two-step process that was established in 1983 under the Toxic Air Contaminant Identification and Control Act. This two-step process of risk identification and risk management was designed to protect residents from the health effects of toxic substances in the air.

Construction of the proposed project would result in short-term diesel exhaust emissions from off-road heavy-duty equipment. Diesel exhaust is considered a TAC. Construction

would result in the generation of diesel exhaust emissions from the use of off-road diesel equipment required for site preparation and excavation, and other construction activities.

The dose to which sensitive receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the maximally exposed individual. Thus, the risks estimated for a maximally exposed individual are higher if a fixed exposure occurs over a longer period. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the proposed project. Although construction of the entire project would occur over approximately 18 months, due to the intermittent nature of construction activities and varying locations of construction activities, the relatively short-term construction period in any one location, the proposed project would not result in significant construction-related health risks. Therefore, diesel particulates from construction activities would not expose sensitive receptors to levels that exceed applicable standards, and impacts would be less than significant.

Additionally, operation of the proposed project, which consists of recycled water distribution pipeline, a booster pump station and the AWTF, would not result in the release substantial quantities of any TAC emissions. No impacts related to TAC emissions would occur during project operations.

- e) **Less than Significant.** A significant impact may occur if a project generates objectionable odors that adversely impact sensitive receptors. According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed project includes extension of a recycled water collection and distribution system within the Cities of Pomona and Montclair. The proposed pipeline extension is not a use identified by the SCAQMD as being associated with odors. The project also includes a new Advanced Water Treatment Facility. The AWTF would treat recycled water and groundwater that is produced in the Cities of Pomona and Montclair and IEUA's service area. The treated water would be conveyed to IEUA's groundwater recharge basin to replenish the aquifer. There are no associated odor impacts with this type of treatment facility (water treatment) and this impact is less than significant.

During construction of the proposed project, equipment exhaust may produce discernible odors typical of diesel equipment operation. Such odors could be a temporary source of nuisance to adjacent uses, but would not affect a substantial number of people. As odors associated with project construction would be temporary and intermittent, the odors

would not be considered a significant environmental impact. Therefore, impacts associated with objectionable odors would be less than significant.

## **References**

South Coast Air Quality Management District (SCAQMD). 2013. 2012 Air Quality Management Plan. March 11, 2016.

SCAQMD. 2011. SCAQMD Air Quality Significance Thresholds. Available: <<http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>>. March 11, 2016.

SCAQMD. 2003. Final Localized Significance Threshold Methodology, Appendix C – Mass Rate LST Look-up Tables. June. Revised October 21, 2009.

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## 8.6 Biological Resources

<u>Issues (and Supporting Information Sources):</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation incorporation</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
<b>4. BIOLOGICAL RESOURCES — Would the project:</b>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Setting

A biological field reconnaissance was conducted by an Environmental Science Associates (ESA) biologist on February 10, 2016. In addition, the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDDB) layer was queried in ArcGIS 10.2.2 for the USGS 7.5-minute topographic quadrangle maps, San Dimas and Ontario. The CNDDDB database search yielded 16 special-status plant species and 24 wildlife species. Of these, 3 are formally listed species, the federally and state endangered least Bell's vireo (*Vireo bellii pusillus*), the federally and state endangered slender-horned spinyflower (*Dodecahema leptoceras*), and the federally threatened and state endangered western yellow-billed cuckoo. In addition, 8 species occurrences intersected the project alignment: Salt Spring checkerbloom (*Sidalcea neomexicana*) (CNPS-CDFW Rare Plant Rank (CRPR) 2B.2), California diplectronan caddisfly (*Diplectrona californica*), Crotch bumble bee (*Bombus crotchii*), big free-tailed bat (*Nyctinomops macrotis*), San Bernardino aster (*Symphotrichum defoliatum*) (CRPR 1B.2), western yellow bat (*Lasiurus xanthinus*), mesa horkelia (*Horkelia cuneata var. puberula*) (CRPR 1B.1), and Robinson's pepper-grass (*Lepidium virginicum var. robinsonii*) (CRPR 4.3). None are federally or state listed species.

The proposed project area is located within the City of Pomona in Los Angeles County and the City of Montclair in San Bernardino County. The majority of land use in the City of Pomona is developed residential, commercial, and industrial (City of Pomona, 2014). The City of Montclair is located in the Valley Region of San Bernardino County, which encompasses approximately 480 acres. This region is almost entirely urbanized, with few natural open space areas (San Bernardino County, 2007). The locations of the project components within the City of Pomona consist of developed or disturbed habitat types. The locations of the project components within the City of Montclair consist of developed or disturbed habitat types.

ESA biologists conducted a site visit of the proposed project areas on February 10, 2016 at 11:15 a.m. The weather condition was sunny with winds of 2-5 miles per hour and 83 degrees Fahrenheit. It was observed that the pipeline route would be constructed entirely within developed areas, roadways or existing facilities. The areas adjacent to the pipeline route include landscaping, weedy ruderal areas, development including paved area, residential areas, schools, and one flood control channel.

There is one concrete flood control facility that will be crossed within the pipeline route, which runs northeast to southwest. The Ramona Street section crosses a square concrete flood control channel with no vegetation.

The vegetation found within the landscaped areas are typical for the area including Japanese privet, Mexican fan palms, Queen Anne palms, Indian hawthorn, crape myrtle, Coast live oak, liquid amber, agapanthus, and fescue grass turf.

The majority of the vegetation of each of the surveyed parcels consist of ruderal vegetation and bare soil and gravel. The vegetation within the ruderal areas includes riggut brome (*Bromus diandrus*), red brome (*Bromus rubens*), wild oat (*avena fatua*), redstem filaree (*Erodium cicutarium*), London rocket (*Sisymbrium irio*), and tobacco tree (*Nicotiana glauca*).

There are four large coast live oak trees within the proposed AWTF, in the southwest portion of the parcel. The remainder of the parcel consists of developed areas, bare soil, and a community vegetable garden.

No suitable habitat for special-status wildlife or plant species exists within the proposed project impact areas.

## Discussion

- a) **Less than Significant.** The proposed project falls within USGS 7.5-minute topographic quadrangles, San Dimas and Ontario, which contain 40 CNDDDB species occurrences. 8 species occurrence polygons intersected the proposed project alignment. Three plant species, Salt Spring checkerbloom (*Sidalcea neomexicana*) (CNPS-CDFW Rare Plant Rank (CRPR) 2B.2), San Bernardino aster (*Symphyotrichum defoliatum*) (CRPR 1B.2), and mesa horkelia (*Horkelia cuneata* var. *puberula*) (CRPR 1B.1) had CRPRs of 3 or greater. No plant or animal species intersecting the proposed project alignment are federally or state listed. The proposed project impact areas are contained entirely within



existing roadway ROWs and existing facilities. The proposed project impact areas do not support habitat suitable for special-status plant or wildlife species. Impacts are considered to be less than significant.

- b) **No Impact.** The proposed project would be constructed entirely within previously disturbed and developed areas (mainly roadway ROWs). In addition, no riparian areas or sensitive natural communities exist within or adjacent to the proposed project areas. No impact would occur.
- c) **Less than Significant.** The proposed project would be constructed entirely within previously disturbed and developed areas. The pipeline would be constructed within the existing ROW. The pipeline would cross over San Antonio Creek, a concrete-channelized waterway along Orchard Street, Ramona Avenue, and at Palo Verde Avenue. No impacts to the concrete channel would occur. The pipeline would terminate at the Montclair Basins. A small outfall structure would be constructed at the terminus of the pipeline in the side of the basin. During construction, IEUA and the contractor would utilize best management practices (BMPs) to ensure that construction-related debris or potential fuel spills from construction equipment would be contained entirely on-site and would not impact the adjacent creek or channels. No federally protected wetlands as defined by Section 404 of the Clean Water Act would be affected by implementation of the proposed project. With implementation of mandatory BMPs, impacts are considered to be less than significant.
- d) **No Impact.** The proposed project would consist of a recycled water pipeline, booster pump station and water treatment facility entirely within exiting industrial facilities or roadway ROWs. The proposed pipeline would cross the San Antonio Creek, which could be used by wildlife in this highly industrial and commercial area. However, no impacts to the creek channel are proposed and underpasses below existing roads, if any exist, would not be impacted by construction activities. No established native resident or wildlife corridors exist within the proposed project area. No impact would occur.
- e) **Less than Significant with Mitigation.** The proposed project pipeline would be constructed within roadway ROWs and would not impact any vegetation beyond potentially landscaped areas adjacent to the roadways. No trees would be impacted due to construction of the pipeline or the booster pump station. No impact would occur.

The AWTF facility would be constructed on a property that currently has four oak trees. These trees would be impacted by construction of the proposed facilities and would need to be removed. According to the City of Montclair's Tree Policy (approved by the City Council on January 5, 2004 and codified as Chapter 9.28 of the Montclair Municipal Code), Section VI Oak Tree Preservation Guidelines, oak trees should be preserved and protected in recognition of their historical, aesthetic, and environmental value. The plan states that no oak tree shall be removed without the written approval from the City of Montclair. With implementation of **Mitigation Measure BIO-1**, impacts to oak trees would be considered less than significant.

### **Mitigation Measures**

**BIO-1:** Prior to removal of the four oak trees present within the proposed AWTF, IEUA shall consult with the City of Montclair to determine the appropriate location and number of trees to be planted within the facility according to the regulations outlined in the City of Montclair Tree Policy.

- f) **No Impact.** The proposed project improvements would not occur in areas which fall under the jurisdiction of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impact would occur.

### **References**

California Department of Fish and Wildlife, California Natural Diversity Database (CNDDDB), 2015. Available online: <http://www.dfg.ca.gov/biogeodata/cnddb/mapsanddata.asp>

City of Montclair Municipal Code, Title 9 Public Services and Public Places, Chapter 9.28 Trees.

San Bernardino County, 2007. Conservation Element of San Bernardino's General Plan 2007

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## 8.7 Cultural Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>5. CULTURAL RESOURCES — Would the project:</b>				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) AB 52 consultation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

- a) **Less than Significant with Mitigation.** A Phase I cultural resources study was prepared for the project (Gonzalez and Ehringer, 2016). The study included a records search at the South Central Coastal Information Center (SCCIC), a California Native American Heritage Commission (NAHC) sacred lands file (SLF) search, historic map and aerial photograph review, and a cultural resources survey.

#### **SCCIC Records Search**

The SCCIC records search included a review of all previous cultural resources studies and previously documented archaeological resources within a 1-mile radius of the project area and historic-period built resources within a 1/8-mile radius of the project area. In addition, the California Register of Historical Resources (California Register), the National Register of Historic Places (National Register), and the California State Historic Resources Inventory (HRI) listings were reviewed. A total of 47 cultural resources studies have been previously conducted within a 1-mile radius of the project area. Approximately 15 percent of the records search radius has been included in previous cultural resources surveys. Of the 47 previous studies, one (LA-5726) included portions of the project area. Approximately 5 percent of the project area has been subject to previous cultural resources survey.

The records search indicated that two archaeological resources have been previously documented within the 1-mile radius and 21 historic-period built resources have been previously documented within the 1/8-mile radius (Table 8.7-1). The two archaeological resources are prehistoric sites (CA-LAN-208 and -349). The 21 historic-period built resources include: P-19-186112 – railroad; P-19-187008 – historic district; P-19-188036 – trailer park; P-19-188186 – church; and 17 single-family residences (see Table 8.7-1 for list). None of the archaeological sites are within or adjacent to the project area. One historic-period built resource (P-19-187008 – historic district) is adjacent to and also

overlaps portions of the project area, and two historic-period built resources (P-19-188186 and -190034) are immediately adjacent to (within 50 feet) of the project area.

**TABLE 8.7-1  
PREVIOUSLY RECORDED ARCHAEOLOGICAL RESOURCES WITHIN 1-MILE AND HISTORIC-PERIOD BUILT RESOURCES WITHIN 1/8-MILE OF THE PROJECT AREA**

<b>Primary # (P-19)</b>	<b>Trinomial (CA-LAN-)</b>	<b>Other Designation</b>	<b>Description</b>	<b>Date Recorded /Updated</b>
000208	208	-	Prehistoric archaeological site consisting of a possible cemetery and a fragment of pottery.	1968
000349	349	-	Prehistoric archaeological site consisting of a shell midden and previous known burials.	1968
150401	-	HRI#092977, House for C.P. Stensgaard, 551 East Burdick Drive	Historic-period built resource consisting of a 1929, single story, Spanish Eclectic Style residence, with a Pueblo Influence.	1993
150402	-	HRI#092978, Joe Wilkinson House, 403 East Kenoak Place	Historic-period built resource consisting of a 1908, two-story, Craftsman Style residence.	1993
150404	-	HRI#092982, 493 East Kenoak Place	Historic-period built resource consisting of a 1909, two-story, Craftsman Style residence with some Colonial Revival elements, such as a brick base.	1993
150405	-	J.R. Wilson House, 1382 North Park Avenue	Historic-period built resource consisting of a 1923, single-story, Craftsman Style residence.	1993
150406	-	HRI#092984, 1355 North Park Avenue	Historic-period built resource consisting of a Craftsman style residence	1993
150407	-	B.F. Hendricks House, 1448 North Gordon Street	Historic-period built resource consisting of a 1890s, single-story, American Foursquare Style residence.	1993
186112	-	C-Los Angeles-A-1, Union Pacific Railroad, Southern Pacific Railroad	Historic-period built resource consisting of the Union Pacific Railroad, with the major portion of track and associated spurs, sidings, and stations being constructed between 1869 and 1905.	1999/2002/2009

Primary # (P-19)	Trinomial (CA-LAN-)	Other Designation	Description	Date Recorded /Updated
187008*	-	-	Historic-period built resources consisting of the Lincoln Park Historic District. The district has dates from the late 19 <sup>th</sup> Century and the early 20 <sup>th</sup> Century, with 750 contributing buildings and objects, and 76 noncontributing buildings.	2002
187025	-	DOE#19-99-0319-0000, LA-10-PM 42.4/48.3, 122401, C.P. Stensgard Residence, 565 Burdick Drive	Historic-period built resource consisting of a 1930, single -story, Spanish Style residence.	1999
188038	-	Western Mobile Garden Trailer Park, 1737 West Holt Avenue	Historic-period built resources consisting of Western Mobile Garden Trailer Park. The park contains an Early to mid-20 <sup>th</sup> Century residential and recreational development.	2007 (demolished)
188037	-	1753 West Holt Avenue	Historic-period built resource consisting of a 1954, single -story, Vernacular Style residence.	2007 (demolished)
188186*	-	Pomona Fellowship Church	Historic-period built resource consisting of a 1948/1959-63, single -story, English Gothic Revival Style church building.	2004
188717	-	HRI#132685, 8349-007-047/ Cruces/ 1689 W. Ninth St., Pomona, CA	Historic-period built resource consisting of a 1947, single -story, Minimal Traditional Style residence.	2007
188909	-	HRI#166120, 8357-009-008/Garcia/991 Huntington	Historic-period built resource consisting of a 1923, single -story, Craftsman Bungalow Style residence.	2007
189407	-	Andrew A. Keown Residence, Prop#123680, DOE# 19-99-0321-0000, 07-LA-10, P.M. 42.4-48.3, 122401, 1571 North Orange Grove Ave.	Historic-period built resource consisting of a 1947, two -story, Stucco Box Style residence.	1999
189408	-	Prop#123679, DOE# 19-99-0320-0000, 07-LA-10, P.M. 42.4-48.3, 122401, 1567 North Orange Grove Ave	Historic-period built resource consisting of a 1953, single -story, Bungalow Style residence.	1999

Primary # (P-19)	Trinomial (CA-LAN-)	Other Designation	Description	Date Recorded /Updated
190029	-	HRI#147544, 130 Monroe Street/AIN 8339-021-008	Historic-period built resource consisting of a 1931, single -story, Tudor Style residence.	2011
190031	-	HRI#147545, 138 Monroe Street/AIN 8339-021-007	Historic-period built resource consisting of a 1929, single -story, Tudor and Minimal Traditional Style residence.	2011
190032	-	HRI#147546, 146 Monroe Street/ AIN 8339-021-006	Historic-period built resource consisting of a 1928, single -story, Spanish Eclectic Style residence.	2011
190033	-	HRI#147547, 154 Monroe Street, AIN 8339-021-005	Historic-period built resource consisting of a 1933, single -story, Spanish Eclectic Style residence.	2011
190034*	-	HRI#147591, AIN 8339-019-018, 1524 N Orange Grove Ave	Historic-period built resource consisting of a 1931, single -story, Spanish Eclectic Style residence.	2011

**Resource P-19-187008** consists of the Lincoln Park Historic District originally recorded in 2002. The district dates from the late 19th to early 20th centuries. There are a total of 750 contributing buildings and objects, and 76 noncontributing buildings within the district (Ruecker & Voll 2002). The district overlaps with a portion of the recycled water pipeline alignment located within East McKinley Avenues and is also adjacent portions of the recycled water pipeline alignment located within North Orange Grove Avenue and North Towne Avenue. In addition, the proposed booster pump station, Alternative 2, is located just north of the district near the intersection of East McKinley Avenue and South Orange Avenue. The district is listed in the National Register and was the first historic district created under the City of Pomona's 1995 Historic Preservation Ordinance (pomonaheritage.org 2016; Ruecker & Voll 2002).

**Resource P-19-188186** is the Pomona Fellowship Church originally recorded in 2004. The church was constructed in 1948/1959-63 and is a single -story, English Gothic Revival Style building (Hetzl 2004). The church is located just north of a portion of the recycled water pipeline located within West Orange Grove Avenue between North Hamilton Boulevard and North Lewis Street. The church appears to be eligible for listing in the National Register under Criterion C for its distinctive architectural character as an English Gothic Revival Style church building (Hetzl 2004).

**Resource P-19-190034** a single-story Spanish Eclectic Style residence constructed in 1931 and originally recorded in 2011 (Campbell 2011). The building is just south of a portion of the recycled water pipeline alignment in North Orange Grove Avenue. The resource was recommended not eligible for individual listing in the National Register, but is considered a contributor to the Lincoln Park Historic District (Campbell 2011).

### ***Historic Map and Aerial Photographs***

Historic maps and aerial photographs were examined in order to provide historical information about the project area and to contribute to an assessment of the project area's cultural sensitivity. Available documents include the 1900 U.S. Geological Survey (USGS) Rancho Cucamonga, CA 15-minute topographic map, 1904 USGS Pomona, CA 15-minute topographic map, 1928 USGS Claremont 6-minute topographic map, Sanborn Fire Insurance Maps from 1928 and 1950, a 1938 Thomas Bros. map, and historic aerial photographs from 1938, 1946, 1948, 1953, 1959, 1965, 1966, 1972, and 1980 (David Rumsey, 2016; HistoricAerials.com, 2016; Los Angeles Public Library, 2016). The majority of early historic maps of the area show some structures within or immediately adjacent to the most portions of the project area. In addition, these early maps show that most of the surrounding areas consisted of orchards and agricultural fields. The San Antonio Creek appears channelized on the 1959 aerial. The project area was almost completely developed by the end of the 1960s and beginning of the 1970s.

The 1900 topographic map depicts a handful of buildings or structures adjacent to the recycled water pipeline alignment. The 1904 topographic map depicts the Southern Pacific Railroad just south of the southwestern portion of the recycled water pipeline alignment. By 1928, several more buildings were scattered along the recycled water pipeline alignment, and the Southern Pacific Covina Branch runs along White Avenue and crosses West Orange Grove Avenue. The 1938 Thomas Bros. map depicts the Pacific Electric Railroad running along Garey Avenue and crossing West Orange Grove Avenue.

The 1900 topographic map depicts a building or structure in the location of the proposed AWTF. By 1938, the location of the proposed AWTF was covered with orchards although a couple of small structures appear to be present as well. The orchard and structures remained until sometime between 1953 and 1959 when the orchard and all but one structure were removed and the existing tank constructed.

The proposed booster pump station alternative 1 appears to have been largely vacant over time. One structure located on the westernmost edge of the parcel is visible on aerials from 1948 to 1980 and a couple of very small structures located roughly in the central portion of the parcel that are visible on aerials from 1959 to 1980. The parcel does not appear to have ever been heavily developed and appears to have been used for agricultural activities.

In 1938 and the proposed booster pump station alternative 2 appears largely occupied by residences with a few orchard trees present. By 1959, a commercial building appears

to have been constructed and is present until it is demolished sometime between 2003 and 2005.

### ***NAHC SLF Search***

An SLF search was conducted by the NAHC on February 11, 2016. The results of the SLF search indicate that there are no known Native American cultural resources on file at the NAHC (Totton, 2016).

### ***Native American Outreach***

The California Native American Heritage Commission (NAHC) was contacted on January 22, 2016 to request a search of the Sacred Lands File (SLF) and a list of Native Americans who may have an interest in the project. The NAHC replied on February 11, 2016, indicating that the SLF has no record of any cultural resources within the project APE. The reply also included a list of eight Native American representatives who may be interested in the project. Contact letters were sent via certified mail to all eight of these representatives on March 14, 2016. The letters included information on the project, a map of the project location, results of the background research and archaeological survey completed for the project, and an invitation to share information or concerns regarding cultural resources in or near the project APE. On March 31, 2016, follow-up phone calls were placed to all tribes.

On March 23, 2016, Ms. Katie Croft, Agua Caliente Band of Cahuilla Indians (Agua Caliente) Archaeologist, responded by email stating that the project is not located within the Agua Caliente's traditional use area and that the Agua Caliente defer all project-related cultural resources consultation to other tribes in the area. In a phone call on March 31, 2016, Ms. Patricia Garcia-Plotkin, Director of the Agua Caliente, requested that the original letter be sent to her via email. The letter was sent to Ms. Garcia-Plotkin via email on March 31, 2016. No additional response has been received from Ms. Garcia-Plotkin.

In a phone call on March 31, 2016, Ms. Sandonne Goad, Chairperson of the Gabrielino/Tongva Nation, requested that Mr. Sam Dunlap be contacted instead and a voicemail was left for Mr. Dunlap. No additional response has been received from Ms. Goad or Mr. Dunlap.

In a phone call on March 31, 2016, Mr. Joseph Hamilton, Chairman of the Ramona Band of Cahuilla Mission Indians (Ramona), could not be reached, but Ms. Susan Rekker, Ramona Tribal Administrator, requested that the original letter be resent via email to her and to Mr. John Gomez. The letter was sent to Ms. Rekker, and Mr. Gomez via email on March 31, 2016. No additional response has been received from Ms. Rekker or Mr. Gomez.

In a phone call on March 31, 2016, Shane Helms, Morongo Band of Mission Indians Cultural Resources Department, stated that the tribe does not have any concerns about the project.



In a phone call on March 31, 2016, Mr. Anthony Morales, Chairperson of the Gabrielino/Tongva San Gabriel Band of Mission Indians, stated that he is concerned with the project APE's sensitivity for buried archaeological deposits and the overall natural landscape of the project APE, recommended that a Native American monitor from his tribe be present during project ground-disturbing construction activities, and requested to remain informed of any project updates.

In a phone call on April 1, 2016, Mr. Andrew Salas, Chairperson of the Gabrieleño Band of Mission Indians – Kizh Nation, indicated that he had not reviewed the letter and requested that the original letter be resent via email. The letter was sent to Mr. Salas via email on April 1, 2016. In an email response dated April 3, 2016, Mr. Salas indicated that the project APE is located in the ancestral and traditional territories of the Kizh Gabrieleño and that the village of "Toybipet" was located somewhere in the general area. He also requested that a Native American monitor from his tribe be present for all ground-disturbing activities.

### ***Cultural Resources Survey***

A cultural resources survey of the project area was conducted on January 15, 2016 to identify the presence of surface archaeological materials and historic-period built resources within the project area. Survey methods varied across the project area. Areas with visible ground surface were subject to pedestrian survey with transect intervals spaced no greater than 5 meters (approximately 16.5 feet) apart. A windshield survey was conducted within all developed areas with no visible ground surface. The project area consists of a heavily developed, flat topography with ornamental trees, plants and grasses used in landscaping, with some seasonal grasses and shrubs found in the open areas. Three areas had visible ground surface and were subject to systematic survey: 1) booster pump station Alternative 1 (just northwest of the W. Holt Ave. and N. Erie St.; 2) booster pump station alternative 2 (1581 N. Orange Grove Ave.); and 3) the AWTF (southwest corner of Ramona Ave. and Palo Verde St.). The surface visibility at Alternative 1 was very poor (0-10 percent) due to dense, overgrown grasses. The surface visibility for Alternative 2 was also poor (0-10 percent) due to modern dumping of refuse and construction debris, and appears to have been recently graded and disturbed. The AWTF also had very poor surface visibility (0-5 percent) due to a layer of gravel that covers the majority of the surface. No cultural resources were identified during the survey of these three areas. The recycled water pipeline alignment consists of paved streets and was subject to a windshield survey. Five cultural resources, four historic-period bridges and a portion of the San Antonio Creek Channel, were identified during the survey and documented on California Department of Parks and Recreation (DPR) 523 Primary Forms.

**TABLE 8.7-2  
CULTURAL RESOURCES SURVEY RESULTS**

<b>Caltrans Bridge Number</b>	<b>Resource Name</b>	<b>Year Built</b>
54C0223	Orchard Street Bridge over San Antonio Creek Channel	1972
54C0482	San Jose Street Bridge over San Antonio Creek Channel	1958
54C0553	Palo Verde Street Bridge over San Antonio Creek Channel	1958
54C0555	Ramona Avenue Bridge over San Antonio Creek Channel	1958
	San Antonio Creek Channel	1956-1960

***Impacts Analysis***

As a result of the Phase I cultural resources study, a total of eight cultural resources were identified within or immediately adjacent to (within 50 feet) of the project area (Table 8.7-3). Three of these resources (P-19-187008, -188186, and -190034) are eligible for inclusion in the National Register and/or California Register and are therefore considered historical resources under CEQA. Four of the resources (54C0223, 54C0482, 54C0553, and 54C0555) are not eligible for the National Register, but have not been evaluated for the California Register and one resource (San Antonio Creek Channel) has not been evaluated for the National Register or California Register, and therefore these five resources are also treated as historical resources for the purposes of the project.

**TABLE 8.7-3  
HISTORICAL RESOURCES WITHIN OR IMMEDIATELY ADJACENT TO THE PROJECT AREA**

<b>Identifier</b>	<b>Resource</b>	<b>Eligibility</b>	<b>Project Component</b>	<b>Impact</b>
187008	Lincoln Park Historic District	Listed in the NR	Recycled water pipeline; Booster pump station alternative 2	Pipeline: No impact Booster pump station: LTS with mitigation
188186	Pomona Fellowship Church	Eligible for the NR	Recycled water pipeline	No impact
190034	1524 N Orange Grove Ave	Contributor to Lincoln Park Historic District	Recycled water pipeline	No impact
54C0223	Orchard Avenue Bridge over San Antonio Creek Channel	Not eligible for NR; Not evaluated for CR	Recycled water pipeline	No impact

Identifier	Resource	Eligibility	Project Component	Impact
54C0482	San Jose Street Bridge over San Antonio Creek Channel	Not eligible for NR; Not evaluated for CR	Recycled water pipeline	No impact
54C0553	Palo Verde Street Bridge over San Antonio Creek Channel	Not eligible for NR; Not evaluated for CR	Recycled water pipeline	No impact
54C0555	Ramona Avenue Bridge over San Antonio Creek Channel	Not eligible for NR; Not evaluated for CR	Recycled water pipeline	No impact
	San Antonio Creek Channel	Not evaluated for NR or CR	Recycled water pipeline	No impact

NR = National Register  
CR = California Register

A total of eight historical resources are located within or immediately adjacent to project components and there is the potential for the project to result in a significant impact to historical resources. The project consists of construction of a recycled water pipeline within existing roadway ROWs and the construction of the AWTF and a booster pump station in areas that are currently vacant/undeveloped. Eight historical resources are located within or adjacent to the alignment for the recycled water pipeline (see Table 8.7-3). Five of these eight resources (54C0223, 54C0482, 54C0553, 54C0555, and the San Antonio Creek Channel) will be avoided through the use of jack and bore construction techniques and the project would result in no impact to these five resources. Two of the resources (P-19-188186 and -190034) are adjacent to the recycled water pipeline alignment and will not be affected by the project; therefore the project would result in no impact to these two resources. One resource (P-19-187008) overlaps with a portion of the recycled water pipeline alignment and is also adjacent to the proposed booster pump station Alternative 2. Since the recycled water pipeline would be constructed within existing roadway ROWs and would not affect any of the contributors to the Lincoln Park Historic District (P-19-187008) this component of the project would result in no impact to this resource. The booster pump station consists of an above-ground structure and could result in a significant impact to the district. An impact would occur if construction of the booster pump station results in the substantial adverse change in the significance of the resource. Substantial adverse change is defined as “physical demolition, destruction, relocation, or alteration of the resource *or its immediate surroundings* [emphasis added] such that the significance of a historical resource would be materially impaired” (CEQA Guidelines Section 15064.5(b)(1)). In this case, the construction of a building or structure

that substantially alters the surroundings (i.e., setting) of the resource could result in a loss of integrity of the resource and impair its ability to convey its significance. In general, a project that complies with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (Weeks and Grimer, 1995) is considered to have mitigated its impacts to historical resources to a less-than-significant level (CEQA Guidelines Section 15064.5(b)(3)). With the incorporation of **Mitigation Measure CUL-1**, impacts to resource P-19-187008 (Lincoln Park Historic District) would be less than significant in the event that booster pump Alternative 2 is selected.

Archival research conducted as part of the Phase I cultural resources study indicates that the project area has a moderate sensitivity for prehistoric archaeological resources; two prehistoric archaeological sites with burials have been previously documented within the vicinity of the project area (both sites are within ½-mile of the project area but are not in close proximity to project components). While portions of the project area are in proximity to water sources that could have been attractive resource procurement areas to early inhabitants of the region, these areas have been largely disturbed by modern development. Booster pump station Alternative 1 has a higher likelihood of the presence of buried prehistoric resources since the parcel has never been subject to major development. The project area also has a moderate sensitivity for historic-period archaeological resources; the area was settled as early as the late 1800s and there is evidence of historical uses of the area related to agriculture and commercial enterprise. The AWTF and booster pump station Alternative 2 have a higher likelihood of historic-period archaeological resources given the historical uses of the two parcels. Because of the potential archaeological sensitivity of the area, and since the nature of the proposed project would involve ground-disturbing activities, it is possible that such actions could unearth, expose, or disturb subsurface archaeological resources that were not observable on the surface. With the incorporation of **Mitigation Measures CUL-2, CUL-3, and CUL-4**, impacts to archaeological resources that could qualify as historical resources would be reduced to less than significant.

### ***Mitigation Measures***

**CUL-1:** In the event that booster pump station alternative 2 is selected, IEUA shall retain a qualified architectural historian meeting the Secretary of the Interior's Professional Qualification Standards for architectural history to review and approve the preliminary and final project design plans to ensure that it conforms to the Secretary of the Interior's Standards.

**CUL-2:** A qualified archeologist, defined as an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for archaeology (36 CFR Part 61), or an archaeologist working under the direction of a qualified archaeologist, shall conduct pre-construction cultural resources sensitivity training to inform construction personnel on the types of cultural resources that may be encountered, and to bring awareness to personnel of actions to be taken in the event of a cultural resources discovery. IEUA shall complete training for all

construction personnel and retain documentation showing when training of personnel was completed.

**CUL-3:** Archaeological monitoring shall be conducted for all initial ground-disturbing activities at the AWTF and booster pump station alternatives. If during initial observations of a fair sampling of the area, the monitor determines the area lacks archaeological potential due to evidence of past disturbances, monitoring may be discontinued after consultation with the qualified archaeologist. If it appears that the area appears undisturbed and there is a potential for intact subsurface resources, then full-time monitoring shall be implemented to a depth of 5 feet (anticipated depth of older Quaternary deposits). Monitoring may be discounted at depths above 5 feet if older Quaternary deposits are encountered. Archaeological monitoring shall be conducted by a monitor familiar with the types of archaeological resources that could be encountered within the project area, and under the direct supervision of the qualified archaeologist. The monitor shall observe all ground-disturbing activities, including but not limited to, brush clearance, grubbing, demolition and concrete removal, and grading and excavation and shall be empowered to halt or redirect ground-disturbing activities away from the vicinity of a discovery until the qualified archaeologist has evaluated the discovery and determined appropriate treatment (as prescribed in Mitigation Measure CUL-4). The monitor shall keep daily logs detailing the types of activities and soils observed, and any discoveries. After monitoring has been completed, the qualified archaeologist shall prepare a monitoring report that details the results of monitoring. The report shall be submitted to the IEUA, SCCIC, and any Native American groups who request a copy.

**CUL-4:** In the event of the discovery of archaeological materials, IEUA shall immediately cease all work activities in the area (within approximately 50 feet) of the discovery until it can be evaluated by the qualified archaeologist.. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or tool-making debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-period materials might include stone or concrete footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. Construction shall not resume until the qualified archaeologist has conferred with the IEUA on the significance of the resource.

If it is determined that the discovered archaeological resource constitutes a historical or unique archaeological resource under CEQA, avoidance and preservation in place is the preferred manner of mitigation. Preservation in place maintains the important relationship between artifacts and their archaeological context and also serves to avoid conflict with traditional and religious values of groups who may ascribe meaning to the resource. Preservation in place may be

accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, a Cultural Resources Treatment Plan shall be prepared and implemented by a qualified archaeologist in consultation with the IEUA that provides for the adequate recovery of the scientifically consequential information contained in the archaeological resource. The IEUA shall consult with appropriate Native American representatives in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond that which is scientifically important, are considered.

- b) **Less than Significant with Mitigation.** As discussed above under impact statement (a), there is the potential for subsurface archaeological resources. Should any archaeological resources be discovered, and they do not meet the definition of historical resource (i.e., are not eligible for listing in the California Register), they may be considered for designation as unique archaeological resources (CEQA Guidelines Section 15064.5). If a resource is determined to be a unique archaeological resource as defined in Section 21083.1(g), impacts to the resource could be considered a significant effect on the environment. Implementation of **Mitigation Measures CUL-2, CU3, and CUL-4** would ensure that potential impacts to any unknown unique archaeological resources are less than significant.

***Mitigation Measures***

Implement **Mitigation Measures CUL-2, CUL-3, and CUL-4**

- c) **Less than Significant with Mitigation.** A paleontological database search for fossil localities and fossil-bearing sediments located within the general project area was requested on January 25, 2016 from the Natural History Museum of Los Angeles County (LACM) and the results received on February 09, 2016 (McLeod, 2016). The results indicate that no fossil localities are located within a 1-mile radius of the project area. Surficial deposits within the project site are composed of younger Quaternary alluvium (Qa) derived from the San Gabriel Mountains to the north of the proposed project area. These deposits are composed of alluvial fan deposits delivered to the area via the San Antonio Wash drainage area, which crosses the very eastern portion of the project area. These younger deposits typically do not contain significant vertebrate fossils; however, they are commonly underlain by older Quaternary alluvium, which may well contain significant vertebrate fossil remains (McLeod, 2016).

The LACM reported several vertebrate fossil localities in older Quaternary deposits near the project area. The nearest fossil locality in these deposits is LACM 1728, which is approximately 7 miles due south of the center of the project area, southwest of the City of Chino, and yielded a fossil specimens of fossil horse (*Equus*) and camel (*Camelops*) at a depth of 15-20 feet below the ground surface. The next closest vertebrate locality is LACM 7268 and 7271, which is located approximately 8 miles south of the project area and

produced specimens of fossil horse (*Equus*). The next closest locality, LACM 7508, which is due south of the project area in Soquel Canyon, produced fossil specimens of ground sloth (*Nothrotheriops*) and horse (*Equus*).

While surficial younger Quaternary deposits are unlikely to yield significant paleontological resources, deeper excavations that impact older Quaternary deposits have the potential to produce significant fossils and should be monitored by a paleontologist to quickly recover any specimens while not impeding development. In addition, sediment samples should be collected to determine the potential for microvertebrate recovery (McLeod, 2016).

Preliminary research was conducted on the geology and paleontology of the project area and surrounding area. Geological mapping by Dibblee and Minch (2002) at a scale of 1:24,000 confirmed the surficial geology of the project area to be underlain by recent Quaternary alluvium (map unit Qa) and Quaternary gravel (Map unit Qg) associated with San Antonio Wash, which bisects the easternmost portion of the recycled water pipeline.

Jefferson (1991) reported five Pleistocene (approximately 2.6 million-12,000 years ago) vertebrate fossil localities in the vicinity of the project area from sediments similar to those likely underlying the project at an unknown depth: 1) a species of mammoth (*Mammuthus*) was reported from Pleistocene sediments within the Pomona Valley; 2) an extensive fauna from the Chino Hills that included fish, salamander (*Taricha torosa*), frogs, birds, mammoth (*Mammuthus* sp.), xenarthra, small mammals (*Thomomys* sp., *Dipodomys* sp., and a variety of cricetid rodents), carnivores (Procyonidae, Mustellidae, Canidae, Felidae), horse (*Equus* sp.), camel and llama (Camelidae), antilocaprid ungulates (*Capromeryx* sp. and *Antilocapra* sp.), and *Bison*; 3) the Harvest Development in the Chino Hills yielded specimens of giant ground sloth (*Nothrotheriops shastensis*), proboscidean, and giant horse (*Equus* sp. cf. *gigantea*); 4) the Los Serranos Creek, Aspen Lane locality in Chino produced specimens of horse (*Equus* sp.), deer (*Odocoileus*), and bison (*Bison* cf. *B. antiquus*); and 5) a bison (*Bison* cf. *B. antiquus*) was collected from the Tonner Canyon Locality in Chino Hills (Jefferson, 1991).

Shallow excavations are not likely to impact older sediments that have high potential to yield significant paleontological resources; however, given the preponderance of ice age mammals from similar sediments in the Los Angeles Basin, potential impacts to significant paleontological resources would be reduced to a less-than-significant level with the incorporation of **Mitigation Measures CUL-5, CUL-6, and CUL-7.**

### **Mitigation Measures**

**CUL 5:** Prior to earthmoving activities, a Qualified Paleontologist (QP) meeting the Society of Vertebrate Paleontology (SVP) standards (SVP, 2010) shall be retained. The QP shall contribute to any construction worker cultural resources sensitivity training either in person or via a training module provided to the qualified archaeologist. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the project

site and the procedures to be followed if they are found. The QP shall also oversee the paleontological monitoring (as prescribed in CUL-6) and shall be available to ascertain the significance of any paleontological resources recovered during project excavations (as prescribed in CUL-7). The QP shall also conduct periodic spot-checks of exposed sediments to assist the qualified paleontological monitor in determining the age/sensitivity of exposed sediments and/or paleontological resources encountered during project excavations.

**CUL-6:** Prior to earthmoving activities, a qualified paleontological monitor meeting the Society of Vertebrate Paleontology (SVP) standards (SVP, 2010) shall be retained. The qualified paleontological monitor shall monitor all excavations into native sediments below 5 feet in depth and have the authority to temporarily halt or divert work away from exposed fossils in order to recover the fossil specimens safely and quickly. The qualified paleontological monitor shall complete daily monitoring logs outlining the day's activities. Paleontological monitoring may be increased or decreased if fossils are discovered above 5 feet or if the QP determines that based on subsurface sediments the potential for encountering significant paleontological resources is low.

**CUL-7:** If paleontological resources are encountered during ground-disturbing activities, all work within 100 feet of the find shall halt until the find can be evaluated by the QP and appropriate measures taken to salvage the specimens if they are determined to be potentially significant. If sediments are encountered that are deemed appropriate for the recovery of microvertebrate specimens, the QP shall direct the paleontological monitor to collect a test sample (approximately 600 pounds per SVP standards or an amount determined by the QP) to screen for microvertebrates either on or off site. The QP, based on observations of subsurface soil stratigraphy or other factors, may reduce or discontinue monitoring as warranted if he or she determines that the possibility of encountering fossiliferous deposits is low. The QP shall prepare a final monitoring report to be submitted to the IEUA and filed with the local repository along with any fossils and associated data recovered during construction.

- d) **Less than Significant with Mitigation.** No known cemeteries or other burial places are known to exist within the project area and the proposed project is unlikely to disturb human remains. However, because the proposed project would involve earthmoving activities, it is possible that such actions could unearth, expose, or disturb previously unknown human remains. With the incorporation of **Mitigation Measure CUL-8**, which requires compliance with State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, any project-related impacts to human remains would be less than significant.

#### ***Mitigation Measures***

**CUL-8:** If human remains are encountered, the contractor shall halt work in the vicinity (within 100 feet) of the find and contact the San Bernardino County



Coroner in accordance with Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5. If the County Coroner determines that the remains are Native American, the NAHC will be notified in accordance with Health and Safety Code Section 7050.5, subdivision (c), and Public Resources Code Section 5097.98 (as amended by AB 2641). The NAHC will designate a Most Likely Descendant (MLD) for the remains per Public Resources Code Section 5097.98. Until the landowner has conferred with the MLD, the IEUA shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity, is adequately protected according to generally accepted cultural or archaeological standards or practices, and that further activities take into account the possibility of multiple burials.

- e) **No Impact.** The results of the SLF search indicate that the NAHC does not have any known Native American resources on file.

IEUA initiated consultation with two Native American tribes on April 7, 2016, the Gabrieleño Band of Mission Indians – Kizh Nation and the Morongo Band of Mission Indians. The Agency received a response from the Kizh Nation (copy of response letter provided in Appendix B). Based on the comments in this letter, IEUA has agreed to a mitigation measure (CUL-9) that will provide for a Native American monitor during ground disturbance. The mitigation measure reads:

#### ***Mitigation Measures***

**CUL-9:** During ground disturbing activities (including but not limited to pavement removal, pot-holing or auguring, boring, grading, excavation and trenching) at least one Native American Monitor will be present at the project site. The Native American Monitor will compile monitoring logs on a daily basis. The logs will provide descriptions of the daily activities, including construction activities, locations, soil characteristics and any cultural materials identified. The Monitor shall photo-document the ground disturbing activities. If any cultural materials are identified, the Monitor shall have the authority to redirect construction activities until the extent and importance of the materials are assessed. Subsequent management of any Native American cultural materials shall be determined through consultation between IEUA and the Native American Band supplying the monitor. Any human remains encountered shall be handled through the County Coroner's office and, if necessary, in conjunction with Native American Heritage Commission and Native American Band.

With implementation of this measure any tribal cultural resources accidentally encountered during construction can be managed at a less than significant impact level.

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## 8.8 Geology, Soils, and Seismicity

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>6. GEOLOGY, SOILS, AND SEISMICITY —</b>				
<b>Would the project:</b>				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

- a.i) **Less than Significant.** The Alquist-Priolo Earthquake Fault Zoning Act requires the delineation of zones along active faults in California. The purpose of the Alquist-Priolo Act is to regulate development and prohibit construction on or near active fault traces to reduce hazards associated with fault rupture. The Alquist-Priolo Earthquake Fault Zones are the regulatory zones that include surface traces of active faults. According to the regulatory map provided by the Department of Conservation, the proposed project would not be located within an Alquist-Priolo Earthquake Fault Zone (CDC, 2000). The closest faults to the proposed project site are the San Jose Fault and the Chino Fault (Figure 5). The San Jose Fault crosses the proposed pipeline at the intersection of East McKinley Avenue and Bradford Street, and at the intersection of North Orange Grove Avenue and North Garey Avenue, approximately 100 feet south of the proposed Alternative 2 pump station (City of Pomona 2013). The Chino Fault crosses the proposed pipeline near the intersection of West Orange Grove Avenue and Weber Street, approximately 2,000 feet east of the proposed Alternative 1 pump station. However, adherence to standard

engineering and construction practices and conformance with the California Building Code (CBC) would reduce potential impacts to the non-inhabited pump station structure from groundshaking to a less than significant level. Therefore, due to the low potential for surface rupture at the sites, the potential to expose people or structures to impacts from surface fault rupture resulting from seismic activity is considered less than significant.

- a.ii) **Less than Significant.** Like all of southern California, the proposed project is located in a seismically active area, and has the potential to experience strong ground shaking. The closest active faults to the proposed project site are the San Jose Fault and Chino Fault systems (Figure 5). The San Jose Fault crosses the proposed pipeline route at the intersection of East McKinley Avenue and Bradford Street, and at the intersection of North Orange Grove Avenue and North Garey Avenue, approximately 100 feet south of the proposed Alternative 2 pump station (City of Pomona 2013). The Chino Fault crosses the proposed pipeline near the intersection of West Orange Grove Avenue and Weber Street, approximately 2,000 feet east of the proposed Alternative 1 pump station. A major earthquake associated with these faults could result in moderate to severe ground shaking in the project area and would be a potential hazard to the proposed project. Damage to water pipeline and aboveground structures associated with the proposed project could be expected as a result of ground shaking during a seismic event.

The CBC (California Code of Regulations [CCR] Title 24) provides engineering design criteria for grading, foundations, retaining walls, and structures within zones of seismic activity. The procedures and design limitations for the design of infrastructure are based on site characteristics, configuration, structural system height, and seismic zoning. Seismic zones are mapped areas that are based on proximity to known active faults, the potential for future earthquakes, and intensity of seismic shaking. Seismic zones range from 0 to 4, with areas mapped as Zone 4 being potentially subject to the highest accelerations due to seismic shaking and the shortest recurrence levels. According to the CBC, San Bernardino County and Los Angeles County are within Seismic Zone 4. The proposed project would be designed to include all applicable California Division of Occupational Safety and Health Administration (CAL/OSHA) standards and technical specifications required by the seismic safety codes of the CBC for Seismic Zone 4, in compliance with CCR Title 24, to minimize impacts due to seismic ground shaking. With implementation of all CBC and CAL/OSHA standards, impacts would be considered less than significant.

- a.iii) **Less than Significant.** Liquefaction is a phenomenon whereby unconsolidated and/or near saturated soils lose cohesion and behave as a fluid as a result of severe vibratory motion. The relatively rapid loss of soil shear strength during strong earthquake shaking results in the temporary fluid-like behavior of the soil. Soil liquefaction causes ground failure that can damage roads, pipelines, buildings with shallow foundations, and levees. Liquefaction can occur in areas characterized by water-saturated, cohesionless, granular materials at depths less than 40 feet. Saturated unconsolidated alluvium with earthquake

intensities greater than Modified Mercalli Intensity (MMI) VII may be susceptible to liquefaction. This would include areas with shallow perched groundwater.

According to the Seismic Hazard Zoning Program, a portion of the proposed project is situated in a liquefaction zone (CDC, 2000). The proposed pipeline at the intersection of North Orange Grove Avenue and East McKinley Avenue and the proposed pump station Alternative 2 would be located in the liquefaction zone (refer to Figure 5). The rest of the proposed project would not be within a liquefaction susceptible area (City of Pomona, 2014). Nevertheless, conformance with CBC and standard engineering and construction practices the proposed project would not expose people or structures to substantial adverse effects involving seismic ground-related failure, including liquefaction. Therefore, impacts as a result of liquefaction would be less than significant.

- a.iv) **No Impact.** A landslide is a mass of rock, soil, and debris displaced down-slope by sliding, flowing, or falling. The susceptibility of land (slope) failure is dependent on the slope and geology as well as the amount of rainfall, excavation, or seismic activities. Factors that decrease resistance to movement in a slope include pore water pressure, material changes, and structure. Removing the lower portion of a slope decreases or eliminates the support that opposes lateral motion in a slope. Shaking during an earthquake may lead materials in a slope to lose cohesion and collapse.

According to the Seismic Hazards Map for the City of Pomona and Geological Hazard Overlays Map for the City of Montclair, the nearest potential landslide area would be located approximately 1,000 feet north of the proposed project, with Highway 10 located in between the landslide area and the proposed project (City of Pomona, 2014; San Bernardino County, 2009). In addition, the proposed project would be mainly contained underground below existing roadways or on flat parcels within developed residential and commercial areas. Therefore, the proposed project would not expose people or structures to a significant landslide hazard. No impact would occur.

- b) **Less than Significant with Mitigation.** During construction of the proposed project, excavation and grading activities would expose and disturb surface soils. Excavated soils are highly susceptible to water or wind erosion. Therefore, during project construction, short-term losses of topsoil and subsoil due to wind and water erosion would be potentially significant. Once construction is completed, no stockpiles would remain on the project site/alignment. The site/alignment would be fully paved or developed. Implementation of **Mitigation Measure GEO-1** would ensure that impacts associated with water and wind erosion of soils would be minimized to less than significant levels.

#### ***Mitigation Measures***

**GEO-1:** In accordance with the National Pollution Discharge Elimination System (NPDES) Construction General Permit, IEUA shall prepare a project specific Stormwater Pollution Prevention Plan (SWPPP) to minimize soil erosion. The SWPPP shall prescribe temporary Best Management Practices (BMPs), such as,

but not limited to, sediment barriers and traps, silt basins, and silt fences. In addition, BMPs to permanently stabilize the pipeline alignment and new structural sites shall be installed prior to completing final construction activities. This shall include onsite detention or percolation sufficient to offset a substantial increase in the downstream volume of runoff in the drainage area.

- c) **No Impact.** As discussed above in Section 9.6 a. iii), compliance with the CBC would reduce impacts associated with liquefaction. As discussed above in Section 9.6 a.iv, there are no potential impacts related to landslides. Land subsidence and surface fissures can occur as a result of groundwater extraction. Underlying soils can compact when water is removed. Fissures can form when groundwater levels are lowered. The extraction of mineral or oil resources can also result in subsidence. Construction and operation of the proposed project would not include groundwater extraction and would not lower groundwater levels. The proposed project would not cause soils to become unstable or result in land subsidence or surface fissures. No impact would occur.
- d) **Less than Significant.** The proposed project would be constructed on soils described as Hanford fine sandy loam, Hanford gravelly sandy loam, and Tujunga fine sandy loam (see Figure 6). According to the City of Pomona General Plan Update EIR, Altamont and San Andreas soils have the highest shrink/swell potential. None of the soils in the project area are classified as Altamont or San Andreas soils. In addition, compliance with the CBC would ensure that the project components would be designed to include technical specifications to minimize impacts due to expansive soils, including but not limited to removal, proper fill selection and compaction of expansive soils. Impacts to expansive soils are considered to be less than significant.
- e) **No Impact.** The proposed project would not include the installation or use of septic tanks or alternative wastewater disposal systems. Therefore, no construction or operational impacts associated with septic tanks or alternative wastewater disposal systems would occur.

## References

- California Department of Conservation (CDC), *Alquist-Priolo Earthquake Fault Zoning Act and Regulatory Maps: San Dimas and Ontario Quadrangles*. 2000, Available online: <http://www.quake.ca.gov/gmaps/WH/regulatorymaps.htm>. Accessed December 2015.
- California Department of Conservation (CDC), *Fault Activity Map of California*. 2010, Available online: <http://maps.conservation.ca.gov/cgs/fam/>. Accessed December 2015.
- City of Pomona, City of Pomona 2014 General Plan Update, adopted November 2014.
- City of Pomona. 2013. City of Pomona General Plan Update Environmental Impact Report. July.
- San Bernardino County, Geologic Hazards Overlays Map for Montclair, 2009.

## 8.9 Greenhouse Gas Emissions

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>7. GREENHOUSE GAS EMISSIONS — Would the project:</b>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Setting

Gases that trap heat in the atmosphere are referred to as greenhouse gases (GHGs) because they capture heat radiated from the earth as it is reflected back into the atmosphere, much like a greenhouse does. The accumulation of GHGs has been implicated as a driving force for global climate change. Definitions of climate change vary between and across regulatory authorities and the scientific community, but in general can be described as the changing of the earth's climate caused by natural fluctuations and anthropogenic activities, which alter the composition of the global atmosphere.

Prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), chlorofluorocarbons (CFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>). Carbon dioxide is the "reference gas" for climate change, meaning that emissions of GHGs are typically reported as "carbon dioxide-equivalents" (CO<sub>2</sub>e) measures. There is international scientific consensus that human-caused increases in GHGs have and will continue to contribute to global warming, although there is uncertainty concerning the magnitude and rate of the warming. Potential global warming impacts in California may include, but are not limited to, loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years. Secondary effects are likely to include global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity.

In 2006, California passed the California Global Warming Solutions Act of 2006 (Assembly Bill No. 32; California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32), which requires CARB to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020.

On March 18, 2010, the California Office of Planning and Research (OPR) submitted amendments to the *CEQA Guidelines* for GHG emissions, as required by Public Resources Code section 21083.05. These *CEQA Guideline* amendments provide guidance to public agencies regarding the analysis and mitigation of the effects of GHG emissions in draft CEQA

documents. The amendments are relatively modest changes to various portions of the existing *CEQA Guidelines*.

## Discussion

- a) **Less than Significant.** The proposed project would contribute to global climate change because of GHG emissions, primarily CO<sub>2</sub>, emitted during construction activities. These include installation of a recycled water conveyance system, a booster pump station, and an Advanced Water Treatment Facility (AWTF). After construction is completed, no full-time employees would be needed at the AWTF. Instead, employees from the IEUA service system would maintain the facility as needed. Mobile source emissions generated during project operation would be attributed to the chemical delivery trucks and other operational deliveries. These trips would be relatively minor. Consequently, the resulting GHG emissions would be negligible. Impacts would be considered less than significant.

GHG impacts are considered to be exclusively cumulative impacts (CAPCOA, 2008). Thus, the purpose of this analysis is to determine whether the contribution of GHG emissions by the proposed project would be cumulatively considerable.

The Inland Empire Utilities Agency has not adopted any significance criteria or guidelines for GHG analysis. In addition, neither Pomona nor Montclair has adopted any significance criteria or guidelines for GHG analysis. SCAQMD has issued proposed standards and guidelines, proposing a 10,000 metric ton per year (MT/year) CO<sub>2</sub>e threshold for industrial projects for which it is the lead agency. For the purpose of this analysis, the project's total annual GHG emissions resulting from construction activities have been quantified and evaluated against the 10,000 MT/year CO<sub>2</sub>e screening criteria. As was conducted for the proposed project's air quality analysis in Question 3 (Air Quality), the project's construction-related GHG emissions were estimated for equipment exhaust, truck trips, and worker commute trips using CalEEMod. The construction of the entire project is anticipated to require 18-months. During construction, installation of the proposed water conveyance system would proceed in a linear fashion along the approximately 6-mile proposed pipeline alignment.

Table 8.9-1 shows the project's estimated annual GHG emissions. With respect to construction GHG emissions, SCAQMD recommends that the total emissions for a project be amortized over a 30-year period (SCAQMD, 2008). Total construction-related GHG emissions was calculated to be 649.3 CO<sub>2</sub>e MT/yr. Amortized over 30 years, the proposed project construction-related GHG emissions would be 21.6 CO<sub>2</sub>e MT/yr.



**TABLE 8.9-1  
ESTIMATED PROJECT CONSTRUCTION GHG EMISSIONS**

<b>Emission Source</b>	<b>CO<sub>2</sub>e (MT/yr)</b>
Construction (Amortized over 30 yrs)	21.6
Operational	786.4
<b>Total Annual Emissions</b>	<b>808.0</b>
SCAQMD Recommended Threshold	10,000
Exceed Threshold	No

NOTES: CO<sub>2</sub>e= carbon dioxide equivalent; MT/yr = metric tons per year; see Appendix A for CalEEMod model outputs.

As shown in Table 8.9-1, the proposed project's total annual GHG emissions resulting from construction and operational activities would be approximately 808.0 MT CO<sub>2</sub>e per year. Thus, the project's total annual GHG emissions would not exceed the 10,000 MT of CO<sub>2</sub>e per year screening threshold recommended by SCAQMD. Therefore, the proposed project would not result in the generation of substantial levels of GHG emissions and would not result in emissions that would adversely affect the statewide attainment of GHG emission reduction goals of AB 32. This impact would be less than significant.

- b) **Less than Significant.** The project's GHG emissions would be less than significance thresholds established by the SCAQMD. In addition, neither Pomona nor Montclair has developed Climate Action Plans to reduce GHG emissions. Consequently, the project would not conflict with an applicable plan, policy, or regulation adopted to reduce GHG emissions. This impact would be less than significant.

**References**

SCAQMD, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold. October, 2008.

## 8.10 Hazards and Hazardous Materials

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No impact</i>
<b>8. HAZARDS AND HAZARDOUS MATERIALS — Would the project:</b>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Discussion

- a,b) **Less than Significant.** Construction of the proposed project would require equipment that utilizes hazardous materials such as petroleum fuels and oil. During construction activities, hazardous materials could accidentally be spilled or otherwise released into the environment exposing construction workers, the public and/or the environment to potentially hazardous conditions. Construction activities that involve hazardous materials would be governed by several agencies, including the Environmental Protection Agency (EPA), Department of Transportation (DOT), California Division of Occupational Safety and Health (Cal/OSHA), and the California Department of Toxic Substances Control (DTSC). IEUA and construction contractors would be required to implement BMPs for handling hazardous materials during construction activities, including following manufacturers' recommendations and regulatory requirements for use, storage, and disposal of chemical products and hazardous materials used in construction; avoiding over-topping construction equipment fuel tanks; routine maintenance of construction

equipment, properly containing and removing grease and oils; and properly disposing of discarded containers of fuels and other chemicals. In addition, construction contractors would be required to implement safety measures in accordance with the General Industry Safety Orders for Spill and Overflow Control (CCR Title 8, Sections 5163-5167) to protect the project area from contamination due to accidental release of hazardous materials. Disposal of all hazardous materials must be done in compliance with applicable California hazardous waste disposal laws. In the event of an accidental release of hazardous materials during construction, containment and clean up would occur in accordance with applicable regulatory requirements, and oil and other solvents used during maintenance of construction equipment would be recycled and disposed of in accordance with applicable regulatory requirements.

Once constructed, the proposed project would transmit treated recycled water for groundwater replenishment and possible irrigation end use. The California Department of Public Health (CDPH) finds that the use of recycled water in accordance with Title 22 (CCR Section 60001 et seq) is presumed to have a less than significant impact on public health and safety. Operation of the proposed pipeline component would not require routine transport, use, or disposal of hazardous materials. However, operation of the proposed AWTF would store chemicals required for the treatment of water on site. In addition, operation of the proposed AWTF and proposed pump station would involve the use of household/industrial cleaning products. Mishandling hazardous materials, such as improper storage or disposal, could potentially expose the public or the environment to hazardous materials. However, compliance with applicable federal, state, and local laws would minimize the potential risks associated with the handling of hazardous materials and foreseeable accidents. Therefore, potential impacts to the public or the environment through accidental release due to the routine transport, use, or disposal of hazardous materials would be less than significant.

- c) **Less than Significant.** The AWTF and Alternative 1 pump station would not be located within 0.25 miles of a school. However, there are several schools located along the pipeline route from its starting location in the City of Pomona until it reaches the AWTF in the City of Montclair. In addition, Lincoln Elementary School is located within 0.25 miles of the Alternative 2 pump station. The following schools are located within 0.25 miles of the proposed pipeline:
- Roosevelt Elementary School is located 0.19 miles south of the proposed pipeline along West Orange Grove Avenue between North Hamilton Boulevard and North Huntington Street.
  - Lincoln Elementary School is located 0.09 miles southeast of the proposed pipeline, and 0.21 miles southeast of the Alternative 2 pump station, along W. Orange Grove Avenue between N. Gordon Street and North Garey Avenue.
  - Emerson Middle School is located adjacent (approximately 0.02 miles) to the pipeline as it traverses south on North Towne Avenue then east on Lincoln Avenue

- Kingsley Elementary School is located adjacent (approximately 0.02 miles) to the proposed pipeline along Lincoln Avenue between Washington Avenue and Sheridan Avenue within the City of Pomona.
- Montvue Elementary School is located approximately 0.23 miles north of the pipeline along Lincoln Avenue between Indian Hills Blvd and Sheridan Avenue within Pomona.
- Montclair High School is located approximately 0.12 miles east of the proposed pipeline along Ramona Ave within the City of Montclair.

Hazardous materials deliveries and transport during construction would be confined to designated roads that would potentially travel near schools. Construction workers would utilize applicable BMPs and would be required to comply with existing and future hazardous materials laws and regulations for the transport, use and disposal of hazardous materials. Due to the short duration of construction activities and with adherence to federal, state and local laws and regulations, construction related hazardous materials impacts would be considered less than significant.

Operation of the AWTF would require the use and transport of chemicals required to produce tertiary treated recycled water for groundwater recharge. The proposed AWTF would include construction of a chemical storage building that would house all chemicals. These materials would be handled by trained professionals and would include secondary containment. Further, the AWTF would be located within an existing facility (Plant 28) and not be located within a quarter mile of a school. Based on the proposed containment facilities and adherence to federal, state and local laws and regulations, the proposed project would not substantially increase health risks and hazards associated with releases of hazardous materials near schools and the community. The proposed project would result in a less than significant impact to public health.

- d) **Less than Significant.** Government Code Section 65962.5 requires the California Environmental Protection Agency (Cal EPA) to develop and annually update the Hazardous Waste and Substances Sites (Cortese) List. The Cortese List is a planning document used by state and local agencies to comply with CEQA requirements in providing information about the location of hazardous materials release sites. The information contained in the Cortese List is provided by DTSC and other state and local government agencies.

The proposed project sites/alignment is not listed on the Cortese List (DTSC, 2015). The DTSC Envirostor Database was searched for hazardous material sites within the project vicinity. Several hazardous materials sites were found within a one mile radius of the proposed project area. A total of eight Leaking Underground Storage Tank (LUST) cleanup sites were found within the project vicinity. Of the eight LUST sites, seven were classified as Completed-Case Closed sites. The open LUST cleanup site is listed as TTK Valero, located at 1903 West Holt Avenue, approximately 0.20 miles west of the

western portion of the pipeline and the Alternative 1 pump station. The open LUST site lists potential soil contamination from gasoline, but has been eligible for closure since 2014. The proposed project is not located on the LUST site, and is located at a far enough distance from known sites that the contaminated soil would not reach the project site. Therefore, impacts related to hazardous materials sites would be less than significant.

- e) **Less than Significant.** The nearest airport to the proposed project is the Brackett Field Airport located within the City of La Verne, approximately 1.6 miles north of the proposed project. The proposed pipeline along West Orange Grove Avenue and the proposed pump station sites are located within the Airport Influence Area (Los Angeles County Airport Land Use Commission, 2015). Because the proposed pipeline would be underground, it would not be affected by airport-related noise, overflight, safety, or airspace protection. The Brackett Field Airport Land Use Compatibility Plan (ALUCP) designates the proposed project to be located within Zone E. According to the ALUCP, water facilities are designated to be compatible land uses. The aboveground pump station would be similar to existing structures where it would be located and would consist of a low profile structure, shorter than a two-story building. Similarly, the AWTF facilities would be constructed at similar heights as the existing tanks and structures. Therefore, the proposed project would not pose any airport safety hazards for people residing or working in the area, and impacts would be less than significant impacts.
- f) **No Impact.** There are no private airstrips within the vicinity of the proposed project. Therefore, there would be no safety hazards to people working or residing in the project area. No impact would occur.
- g) **Less than Significant with Mitigation.** Construction of the proposed project would require transportation of equipment and materials within the ROW of Erie Street, West Holt Avenue, West Orange Grove, McKinley Avenue, North Town Avenue, and Lincoln Avenue in the City of Pomona and the ROW of Orchard Street and Ramona Avenue in the City of Montclair. Construction within these ROWs could interfere with emergency response or evacuation plans. Roadways could be temporarily affected due to operation or storage of construction equipment and material deliveries, particularly during construction of the proposed pipeline. Project construction would not result in complete roadway closures but would result in lane closures, which would affect traffic flows. Implementation of a Traffic Control/Traffic Management Plan, as described in **Mitigation Measure TR-1** within Section 9.16, would ensure there would be no interference with emergency response and evacuation plans. Operations of the proposed project would only require weekly employee trips to maintain the facility and would not cause a significant impact to the emergency evacuation routes. The Traffic Control/Traffic Management Plan would ensure that all roads remain passable to emergency service vehicles at all times. With implementation of **Mitigation Measure TR-1**, impacts would be considered less than significant.

## **Mitigation Measures**

Implement **Mitigation Measure TR-1**.

- h) **No Impact.** The proposed project would be located in the City of Pomona and the City Montclair within a highly built up urban area (residential and commercial areas). According to the California Department of Forestry and Fire Protection (CAL FIRE), the proposed project is not located within a Very High Fire Hazard Severity Zone (CAL FIRE, 2007). In addition, according to the General Plan of Pomona, the proposed project site is not within a fire hazard area (City of Pomona General Plan Update, 2014). No impact would occur.

## **References**

CAL FIRE, Fire Hazard Severity Zones in Local Responsibility Area, September 2007, [http://www.fire.ca.gov/fire\\_prevention/fire\\_prevention\\_wildland\\_statewide](http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland_statewide), accessed on December 30, 2015.

California Department of Toxic Substances Control (DTSC), Cortese List, [http://www.dtsc.ca.gov/SiteCleanup/Cortese\\_List.cfm](http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm), accessed on December 28, 2015.

California Department of Toxic Substances Control(DTSC), Envirostor, <http://www.envirostor.dtsc.ca.gov/public/>, accessed on December 28, 2015.

City of Pomona, General Plan Update 2014, adopted March 2014.

City of Montclair, Montclair General Plan, 1999.

Los Angeles County Airport Land Use Commission, Bracket Field Airport Land Use Compatibility Plan Draft, June 2015.

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## 8.11 Hydrology and Water Quality

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>9. HYDROLOGY AND WATER QUALITY — Would the project:</b>				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of a site or area through the alteration of the course of a stream or river, or by other means, in a manner that would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of a site or area through the alteration of the course of a stream or river, or by other means, substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

- a,f) **Less Than Significant with Mitigation.** Construction of the proposed project would involve excavation and grading. Sediment associated with earthmoving activities and exposed soil would have the potential to erode and be transported to down gradient areas, potentially resulting in water quality standard violations. In the event of heavy rain, erosion of the stockpiles may occur resulting in scouring and sedimentation of local drainages. Additionally, the storm water passing through the construction sites has the potential to pick up any chemicals from the staging site itself (such as fuels or oil from construction equipment), which may pass into the local storm water collection system,

impacting water quality. However, implementation of **Mitigation Measure GEO-1**, as described within Section 9.6, would result in the preparation of a project specific SWPPP to minimize soil erosion. The SWPPP would identify site-specific BMPs to control erosion, sediment, and other potential construction-related pollutants. Compliance with the SWPPP would maintain water quality in accordance with the RWQCB standards such that construction of the proposed project would not violate any water quality standards. Implementation of Mitigation Measure GEO-1 would ensure erosion control and construction impacts would be considered less than significant.

Operation of the proposed recycled water pipeline could result in cross contamination of potable water pipelines, which could result in reduced water quality and potential public health concerns. Currently all areas considered for irrigation with recycled water are being irrigated with potable water and thus have potable water pipes tied into their irrigation systems. To avoid cross-contamination of potable water with recycled water, backflow prevention devices would be required in accordance with CCR Title 17, Group 4, Article 2, Protection of Water System. Additionally, the Health and Safety Code, Division 104, Part 12, Chapter 5, Article 2, Section 116815 states: "All pipes installed above or below ground, on or after June 1, 1993, that are designed to carry recycled water, shall be colored purple or distinctively wrapped with purple tape."

In addition, minimum separation standards for potable and non-potable water pipelines are included in CCR Title 22, Division 4, Chapter 16, Article 4, Materials and Installations of Water Mains and Appurtenances. In accordance with Section 64572, Water Main Separation, all proposed recycled water pipelines would have at least a 10 foot horizontal separation and one (1) foot vertical separation from any parallel potable water mains. Implementation of local, state and federal regulatory requirements would minimize any potential risks of water quality contamination to less than significant levels.

Operation of the proposed project would be subject to conditions imposed by the Santa Ana RWQCB pursuant to Water Recycling Requirements (WRRs) and Waste Discharge Requirements (WDRs). Recycled water use associated with the proposed project would comply with the California Department of Public Health (CDPH) recycled water regulations contained in Title 22 of the CCR. Recycled water provided by the Pomona Water Reclamation Plant (PWRP) would be treated to disinfected tertiary levels. As such, the product recycled water may be used for end use categories, including but not limited to the following applications: landscape irrigation of parks, schools, golf courses, freeways, greenbelts, cemeteries, and landfills; landscape impoundments; fire suppression; city maintenance and street cleaning operations; culvert jetting; and construction applications, such as dust control. The recycled water end uses identified for the proposed project are included in the Title 22 regulations. To be used as a source supply for these designations, the reclaimed effluent would at all times be adequately oxidized, clarified, filtered, and disinfected.

However, there is the concern for water quality impacts at the recycled water end user sites. Of particular concern is the impact to surface water and groundwater quality that



could result due to the higher levels of TDS, nitrogen, and other nutrients in the recycled water relative to potable water. The over-application of recycled water would have the potential to affect surface water quality if this resulted in surface ponding or direct runoff to local creeks or other water bodies.

To address these water quality concerns, SWRCB adopted a statewide General Permit for landscape irrigation uses of recycled water, pursuant to AB 1481 in July 2009 (SWRCB Water Quality Order No. 2009-0006-DWQ, General Waste Discharge Requirements For Landscape Irrigation Uses Of Municipal Recycled Water [General Permit]). The Landscape Irrigation General Permit states that landscape irrigation with recycled water is a viable strategy to reduce potable water demand. Specified uses of recycled water considered "landscape irrigation" projects include any of the following:

- i. Parks, greenbelts, and playgrounds;
- ii. School yards;
- iii. Athletic fields;
- iv. Golf courses;
- v. Cemeteries;
- vi. Residential landscaping, common areas;
- vii. Commercial landscaping, except eating areas;
- viii. Industrial landscaping, except eating areas; and
- ix. Freeway, highway, and street landscaping.

To obtain coverage under this Landscape Irrigation General Permit, IEUA would need to submit a Notice of Intent (NOI) form and an Operations & Maintenance Plan. The Landscape Irrigation General Permit includes requirements for recycled water treatment standards and requires producers and distributors of the recycled water to satisfy applicable requirements of the State Recycled Water Policy. Use of recycled water in accordance with this General Permit would ensure protection of public health and the environment, including water quality.

The SWRCB has stated in its adopted Recycled Water Policy (January 22, 2013) that the discharge of salts and nutrients to groundwater can be reasonably controlled by applying water at agronomic rates for recycled water landscape irrigation projects (SWRCB, 2013). Irrigation of landscapes at agronomic rates also reduces impacts to surface waters by reducing the potential for ponding and recycled water runoff. This nutrient management practice would be sufficient to protect beneficial uses and water quality as prescribed in applicable basin plans, water quality control plans, and water quality control policies.

The SWRCB has acknowledged that use of recycled water for irrigation or other water supply augmentation can affect concentrations of salts and nutrients in groundwater

basins, in excess of the water quality objectives established in Basin Plans. The regulation of recycled water itself is not adequate to address this issue; rather, SWRCB is encouraging every region in California to develop a salt/nutrient management plan by 2015. Because each groundwater basin or watershed is unique, the plan detail and complexity will depend on the extent of local salt and nutrient problems. The Santa Ana RWQCB adopted a Salt Management Plan as part of the 1995 Basin Plan in 2004, with updates in 2012 and 2014. The Plan includes: basin-wide water quality monitoring; basin loading – assimilative capacity estimates; salt mitigation strategies; anti-degradation analysis; and emerging constituent consideration.

The proposed project's use of recycled water for landscape irrigation would be in accordance with the Landscape Irrigation General Permit, State Recycled Water Policy, and Santa Ana RWQCB Basin Plan, which would ensure that water quality standards are met and that water quality would not be degraded. Operational impacts would be considered less than significant.

### ***Mitigation Measures***

#### **Implementation of Mitigation Measure GEO-1.**

- b) **No Impact.** The proposed project would redirect recycled water flow to the proposed AWTF and discharge into the Montclair Basin. Implementation of the proposed project would help recharge groundwater and would not deplete the volume of groundwater. There would be no significant impact on the groundwater supply such that a net deficit in the aquifer volume occurs.
  
- c,d) **Less than Significant with Mitigation.** Construction of the proposed project would temporarily alter the localized drainage pattern at the proposed project site due to ground-disturbing activities, such as grading and excavation, construction of new building foundations, and trenching. Such alterations in the drainage pattern may temporarily result in erosion or siltation and/or increase the rate or amount of surface runoff if substantial drainage is rerouted. However, implementation of **Mitigation Measure GEO-1**, as described within Section 9.6, would prepare a project specific SWPPP to minimize the potential for erosion or siltation and flooding through the implementation of BMPs. Therefore, impacts associated with substantial erosion and temporary drainage alterations including flooding during construction would be less than significant with mitigation. Over the long term the drainage pattern will be generally maintained in its current configuration.

Once construction is complete, the project areas for the recycled water pipeline would be returned to pre-construction conditions and would not increase the amount of impervious surfaces. Thus, the proposed pipeline would not substantially alter the existing drainage pattern or substantially increase surface runoff. However, the construction of the pump station and AWTF may result in a net increase in impervious surfaces. The pump station locations Alternative 1 and Alternative 2 are undeveloped parcels. The AWTF location is within an existing plant treatment site. However, implementation of Mitigation Measure

GEO-1 and adherence to the NPDES and Landscape Irrigation permit of the Santa Ana region would require implementations of operational BMPs. Therefore, with adherence to all applicable requirements, impacts associated with substantial erosion or drainage alterations including flooding during operation would be less than significant with mitigation.

***Mitigation Measures***

Implementation of **Mitigation Measure GEO-1.**

- e) **Less than Significant with Mitigation.** Construction of the proposed project would temporarily alter flow at the project site due to ground disturbing activities, such as grading and excavation, construction of new building foundations, and trenching. However, with implementation of **Mitigation Measure GEO-1**, as described within Section 9.6, BMPs would minimize the potential for flooding on- and off-site, reducing construction impacts to stormwater drainage systems to a less than significant level.

Once construction is complete, the project areas for the recycled water pipeline would be returned to pre-construction conditions and would not increase the amount of impervious surfaces. Thus, the proposed pipeline would not substantially alter the existing drainage pattern or substantially increase surface runoff. However, the construction of the pump station and AWTF may result in a net increase in impervious surfaces. Implementation of Mitigation Measure GEO-1 and adherence to the NPDES and Landscape Irrigation permit of the Santa Ana region would require implementations of operational BMPs. Therefore, with adherence to these requirements, the proposed project would not create runoff water that would exceed the capacity of the existing stormwater drainage systems or create substantial polluted runoff sources. Impacts would be less than significant with mitigation.

***Mitigation Measures***

Implementation of **Mitigation Measure GEO-1.**

- g) **No Impact.** The proposed project does not include the construction of housing. Therefore, no housing would be placed within a 100-year flood hazard area. No impact would occur.
- h) **No Impact.** The Flood Insurance Rate Maps (FIRMs) produced by the Federal Emergency Management Agency (FEMA) indicate areas prone to flood hazards due to major storm events, including 100-year and 500-year flood zones. According to the FEMA maps, the proposed project would not be located in 0.2 percent annual chance flood hazard areas. Because the proposed project would not be located within a 100-year flood hazard area, no impact would occur.
- i) **No Impact.** The proposed project would not expose people or structures to a significant risk of loss, injury, or death involving flooding due to failure of a levee or dam. The proposed project is not located near a levee or dam; the proposed project would not

involve construction or other activities that would alter the stability of any levee or dam, or any other flood control structure. There would be no impact.

- j) **No Impact.** The proposed project site is approximately 30 miles northeast from the Pacific Ocean. The proposed project would not expose people or structures to a significant risk of loss, injury, or death due to seiches or tsunamis. The proposed project would be located primarily in areas characterized by flat topography except for possible low-lying hillside locations about 1 mile north. It is anticipated that the proposed project would not expose people or structures to a significant risk of loss, injury, or death due to mudflows. No impacts would occur.

## **References**

Federal Emergency Management Agency (FEMA), Flood Map Service Center, Digital Flood Insurance Rate Maps, Available online at: <http://msc.fema.gov/portal> , accessed February 2016.

State Water Resources Control Board, Resolution No. 2013-0003, January 2013.

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## 8.12 Land Use and Land Use Planning

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>10. LAND USE AND LAND USE PLANNING — Would the project:</b>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

- a) **No Impact.** The majority of the proposed project, once constructed, would be entirely underground. Aboveground structures include a booster pump station and the AWTF. The proposed pump-station and advanced water treatment facility would range in area from 0.5 to 2.5 acres. The AWTF will be located within an existing compound dedicated to water management. The proposed project would not create a barrier or physically divide an established community. No impact would occur.
- b) **Less than Significant with Mitigation.** The majority of the proposed project, once constructed, would be entirely underground. Aboveground structures would include a pump station and the AWTF. Land uses within the project area are under the jurisdictions of the City of Pomona and City of Montclair. The proposed pump station Alternative 1 and Alternative 2 locations and the western portions of the proposed pipeline would be located in the City of Pomona while the eastern portion of the pipeline and the AWTF would be located in the City of Montclair. The pipeline would be constructed underground within existing street ROWs and would not conflict with any applicable land use plans, policies, or regulations.

According to the City of Pomona General Plan Update, the proposed pump station Alternative 1 is located within an Urban Neighborhood land use, and proposed pump station Alternative 2 is located within a Neighborhood Edge land use (City of Pomona, 2014). As a condition of the project, IEUA may need to obtain a Conditional Use Permit (CUP) to allow the pump station use on the Alternative 1 or Alternative 2 site locations. If a CUP is issued, the pump station would be allowed on the site even though this use is not specifically allowed under the City of Pomona General Plan and Zoning Code designations. This is because the Government code section 53091 (e) states that “Zoning ordinances of a county or city shall not apply to the location of facilities for the production, generation, storage, treatment, or transmission of water...”

In the City of Montclair, the proposed AWTF is located on Public/Quasi Public land (City of Montclair, 2013). The proposed AWTF would be constructed within designated Public land; however, it would be located within the existing MVWD Plant 28 facility and would not cause a change to the current land use or create a significant impact to its land use designation. Therefore, land use impacts regarding the AWTF would be considered less than significant.

The proposed project is located within the airport influence area of the Brackett Field Airport located in the City of La Verne, about 1.6 miles north of the proposed project area. The proposed pipeline along West Orange Grove Avenue and the proposed pump station sites are located within the Airport Influence Area (Los Angeles County Airport Land Use Commission, 2015). Because the pipeline would be underground, they would not be affected by airport-related noise, overflight, safety, or airspace protection. The Brackett Field Airport Land Use Compatibility Plan (ALUCP) designates the proposed project to be located within Zone E, and water facilities are designated to be compatible land uses. Thus, the proposed pump station would be compatible with the ALUCP, and impacts would be less than significant.

- c) **No Impact.** The proposed project components do not occur in areas which fall under the jurisdiction of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved or proposed local, regional, or state habitat conservation plan. No impact would occur.

## References

City of Montclair, General Plan Land Use Map, updated July 2013.

City of Pomona, General Plan Update Public Review Draft: General Plan Land Uses Map, March 2011.

City of Pomona, General Plan Update, 2014.

Los Angeles County Airport Land Use Commission, Brackett Field Airport Land Use Compatibility Plan, December 9, 2015.

## 8.13 Mineral Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>11. MINERAL RESOURCES — Would the project:</b>				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

- a,b) **No Impact.** According to the Surface Mining and Reclamation Act (SMARA) Mineral Land Classification maps, the proposed project is located in an area with a mineral land classification of MRZ-2, which means that significant PCC-Grade aggregate resources are present. However, the SMARA Mineral Land Classification map also classifies the project area as Urban. Land uses and zoning in the City of Pomona and City of Montclair adjacent to the proposed project site are primarily residential, except for scattered commercial and industrial parcels. There is little likelihood that aggregate mining would occur on the small parcels proposed as pump station alternative sites, the AWTF proposed site, or along the water pipeline alignment. Thus, there would be no impact to mineral resources.

### References

Surface Mining and Reclamation Act (SMARA), *Updated Mineral Land Classification Map for Portland Cement-Concrete Grade Aggregate in the Claremont-Upland Production-Consumption (P-C) Region, Los Angeles and San Bernardino Counties*. Available online: <http://maps.conservation.ca.gov/cgs/informationwarehouse/>, 2007.

## 8.14 Noise

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>12. NOISE — Would the project:</b>				
a) Result in Exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Setting

Noise is generally defined as unwanted sound. Sound, traveling in the form of waves from a source, exerts a sound pressure level (referred to as sound level) that is measured in decibels (dB), which is the standard unit of sound amplitude measurement. The dB scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound, with 0 dB corresponding roughly to the threshold of human hearing and 120 to 140 dB corresponding to the threshold of pain. Pressure waves traveling through air exert a force registered by the human ear as sound.

Sound pressure fluctuations can be measured in units of hertz (Hz), which correspond to the frequency of a particular sound. Typically, sound does not consist of a single frequency, but rather a broad band of frequencies varying in levels of magnitude. When all the audible frequencies of a sound are measured, a sound spectrum is plotted consisting of a range of frequency spanning 20 to 20,000 Hz. The sound pressure level, therefore, constitutes the additive force exerted by a sound corresponding to the sound frequency/sound power level spectrum.

The typical human ear is not equally sensitive to all frequencies of the audible sound spectrum. As a consequence, when assessing potential noise impacts, sound is measured using an electronic filter that deemphasizes the frequencies below 1,000 Hz and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to extremely low and extremely high frequencies. This method of frequency weighting is referred to as A-weighting and is expressed in units of A-weighted decibels (dBA). A-weighting follows an international standard



methodology of frequency deemphasis and is typically applied to community noise measurements.

An individual's noise exposure is a measure of noise over a period of time. While a noise level is a measure of noise at a given instant in time, community noise varies continuously over a period of time with respect to the contributing sound sources of the community noise environment. Community noise is primarily the product of many distant noise sources, which constitute a relatively stable background noise exposure, with the individual contributors unidentifiable. The background noise level changes throughout a typical day, but does so gradually, corresponding with the addition and subtraction of distant noise sources such as traffic. What makes community noise variable throughout a day, besides the slowly changing background noise, is the addition of short-duration, single-event noise sources (e.g., aircraft flyovers, motor vehicles, sirens), which are readily identifiable to the individual.

These successive additions of sound to the community noise environment change the community noise level from instant to instant, requiring the measurement of noise exposure over a period of time to legitimately characterize a community noise environment and evaluate cumulative noise impacts. This time-varying characteristic of environmental noise is described using statistical noise descriptors. The most frequently used noise descriptors are summarized below:

- L<sub>eq</sub>:** The L<sub>eq</sub>, or equivalent sound level, is used to describe noise over a specified period of time in terms of a single numerical value; the L<sub>eq</sub> of a time-varying signal and that of a steady signal are the same if they deliver the same acoustic energy over a given time. The L<sub>eq</sub> may also be referred to as the average sound level.
- L<sub>max</sub>:** The maximum, instantaneous noise level experienced during a given period of time.
- L<sub>min</sub>:** The minimum, instantaneous noise level experienced during a given period of time.
- L<sub>dn</sub>:** Also termed the DNL, the L<sub>dn</sub> is the average A-weighted noise level during a 24-hour day, obtained after an addition of 10 dBA to measured noise levels between the hours of 10:00 P.M. to 7:00 A.M. to account nighttime noise sensitivity.
- CNEL:** CNEL, or Community Noise Equivalent Level, is the average A-weighted noise level during a 24-hour day that is obtained after an addition of 5 dBA to measured noise levels between the hours of 7:00 P.M. to 10:00 P.M. and after an addition of 10 dBA to noise levels between the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively.

An important way of predicting a human reaction to a new noise environment is the way it compares to the existing environment to which one has adapted (i.e., comparison to the ambient noise environment). In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level would be judged by those exposed to it. With regard to increases in A-weighted noise level, the following relationships generally occur:

- Except in carefully controlled laboratory experiments, a change of 1 dBA cannot be perceived;

- Outside of the laboratory, a 3 dBA change in noise levels is considered to be a barely perceivable difference;
- A change in noise levels of 5 dBA is considered to be a readily perceivable difference; and
- A change in noise levels of 10 dBA is subjectively heard as doubling of the perceived loudness.

These relationships occur in part because of the logarithmic nature of sound and the decibel system. The human ear perceives sound in a non-linear fashion; hence the decibel scale was developed. Because the decibel scale is based on logarithms, two noise sources do not combine in a simple additive fashion, but rather logarithmically. For example, if two identical noise sources produce noise levels of 50 dBA, the combined sound level would be 53 dBA, not 100 dBA.

Noise levels from a particular source generally decline as distance to the receptor increases. Other factors, such as the weather and reflecting or barriers, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically "hard" locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically "soft" locations (i.e., the area between the source and receptor is normal earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. Noise levels may also be reduced by intervening structures – generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA.

## Discussion

- a,d) **Less than Significant with Mitigation.** A significant impact may occur if the proposed project would generate excessive noise that exceeds the noise level standards set forth in the General Plan Noise Element and Code of Ordinances of the City of Montclair and the City of Pomona. According to Impact 9.12(d), a significant impact may also occur if the proposed project would result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity. The proposed project consists of the construction of a pump station, an AWTF, and a new recycled water pipeline. Noise sources from the operation of the pump station and water treatment facility would include electric pumps, filters, tanks, other mechanical and electrical components, and delivery vehicles. The various mechanical and electrical components for both the pump station and AWTF would be housed behind block sound walls or completely enclosed in an industrial facility. Some facility components such as truck loading docks, vehicle parking, and certain electrical and mechanical components would be located outdoors in unenclosed areas. Most noise generating components would be located in noise-attenuating enclosures and the remainder of the project would consist of underground water pipeline, therefore potential noise impacts associated with the project would

primarily occur during the construction phase. Thus, this analysis focuses on the potential noise impacts that could result from construction of the proposed project.

### **Construction Noise**

Construction of the proposed project's pipeline would occur in multiple pipeline segments spanning a length of approximately 31,700 linear feet. Construction of the proposed recycled water pipeline would involve trenching using a conventional cut and cover technique, and jacking and boring where necessary. No dewatering would be required. The trenching technique would include saw cutting of the pavement where applicable, trench excavation, pipe installation, backfill operations, and re-surfacing to the original condition. The trench would be approximately 6 feet deep and 5 feet wide. The pipeline would be installed a minimum of 4 feet below ground surface (bgs). The construction corridor would be approximately 20 feet wide to allow for traffic control, staging areas and vehicle access. Construction staging areas would be identified by the contractor for pipe lay-down, soil stockpiling, and equipment storage. On average, 200 linear feet of pipeline may be installed per day. The construction equipment needed for pipeline installation includes: backhoe, excavator, bracing, welding equipment, boom lift truck, steam roller, and a plate compactor. During each construction phase there would be a different mix of equipment operating; noise levels would vary based on the amount of equipment in operation and the location of each activity. As such, construction activity noise levels at and near each open-trench or jack and bore site would fluctuate depending on the particular type, number, and duration of use of the various pieces of construction equipment.

Construction of the AWTF would require site clearing and demolition, installation of equipment, and site completion. The construction equipment needed for this project component includes: backhoe, loader, dump trucks, crew trucks, concrete trucks, cranes, compactor, delivery trucks, and a water truck. Interstate-10 is located 100 feet north of the proposed AWTF, increasing the ambient noise of the surrounding area.

**Table 8.14-1** shows the measured maximum noise levels ( $L_{max}$ ) produced by various types of construction equipment based on a distance of 50 feet between the equipment and noise receptor. It should be noted that  $L_{max}$  noise levels associated with the construction equipment would only be generated when the equipment are operated at full power. Typically, the operating cycle for a piece of construction equipment would involve one or two minutes of full power operation followed by three or four minutes at lower power settings. As such, the  $L_{max}$  noise levels shown in Table 8.14-1 would only occur occasionally throughout the construction day.

During the project's construction activities, off-site sensitive receptors to the pipeline trenching sites would be located along West Orange Grove Avenue, McKinley Avenue, Lincoln Avenue, and other roads in residentially zoned areas of the Cities of Pomona and Montclair. Off-site sensitive receptors also exist adjacent to the two alternative proposed pump station sites and the proposed AWTF site. Specifically, the nearest

sensitive receptors to the proposed pump station sites and the AWTF are residential houses located within 30 feet.

The City of Pomona regulates the noise generated from construction-related activities via restricting hours of construction and noise levels. The City of Pomona Municipal Code Section 18-305 exempts these activities from noise prohibitions provided they do not take place between the hours of 8:00 p.m. and 7:00 a.m. on weekdays, including Saturday, or at any time on Sunday or a federal holiday and do not exceed 65dB(A). Additionally, the City of Pomona Municipal Code Section 18-305(3) states 65 dBA plus the limits specified in 18-311(b) as measured on residential property and any vibration created does not endanger the public health, welfare, and safety. The City of Pomona Municipal Code Section 18-311 limits noise levels per designated Noise Zones 1-5, see Table 8.14-1 below.

According to the City of Pomona Municipal Code, the designated noise zones are as follows: Noise Zone 1 is single-family properties, Noise Zone-2 is multiple-family properties, Noise Zone 3 is Commercial properties, Noise Zone-4 is Industrial properties, and Noise Zone-5 is High traffic corridors.

**TABLE 8.14-1  
CITY OF POMONA SECTION 18-311(A) EXTERIOR NOISE STANDARDS**

<b>Noise Zone</b>	<b>Time Interval</b>	<b>Allowable Interior Noise Level (dBA)</b>
1	10 PM to 7 AM	50
	7 AM to 10 PM	60
2	10 PM to 7 AM	50
	7 AM to 10 PM	65
3	10 PM to 7 AM	60
	7 AM to 10 PM	65
4	Any	70
5	Any	70

Source: City of Pomona Municipal Code

Furthermore, Section 18-311(b) prohibits any person to create any noise exceedance of the following:

- 1) The noise standard for a cumulative period of more than 30 minutes in a hour;
- 2) The noise standard plus 5 dBA for a cumulative period of more than 15 minutes in any hour;
- 3) The noise standard plus 10 dBA for cumulative period of more than 5 minutes in any hour;
- 4) The noise standard plus 15 dBA for a cumulative period of more than one minute in any hour; or
- 5) The noise standard plus 20 dBA for any period of time..

The City of Montclair exempts the noise generated from construction-related activities. The City of Montclair Municipal Code 6.12.060 exempts these activities from noise prohibitions provided they do not take place between the hours of 8:00 p.m. and 7:00 a.m. on any given day and provided that the Building Official determines that the public health and safety will not be impaired. Industrial or commercial construction or public improvements, not otherwise feasible except between these hours, may be approved on a limited, short-term basis, subject to the approval of the Director of Community Development.

**TABLE 8.14-2  
MAXIMUM NOISE LEVELS FROM CONSTRUCTION EQUIPMENT**

<b>Construction Equipment</b>	<b>Noise Level at 50 Feet (dBA, L<sub>max</sub>)</b>
Air Compressor	78
Auger Drill	84
Backhoe	78
Boom Lift Trucks	75
Concrete Saw	90
Crane	81
Dozer	82
Dump Truck	77
Excavator	81
Front End Loader	79
Generator	81
Grader	85
Paver	77
Plate Compactors	83
Roller	80
Welder	74

Source: FHWA, 2006.

The proposed project components would be located in residential, commercial, and industrial areas of the Cities of Pomona and Montclair. Noise-sensitive land uses lie adjacent to the proposed pipeline alignment, alternative proposed pump station locations and the proposed AWTF. As discussed previously, the nearest sensitive land uses to the project's construction areas would be the existing residential uses located less than 50 feet away along the pipeline alignment and adjacent to the AWTF. Given this distance, the project's construction activities could result in a temporary increase in the ambient noise levels at the nearest sensitive uses.

As previously mentioned, the City of Pomona Municipal Code indicates that the noise threshold is 65 dBA during normal business work hours (7 AM to 8 PM). There is a 5 dBA allowance for a cumulative period of 15 minutes in any hour but the conservative approach would be not to exceed 65 dBA. The proposed pipeline and pump station are located within City of Pomona limits so the construction of these components must not exceed this threshold. Pipe installation construction equipment would include backhoes, excavators, boom lift trucks, welders, steam rollers, and plate compactors. Of this

equipment, the loudest noise levels would be generated from the use of plate compactors. Based on Table 8.14-2, plate compactors can generate maximum noise levels of 83 dBA at 50 feet which would result in exceedances of allowable noise standards in the City of Pomona for sensitive noise receptors (residential areas). This noise exceedance would also increase the temporary ambient noise of the project vicinity. Therefore, Mitigation Measure NOI-1 and NOI-2 would be implemented to reduce these impacts to a less than significant level.

Construction activities of the proposed AWTF and eastern portions of the pipeline would be subject to City of Montclair limits. Since the City of Montclair exempts noise generated from construction-activities as long as it is performed during the daytime, the construction noise would not exceed the noise standard and would be considered less than significant.

### ***Mitigation Measures***

**NOI-1:** IEUA shall require its construction contractor to implement the following measures during construction, as needed:

- Include design measures necessary to reduce the construction noise levels to surrounding residential properties and sensitive receptors. These measures may include noise barriers, curtains, or shields.
- Locate stationary construction noise sources and place noise-generating construction activities (e.g. operation of compressors and generator, or general truck idling) as far from adjacent noise-sensitive receptors as possible.
- If construction is to occur near a school, the construction contractor shall coordinate with school administration in order to limit disturbance to the campus. Efforts to limit construction activities to non-school days shall be encouraged.
- For construction occurring adjacent to noise-sensitive land uses, identify a liaison for sensitive receptors, such as residents and property owners, to contact with concerns regarding construction noise and vibration. The liaison's telephone number(s) shall be prominently displayed at construction locations.
- For project components located adjacent to noise-sensitive land uses, notify in writing all landowners and occupants of properties adjacent to the construction area of the anticipated construction schedule at least 2 weeks prior to groundbreaking, when feasible.
- Restrict construction activities to between the hours of 7:00AM and 8:00PM in residentially-zoned areas within the City of Pomona.

**NOI-2:** Haul routes shall be restricted to arterial roads and shall not be designated through residential areas or near schools, whenever feasible.

### ***Operational Noise***

As discussed previously, the project would consist of the operation of a pump station, AWTF, and recycled water pipeline. The majority of aboveground facilities' mechanical and electrical components would be housed indoors. In addition, the recycled water pipeline would be located underground. Once construction activities have been completed, the newly installed facilities and recycled water pipeline would operate in enclosed facilities or underground which will limit audible noise levels affecting land uses located along the proposed pipeline alignment would occur during project operations. However, it is possible for a pump station or the AWTF to generate noise levels that could exceed nighttime thresholds at the nearest sensitive noise receptor. The following mitigation measure will be implemented.

**NOI-3:** Where permanent noise sources generate noise that exceeds 50 dBA at the nearest sensitive noise receptor, additional noise attenuation components (walls, insulation, etc.) shall be installed to ensure that noise does not exceed this 50 dBA noise threshold at the exterior wall of the receptor.

- b) **Less than Significant.** Vibration can be interpreted as energy transmitted in waves through the ground or man-made structures. These energy waves generally dissipate rapidly with distance from the vibration source. Because energy is lost during the transfer of energy from one particle to another, vibration becomes less perceptible with increasing distance from the source.

As described in the Federal Transit Administration's (FTA) Transit Noise and Vibration Impact Assessment (FTA, 2006), ground-borne vibration can be a serious concern for nearby neighbors of a transit system route or maintenance facility, causing buildings to shake and rumbling sounds to be heard. In contrast to airborne noise, ground-borne vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of ground-borne vibration are trains, buses on rough roads, and construction activities such as blasting, pile-driving, and operation of heavy earth-moving equipment.

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings. The root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on the human body. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (VdB) is commonly used to measure RMS. The relationship of PPV to RMS velocity is expressed in terms of the "crest factor," defined as the ratio of the PPV amplitude to the RMS amplitude. Peak particle velocity is typically a factor of 1.7 to 6 times greater than RMS vibration velocity (FTA, 2006). The

decibel notation acts to compress the range of numbers required to describe vibration. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receptors for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration sensitive equipment.

The effects of ground-borne vibration include movement of the building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. In extreme cases, the vibration can cause damage to buildings. Building damage is not a factor for most projects, with the occasional exception of blasting and pile-driving during construction. Annoyance from vibration often occurs when the vibration levels exceed the threshold of perception by only a small margin. A vibration level that causes annoyance would be well below the damage threshold for normal buildings. The FTA measure of the threshold of architectural damage for non-engineered timber and masonry buildings is 0.2 inches per second (in/sec) PPV (FTA, 2006).

With regards to the proposed project, groundborne vibration would be generated from the operation of heavy construction equipment, such as shoring equipment, at the open-trench and jack and bore sites along the proposed pipeline alignment, which could potentially affect the existing sensitive land uses located along the alignment. The proposed project, which consists of the installation of water conveyance infrastructure and a treatment facility, would not include any operational sources of groundborne vibration.

### **Construction**

The state *CEQA Guidelines* do not define the levels at which groundborne vibration or groundborne noises are considered “excessive.” Numerous public and private organizations and governing bodies have provided guidelines to assist in the analysis of vibration; however, the federal, state, and local governments have yet to establish specific vibration requirements. Additionally, there are no federal, state, or local vibration regulations or guidelines directly applicable to the proposed project. However, publications of the FTA and California Department of Transportation (Caltrans) are two of the seminal works for the analysis of vibration relating to transportation and construction-induced vibration. The proposed project is not subject to FTA or Caltrans regulations; nonetheless, these guidelines serve as a useful tool to evaluate vibration impacts.

For the purpose of this analysis, the vibration criteria for structural damage and human annoyance established in the most recent Caltrans’ *Transportation and Construction Vibration Guidance Manual* (2013), which are shown in **Table 8.14-3** and **Table 8.14-4**, respectively, are used to evaluate the potential vibration impacts of the project on nearby sensitive receptors.

The project’s construction activities along the proposed pipeline alignment have the potential to generate low levels of groundborne vibration as the operation of heavy



construction equipment (i.e., backhoes, excavators, trucks, etc.) generates vibrations that propagate through the ground and diminishes in intensity with distance from the source. Site ground vibrations from construction activities very rarely reach the levels that can damage structures, but they may be perceived in buildings very close to a construction site. No pile-driving or blasting activities would be required for construction of the proposed project components, although shoring equipment may be used.

**TABLE 8.14-3  
CALTRANS VIBRATION DAMAGE POTENTIAL THRESHOLD CRITERIA**

Structure and Condition	Maximum PPV (In/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

NOTE: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

SOURCE: Caltrans, 2013.

**TABLE 8.14-4  
CALTRANS VIBRATION ANNOYANCE POTENTIAL CRITERIA**

Structure and Condition	Maximum PPV (In/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.9	0.10
Severe	2.0	0.4

NOTE: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

SOURCE: Caltrans, 2013.

The various PPV vibration velocities for several types of construction equipment, along with their corresponding RMS velocities (in VdB), that can generate perceptible vibration levels are identified in Table 8.14-4. Based on the information presented in Table 8.14-4,

vibration velocities could reach as high as approximately 0.089 in/sec PPV at 25 feet from the source activity, depending on the type of construction equipment in use. This corresponds to a RMS velocity level of 87 VdB at 25 feet from the source activity.

Although the off-road construction equipment used for the project would generally consist of excavators and backhoes that would be smaller in scale than a large bulldozer, the vibration levels for a large bulldozer (as shown in Table 8.14-5) are used to analyze the project's vibration-related impacts during construction for the purpose of conducting a conservative analysis.

**TABLE 8.14-5  
VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT**

Equipment	Approximate PPV (In/sec)	Approximate RMS (VdB)
	25 Feet	25 Feet
Large Bulldozer	0.089	87
Caisson Drilling	0.089	87
Loaded Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

Source: FTA 2006.

The nearest sensitive land uses to the proposed booster pump station and AWTF construction areas would be the existing residential uses located approximately 20 feet to the north of Alternative 1, southeast of Alternative 2, and south of the AWTF. Table 8.14-6 shows the estimated construction-related groundborne vibration levels that could occur at the identified off-site sensitive uses located near the proposed project during project construction. As shown in Table 8.14-6, the vibration velocities forecasted to occur at the off-site sensitive receptors would be 0.124 in/sec PPV at the residences located nearest to the project site. None of the building structures at the identified off-site sensitive use locations are considered to be historic or fragile structures that are extremely susceptible to vibration damage. For the purpose of this analysis, the identified off-site residential structures are considered to be "older residential structures," based on the structure descriptions provided under Caltrans vibration criteria (refer to Table 8.14-3) and impact threshold is 0.3 in/sec PPV. A large dozer operated at 20 feet would not exceed 0.3 in/sec PPV. In addition to sensitive land uses, the groundborne vibration levels generated by the project's construction activities could also affect non-residential structures such as the industrial buildings located along the proposed pipeline alignments. However, as shown in Table 8.14-3, vibration levels would need to reach 0.5 in/sec before potential building damage to "modern industrial/commercial buildings"

would occur. In turn, based on the vibration levels generated by a large bulldozer, such equipment would need to operate within a distance of eight feet from a receptor structure before vibration levels would exceed 0.5 inches per second. As none of the project's proposed trenching sites or facilities would be located within eight feet of an existing industrial building/structure in the project area, groundborne vibration impacts on these non-sensitive uses would also not occur. Therefore, groundborne vibration impacts associated with building damage would be less than significant.

**TABLE 8.14-6  
GROUNDBORNE VIBRATION LEVELS AT OFF-SITE SENSITIVE USES**

<b>Off-site Sensitive Land Use</b>	<b>Approximate Distance to Construction Area (ft.)<sup>a</sup></b>	<b>Estimated PPV (in/sec)</b>
Residences	20 feet	0.124

ft. = feet  
in/sec = inches per second.

<sup>a</sup> For the groundborne vibration analysis, approximate distances are measured from the nearest project site boundary to the nearest sensitive-receptor structure located offsite.

However, according to Table 8.14-4, the groundborne vibration levels generated from the project's construction activities would produce 0.124 in/sec, which is perceptible at the nearest off-site sensitive receptors. Thus, implementation of Mitigation Measures NOI-1 and NOI-2 would reduce impacts to a less than significant level.

***Mitigation Measures***

**Implement Mitigation Measures NOI-1 and NOI-2**

***Operation***

Once construction activities have been completed, operation of the pipeline, booster pump station, and AWTF would not result in vibration related impacts. Therefore, no impact with respect to groundborne vibration during project operations would occur.

- c) **Less than Significant.** The proposed project, which consists of the installation of a recycled water pipeline underground, would not generate any noise levels that would be audible at land uses located aboveground along the pipeline alignment. The aboveground facilities, the pump station and AWTF, would both be housed so that the ambient noise levels would not significantly impact the project vicinity. As such, impacts related to permanent increases in ambient noise would be less than significant.
- e,f) **No Impact.** There are no private airports in the vicinity of the proposed project. The proposed pipeline along West Orange Grove Avenue and the proposed pump station sites are located with the Bracket Field Airport Influence Area. However, the project consists of water conveyance infrastructure and would not increase the amount of

people living or working in the area, and would therefore not expose people residing or working in the area to excessive noise levels.

## **References**

California Department of Transportation (Caltrans). 2013. Transportation and Construction Vibration Guidance Manual. September.

City of Montclair, City of Montclair General Plan, 1999.

City of Pomona, City Codes, <http://www.ci.pomona.ca.us/index.php/government/city-hall/city-codes>, accessed on February 19, 2016.

Federal Highway Administration (FHWA), Roadway Construction Noise Model User's Guide. 2006.

Federal Transit Administration (FTA). 2006. Transit Noise and Vibration Impact Assessment. May.

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## 8.15 Population and Housing

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>13. POPULATION AND HOUSING — Would the project:</b>				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing units, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Environmental Justice — To maintain consistency with CEQA Plus Guidelines, would the project :</b>				
d) Significantly affect the health or environment of minority or low income populations disproportionately.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Discussion

- a) **Less than Significant.** A project can have direct and/or indirect growth inducement potential. Direct growth would result if a project involved construction of new housing. A project can have indirect growth inducement if it would establish substantial new permanent employment opportunities (e.g., commercial, industrial or governmental enterprises) or if it would involve a substantial construction effort with substantial short-term employment opportunities and indirectly stimulate the need for additional housing and services to support the new employment demand. A project would also have an indirect growth inducement effect if it would remove an obstacle to additional growth and development, such as removing a constraint on a required public service.

The proposed project involves the construction of new water supply infrastructure but does not include housing or commercial development that would directly affect the number of residents or employees in the project area. The proposed project would employ approximately ten workers during the construction of the pipeline, pump station, and AWTF. No permanent full-time employees would be required for operation of the proposed project pump station and AWTF, existing employees within the IEUA service area would visit the facilities as needed. The proposed project would become part of the overall IEUA treated water system and would not directly or indirectly contribute to the creation of additional housing or jobs within the project area. The proposed project would help meet, but not exceed, treated water demands of planned growth and thus would not be a growth-inducing activity. Therefore, the proposed project would not directly or indirectly induce population growth and impacts would be considered less than significant.

- b) **No Impact.** The proposed project does not include the construction or demolition of housing units. Therefore, the proposed project would not displace housing and no impact would occur.

- c) **No Impact.** The proposed project does not include the construction or demolition of housing units. Therefore, the proposed project would not displace people and no impact would occur.
- d) **Less than Significant.** The proposed project would be located within the following nine Census Tracts: 4023.01, 4023.03, 4024.02, 4024.06, 4026, 4027.05, 4027.06, 2.03, and 2.07. However, because the majority of the proposed project consists of underground an pipeline that would be located within rights-of-way (ROWs), only three of the census tracts (4023.03, 4024.06, and 2.03) which would contain aboveground facilities for the proposed project were further analyzed. Specifically, the proposed AWTF would be located within Census Tract 2.03 and the proposed booster pump station would be located within either Census Tract 4023.03 or 4024.06. Table 8.15-1 below shows the population and demographics for each of the census tracts and their respective cities.

**TABLE 8.15-1  
POPULATION AND DEMOGRAPHICS DATA FOR THE PROPOSED PROJECT AREA**

	City of Pomona	Census Tract 4023.03	Census Tract 4024.06	City of Montclair	Census Tract 2.03
<b>Population</b>	151,142	4,676	4,508	37,685	4,486
<b>Demographics</b>					
Hispanic	69.4%	76.3%	82.3%	68.5%	61.9%
Black	7.1%	7.4%	8.0%	4.1%	3.0%
White	12.6%	12.3%	2.2%	15.5%	22.1%

Source: American Community Survey 2010-2014 5 –Year Estimates

According to the U.S. Census Bureau, 4,486 people reside in Census Tract 2.03, which includes a demographic of 61.9% Hispanic and 3% Black. Census Tract 2.03 has a lower proportion of minorities than the overall City of Montclair. While Census Tract 4023.03 and Census Tract 4024.06 have up to a 13% greater proportion of Hispanic residents relative to the City of Pomona, the proposed project component located on these tracts would be within a vacant, disturbed lot. Even though the construction of this project component would be near residential neighborhoods, construction would only cause temporary impacts and would not target the minority residential neighborhoods.

Table 8.15-2 shows the median household income and poverty level of the overall cities and tracts from the U.S. Census Bureau.

**TABLE 8.15-2  
MEDIAN HOUSEHOLD INCOME AND POVERTY LEVEL WITHIN PROPOSED PROJECT AREA**

	City of Pomona	Census Tract 4023.03	Census Tract 4024.06	City of Montclair	Census Tract 2.03
<b>Median Household Income</b>	\$48,993	\$35,362	\$49,861	\$48,767	\$59,086
<b>Individuals Below Poverty Level</b>	22.6%	36.5%	19.8%	19%	17%

Source: American Community Survey 2010-2014 5 –Year Estimates

The median household income of Census Tract 2.03 is \$59,086, which is approximately \$10,000 greater than the median household income level for the City of Montclair. Census Tract 4024.06 has a greater median household income of \$49,861 compared to the City of Pomona while Census Tract 4023.03 is about a \$10,000 lower at \$35,362. The poverty level for 2015 is considered to be at \$24,036 (total yearly income) for a family of four (U.S. Census Bureau, 2015). Thus, Census Tracts 2.03 and 4024.06 are well above the poverty threshold and have less individuals below the poverty level compared to their respective overall cities. Census Tract 4023.03 does have 36.5% of its individuals below poverty level but its median household income is well above the poverty threshold. Overall, Census Tracts 4023.03 and 4024.06 are not located in areas of low-income populations.

The proposed locations of the booster pump station and AWTF are based on proximity and connectivity to the proposed facilities it would service, as well as elevation for gravity based water delivery. Therefore, the locations of project aboveground facilities were not based on socio-economic characteristics of communities, such as income level or race/ethnicity. Based on the design criteria requirements of a water delivery system and the fact that the proposed project area covers a small portion of a low income and minority area, impacts associated with social justice impacts are considered to be less than significant.

## References

- U.S. Census Bureau, 2010-2014 American FactFinder, <http://factfinder.census.gov>, accessed on February 16, 2016.
- U.S. Census Bureau, Poverty Thresholds, <https://www.census.gov/hhes/www/poverty/data/threshld/>, 2015.

## 8.16 Public Services

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>14. PUBLIC SERVICES — Would the project:</b>				
a) Result in substantial adverse physical impacts associated with the provision of, or the 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 following public services:				
i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

a.i-v) **Less Than Significant Impact.** Construction of the proposed project would require approximately ten workers per day for the recycled water pipeline, ten workers per day for the pump station, and twenty workers per day for the AWTF. It is expected that most of these workers would commute to the project site from surrounding communities. Therefore substantial temporary increases in population that would adversely impact public services and require construction of new public facilities are not expected. A less than significant impact would occur.

Operation of the proposed project would result in increased delivery of recycled water for industrial uses such as landscape irrigation and groundwater replenishment. The proposed project would help meet, but not exceed, treated water demands of planned growth and thus would not be a growth-inducing activity (see Section 9.13 Population and Housing).

The project will not include the use or storage of highly flammable materials; the chemicals necessary for the wastewater treatment processes would not pose a significant long-term hazard to fire protection services. The project is a recycled water system expansion that could benefit fire protection services by helping to maintain and supplement the amount of water available to the IEUA system. The structures to be built as part of the project (AWTP, booster pump station, and pipeline) do not present a substantial fire hazard. They are made of block, steel, and concrete, which are considered fire-resistant. Thus, with no greater potential for fire risk, no new or altered fire protection facilities will be required to serve this Project. Any impact to the existing fire protection system is considered less than significant.



The proposed project is not the kind of use that would attract criminal activity, except for random trespass and theft; however, any random trespass is unlikely given that the AWTF site is enclosed by a fence, and it is anticipated that the booster pump station at either the alternative 1 or alternative 2 location will also be enclosed. The proposed project would not be readily accessible to the public as the project areas are or will be fenced, so a less than significant potential exists for demand for police protection or expansion of police protection. Due to the project's locations—within an existing IEUA facility, within a proposed IEUA managed facility, or within existing ROWs—and the lack of new people associated with the operation of the proposed facilities, implementation of the proposed project would not substantially increase the demand for law enforcement services beyond which already exists within the project footprint.

Thus, the proposed project would not require additional public services, such as fire protection, police protection, schools, or parks and thus would not require construction of new public facilities. No impact would occur.

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## 8.17 Recreation

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>15. RECREATION — Would the project:</b>				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

- a,b) **No Impact.** The proposed project would include construction of an AWTF, recycled water pipeline and a booster pump station. Recycled water would be utilized for industrial uses such as landscape irrigation and groundwater replenishment throughout IEUA's service area. The proposed project would not result, directly or indirectly, in an increase in population. Therefore, the proposed project would not result in an increase in the use of existing neighborhood and regional parks or other recreational facilities, and would not cause physical deterioration of facilities. The proposed project would not require the construction of additional recreational facilities. No impact would occur.

## 8.18 Transportation and Traffic

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>16. TRANSPORTATION AND TRAFFIC —</b>				
<b>Would the project:</b>				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location, that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

- a,b) **Less Than Significant with Mitigation.** Applicable transportation plans and policies include the San Bernardino County Associated Governments (SANBAG) Congestion Management Program (CMP), the Los Angeles County CMP, and the Southern California Association of Government's (SCAG) Regional Transportation Plan (SCAG, 2012).

The proposed project would not introduce any new facilities to the project area that would generate long-term changes in traffic. A total of approximately 46 delivery trips per year would be required to maintain the AWTF. This would add a negligible 4 delivery trucks a month to the circulation system. There would be no long-term impacts to level of service standards or performance of the circulation system. Potential traffic and transportation effects would be primarily limited to the construction phase of the proposed project. Construction-generated traffic would be temporary and therefore would not result in any long-term degradation in operating conditions or conflict with local and state plans or policies. The SANBAG and Los Angeles County CMP goals and policies pertain to long-term land use and transportation planning. Standards for roadways that are part of the CMP network are intended to regulate long-term traffic increases resulting from the operation of new development, and do not apply to

temporary construction projects. As project construction activities would last for approximately 18 months, long-term transportation policies and plans would not be impacted.

The performance of the circulation system may be affected on a short-term temporary basis during construction of the proposed project. The delivery of materials and equipment and hauling of excavated soils and demolition materials would result in intermittent lessening of roadway capacities due to slower movements and larger turning radii of the trucks compared to passenger vehicles. Construction equipment used for the proposed project would include concrete trucks, back-hoes, excavators, water trucks, paving equipment, and periodic delivery of pipes and materials. Construction would include the transportation of oversize loads, such as trucks carrying pipes and exporting demolition materials from the project site to the nearest landfill.

During construction of the proposed project, short-term temporary impacts to local circulation system performance would be associated with installation of the proposed pipeline within the roadway and right-of-way, which may require partial lane or roadway closures. This would reduce travel lanes and traffic flow, and also could affect alternative transportation routes. The proposed alignment would follow within and/or across several roadway right-of-ways as described below.

Within the City of Pomona, the following roadways would be utilized during the construction of the proposed project, as designated by the City of Pomona General Plan:

**Erie Street** is considered a local street that runs north-south. The proposed recycled water pipeline would be constructed within Erie Street from south of the intersection with West Holt Avenue to the intersection with West Orange Grove Avenue. The proposed pump station Alternative 1 would be located along Erie Street.

**West Orange Grove Avenue** is considered a minor arterial that runs northeast-southwest. The proposed recycled water pipeline would be constructed within West Orange Grove Avenue, between the intersections of Erie Street and East McKinley Avenue. The proposed pump station Alternative 2 would be located adjacent to the intersection of West Orange Grove Avenue and East McKinley Avenue.

**East McKinley Avenue** is considered a collector road that runs northwest-southeast. The proposed pipeline would be constructed within East McKinley Avenue from the intersection of West Orange Grove Avenue to the intersection of North Towne Avenue.

**North Towne Avenue** is considered a major arterial that runs north-south. The proposed pipeline would be constructed within North Towne Avenue from the intersection of East McKinley Avenue to the intersection of Lincoln Avenue.

**Lincoln Avenue** is considered a collector road that runs east-west. The proposed pipeline would be constructed within Lincoln Avenue from the intersection of North Towne Avenue to the intersection of South Mills Avenue,

Within the City of Montclair, the following roadways would be utilized during the construction of the proposed project, as designated by the City of Montclair General Plan:

**Orchard Street** is designated as a secondary street that runs east-west. The proposed pipeline would be constructed within Orchard Street from the intersection of South Mills Avenue to the intersection of Ramona Avenue.

**Ramona Avenue** is designated as a major street that runs north-south. The proposed pipeline would be constructed within Ramona Avenue from the intersection of Orchard Street to Palo Verde Street. The AWTF would be constructed adjacent to Ramona Avenue.

**Palo Verde Street** is designated as a local street that runs east-west. The proposed pipeline would be constructed within Palo Verde Street from the intersection of Ramona Avenue to Helena Avenue.

Implementation of **Mitigation Measures TR-1** would reduce traffic impacts resulting from the construction of the proposed project to less than significant levels, by requiring the construction contractor and IEUA to identify future potential traffic impacts and implement a Traffic Control Plan to reduce those impacts. The Traffic Control Plan would require plans for signage and detours, limitations on lane closures during peak traffic hours, and coordination with transit agencies to facilitate relocation of routes or bus stops. Impacts would be less than significant with implementation of Mitigation Measure TR-1.

### ***Mitigation Measures***

**TR-1:** IEUA shall require its construction contractor to prepare and implement a Traffic Control Plan to show specific methods for maintaining traffic flows.

Examples of traffic control measures to be considered include:

- 1) Develop circulation and detour plans to minimize impacts to local street circulation, including use of signing and flagging to guide vehicles through and/or around the construction zone.
- 2) Schedule truck trips outside of peak morning (7:00 a.m. to 9:00 a.m.) and evening (4:00 p.m. to 6:00 p.m.) commute hours.
- 3) Limit lane closures during peak hours to the extent possible.
- 4) Use haul routes minimizing truck traffic on local roadways to the extent possible.

- 5) **Include accommodations for bicycles and pedestrians in all areas potentially affected by project construction, including detours and signage to maintain connectivity for bikeways and trails.**
  - 6) **Store construction materials only in designated areas.**
  - 7) **Coordinate signage for temporarily eliminated on-street parking, with instructions including timing and duration, and nearby areas where parking is currently available.**
  - 8) **Coordinate with local transit agencies for temporary relocation of routes or bus stops in works zones, as necessary.**
  - 9) **Develop comprehensive strategies for maintaining emergency flows. Strategies shall include, but are not limited to, maintaining steel trench plates at the construction sites 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.**
- c) **Less Than Significant.** Construction and operation of the proposed project would not affect air traffic patterns, levels, or locations. Portions of the proposed project including the recycled pipeline along West Orange Grove Avenue and the proposed pump station sites are located within the Airplane Influence Area for the Brackett Field Airport. However, the proposed project components would be compatible with the permitted land uses identified in the ALUCP (Los Angeles County Airport Land Use Commission, 2015). Refer to section 9.10 Land Use and Land Use Planning, for additional discussion of project impacts associated with airport land use compatibility plans. Less than significant impacts would occur.
- d) **Less Than Significant with Mitigation.** The proposed project would not permanently modify any roadway designs or introduce incompatible vehicles. Any disturbance to roadways during pipeline construction would be restored to pre-project conditions. The presence of construction vehicles, equipment and open trenches would temporarily introduce potential safety hazards to motorists, cyclists, and pedestrians during pipeline construction. Implementation of **Mitigation Measure TR-1** would minimize potential hazards to less than significant levels.

### ***Mitigation Measures***

#### **Implementation of Mitigation Measure TR-1**

- e) **Less Than Significant with Mitigation.** The proposed project would require partial road closures during construction of pipeline within roadways. Partial closures impact traffic flow and could result in inadequate emergency access. However, implementation of **Mitigation Measure TR-1** would require preparation of a Traffic Control Plan, which

would include measures to maintain emergency flow. Adherence to this mitigation measure would reduce any potential impacts regarding emergency service access to less than significant levels.

***Mitigation Measures***

**Implementation of Mitigation Measure TR-1**

- f) **Less Than Significant with Mitigation.** The proposed project, once constructed, would return roadways to pre-project conditions and would have no long-term impact on demand for alternative transportation or on alternative transportation facilities (i.e., for transit and bicyclists). Construction of the proposed pipeline and AWTF could slightly disrupt alternate forms of transportation due to the proposed pipeline construction and partial lane closures. Implementation of Mitigation Measure TR-1 would require preparation of the Traffic Control Plan, which would include measures to maintain alternative transportation and transit routes. Implementation of Mitigation Measure TR-1 would ensure that impacts associated with temporary disruptions to public transit, bicycle, or pedestrian facilities would be mitigated to a less than significant level.

***Mitigation Measures***

**Implementation of Mitigation Measure TR-1**

**References**

City of Montclair, City of Montclair General Plan: Recommended General Plan Circulation Element Roadway Classifications Map, 1999.

City of Pomona, Active Transportation Plan: Bicycle Master Plan and Pedestrian Master Plan, November 2012.

City of Pomona, City of Pomona 2014 General Plan Update, adopted March 2014.

Los Angeles County Airport Land Use Commission, Brackett Field Airport Land Use Compatibility Plan, December 9, 2015.

San Bernardino County Land Use Plan, 2010. *General Plan Circulation and Transportation Map.*

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## 8.19 Utilities, Service Systems and Energy

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>17. UTILITIES AND SERVICE SYSTEMS —</b>				
<b>Would the project:</b>				
a) Conflict with wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider that would serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Energy</b>				
h) Result in a substantial increase in overall or per capita energy consumption?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Result in wasteful or unnecessary consumption of energy?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Require or result in the construction of new sources of energy supplies or additional energy infrastructure capacity the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
k) Conflict with applicable energy efficiency policies or standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Discussion

- a) **Less than Significant.** The proposed project would extend the existing recycled water distribution system for IEUA. The proposed distribution pipeline would redirect flow from the City of Pomona's existing recycled water pipeline into an AWTF operated by IEUA and discharge into the existing Montclair Basin. The proposed pipeline would convey recycled water that comes from the Pomona WRP to the Montclair Basin for ground-water replenishment and some water may be used for landscape irrigation. Recycled water use associated with the proposed project would comply with the California Department of Public Health recycled water regulations contained in Title 22 of the California Code of Regulations. In addition, the proposed project would be subject to



conditions imposed by the Santa Ana RWQCB pursuant to Water Recycling Requirements (WRRs). The WRRs would cover the proposed end uses. The proposed project would not conflict with any wastewater treatment regulations. Impacts would be considered less than significant

- b) **Less than Significant.** The proposed project would construct a new recycled water treatment facility. Wastewater generated during construction of the proposed project would be minimal, consisting of portable toilet waste generated by construction workers. The proposed project involves the operation of the AWTF, which is a recycled water treatment facility; the project's impacts to various aspects of the environment are discussed throughout the sections of Chapter 9. All wastewater generated at the proposed AWTF would be treated and/or disposed of by the IEUA. The proposed pipeline and proposed booster pump station would not generate wastewater during their operation. Therefore, the proposed project would not cause significant environmental effects due to the expansion or construction of a new wastewater treatment facility, and impacts would be less than significant.
- c) **Less Than Significant with Mitigation.** As discussed within Section 9.9 (e), construction of the proposed project would temporarily alter flow at the project site due to ground disturbing activities. However, with implementation of **Mitigation Measure GEO-1**, BMPs would minimize the potential for flooding on- and off-site, reducing water flow to stormwater drainage systems. Therefore, construction of the proposed project would not require construction of new stormwater facilities.

Once construction is complete, the proposed pipeline route would be returned to pre-construction conditions and would not increase the amount of impervious surfaces. Thus, the proposed pipeline would not increase surface runoff and would not require additional stormwater facilities. However, the construction of the pump station and AWTF may result in a net increase in impervious surfaces, as pump station locations Alternative 1 and Alternative 2 are undeveloped parcels, and the AWTF location is within an existing plant treatment site. However, implementation of Mitigation Measure GEO-2 would require implementations of operational BMPs, reducing flow to stormwater drainage systems. Therefore, with implementation of Mitigation Measure GEO-2, the proposed project would not require the construction of new storm water drainage facilities, and impacts would be less than significant with mitigation.

### ***Mitigation Measures***

#### **Implementation of Mitigation Measure GEO-2.**

- d) **Less than Significant.** Construction of the proposed project components would require minimal amounts of water for dust control, concrete mixing, and sanitary purposes. Operation of the proposed project would convey the existing recycled water supply from the Pomona WRP to the IEUA proposed recycled water pipeline, Montclair Basin, the proposed AWTF, and other end users within its service area. The proposed AWTF would be constructed with sufficient capacity to treat the recycled water. Operation of the

proposed project would require a minimal amount of water for on-site sanitation for workers. Construction and operational water uses would be negligible, and impacts to water supply from the proposed project would be less than significant.

- e) **No Impact.** The proposed project includes the distribution of recycled water, tertiary treatment of recycled water, and discharge into the Montclair Basin for groundwater recharge. The proposed project would not generate wastewater treatment demands. Therefore, no impact would occur.
- f) **Less than Significant.** The waste generated during construction of the proposed project would mainly consist of general construction debris, demolition material, building material wrapping and worker personal waste. Construction and demolition waste generated would require disposal at a nearby landfill. The project would prepare a construction and demolition solid waste management plan in accordance with Solid Waste Management Division (SWMD). The plan would demonstrate a minimum of 50 percent diversion of construction building materials and demolition debris from landfills through reuse or recycling. Information provided in this waste management plan would include how the waste would be managed, hauler identification, and anticipated material wastes. Construction waste would likely be disposed of at the Azusa Land Reclamation or Mid-Valley Landfill. The Azusa Land Reclamation (1211 W. Gladstone, Azusa CA 91702) is located approximately 12.7 miles northwest of the proposed project area, and the Mid Valley Sanitary Landfill (2390 Alder Avenue, Rialto, CA 92377) is located approximately 17 miles northeast of the proposed project. Both landfills would have sufficient capacity to accommodate the project's disposal needs. In addition, IEUA and the construction contractor would reuse or recycle wastes produced through the construction, demolition, and excavation activities as much as feasible. Therefore, impacts regarding sufficient landfill capacity would be considered less than significant.
- g) **Less than Significant.** The proposed project would comply with all federal, state, and local construction and demolition requirements during construction of the proposed structures. The cities in which the project would be located are required to comply with the California Integrated Waste Management Act of 1989, requiring diversion of solid waste from landfills through reuse and recycling. The project would be required to recycle during its operation. Project impacts related to potential noncompliance with solid waste statutes and regulations would be less than significant.
- h-k) **Less than Significant.** Some construction activities would require connections to existing power sources and would slightly increase short-term electricity demand onsite. However, the increase in energy demand would be temporary and would comply with all applicable federal, state, and local energy efficiency policies and standards. Furthermore, most construction activities, including excavation and grading, would be powered by diesel engines and not by electricity. Construction impacts on energy demand area considered to be less than significant.

The implementation of the proposed project, specifically the proposed pump station and AWTF, would slightly increase demands on local energy providers. Once constructed, the proposed project would involve recharge of the groundwater basin and conveyance of treated water to/from the proposed project. Thus, the potential impacts of these actions are based on the amount of energy required to convey recycled water to the recharge basins. The WasteReuse Research Foundation has estimated the energy intensity for various types of recycled water treatment, including MF, RO, and UV/advanced oxidation for use in groundwater recharge. It is estimated that the energy intensity for such advanced membrane treatment is 1,199 kilowatt hour (kWh) per acre feet (AF) (WRF, 2012). The energy intensity for a local supply of recycled water conveyance is estimated to vary between 28 and 107 kWh/AF (WRF, 2012). Thus, based on these assumptions, the total energy intensity for producing advanced treated recycled water and its conveyance is estimated to be approximately 2,100 kWh/AF.

No additional power generation facilities would be required, current energy providers have enough capacity to power the proposed project demands. Operational activities would comply with applicable energy efficiency policies and standards. IEUA would install energy-efficient equipment (e.g., pumps and motors) to the maximum extent practicable to minimize the proposed project's energy consumption. Furthermore, because the proposed project is intended to meet groundwater recharge quality standards, the associated energy requirements would not be a wasteful use of energy or conflict with local or state energy efficiency plans or policies.

In addition, the proposed project would help IEUA improve its local water supply by recharging the local groundwater basin. Even though adding the project components would increase energy consumption to power the pumps and AWTF, the proposed project could serve to reduce the need for imported water and the associated energy demands of transport.

The increased energy usage required to operate the proposed project would not represent a wasteful use of energy, require new energy sources, represent a considerable increase when compared on a per capita basis, or conflict with applicable energy policies and standards. Impact would be considered less than significant.

## **References**

California Energy Commission, 2005. *California's Water-Energy Relationship*. Prepared in support of the 2005 Integrated Energy Policy Report Proceeding (04-IEPR-01E). Final Staff Report, CEC -700-2005-011-SF, November 2005.

County of San Bernardino Public Works, *Construction & Demolition Waste Recycling Guide and Directory*, published June 2015.

WasteReuse Research Foundation (WRF), *Implications of Future Water Supply Sources for Energy Demands*, Project Number WRF 08-16, 2012.

## 8.20 Mandatory Findings of Significance

<u>Issues (and Supporting Information Sources):</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>18. MANDATORY FINDINGS OF SIGNIFICANCE —</b>				
<b>Would the project:</b>				
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

- a) **Less than Significant with Mitigation.** As discussed in Sections 9.4 of this Initial Study, construction of the proposed project has the potential to conflict with the City of Montclair Tree Policy. However, with implementation of Mitigation Measure BIO-1 would ensure that impacts to biological resources are mitigated to a less than significant level. The proposed project also has the potential to adversely affect cultural resources. Implementation of CUL-1 through CUL-8 would ensure any potential impacts are mitigated to a less than significant level. Once constructed, operation of the proposed project would have no long-term permanent impacts to biological or cultural resources.
- b) **Less than Significant with Mitigation.** In accordance with CEQA Guidelines Section 15183, the environmental analysis in this IS/MND was conducted to determine if there were any project-specific impacts as a result of the proposed project. No direct significant impacts were identified that could not be mitigated to a less than significant level. However, when combined with other projects in the region, the proposed project may result in a contribution to a potentially significant cumulative impact.

As discussed in Sections 9.1 through 9.17, the potential environmental impacts of the proposed project would occur during construction, with no lasting operational effects. Mitigation measures incorporated herein would mitigate most direct and indirect impacts, as well as potential contributions to cumulative impacts, associated with implementation of the proposed project. Because construction-related impacts of the proposed project would be temporary and localized, they would only have the potential to combine with similar impacts or other projects if they occur at the same time and in proximity to each other. To minimize the potential for cumulative impacts to traffic and other construction-

related effects, implementation of **Mitigation Measure CU-1** would require IEUA to consult with local jurisdictions, such as the City of Pomona and City of Montclair, as well as other state or regional agencies, such as Caltrans, to coordinate construction schedules and locations of other related projects in the vicinity, to minimize potential conflicts or compounding of effects, such as traffic congestions or circulation delays or increases in ambient noise levels. Therefore, impacts would be less than significant with mitigation.

***Mitigation Measures***

**CU-1:** The construction contractor shall consult with appropriate agencies and jurisdictions prior to initiating ground-disturbing activities, to determine if other construction projects would occur coincidentally at the same time and in the vicinity of the proposed project, depending on project schedule and pipeline segment installation. Coordination of construction activities for coincident projects shall occur to ensure impacts to traffic, circulation, access, and noise do not compound to be cumulatively significant. Adjustments to construction schedules and plans, such as traffic control plans, shall be made accordingly as necessary.

- c) **Less than Significant with Mitigation.** With implementation of mitigation measures included in this IS/MND, the proposed project would not result in substantial adverse effects to humans (geology, noise, etc.), either directly or indirectly.
-

## 8.21 Summary of Mitigation Measures

### Air Quality

- AIR-1 Using best available control measures during soil disturbance. The menu of enhanced dust control measures includes the following:
- Limit the disturbance "footprint" to as small an area as practical.
  - Water all active construction areas at least twice daily.
  - Cover all off-site haul trucks or maintain at least 2 feet of freeboard.
  - Pave or apply water four times daily to all unpaved parking or staging areas.
  - Sweep or wash any site access points within 30 minutes of any visible dirt deposition on any public roadway.
  - Cover or water twice daily any on-site stockpiles of debris, dirt or other dusty material.
  - Suspend all operations on any unpaved surface if winds exceed 25 mph.
- AIR-2 Limit allowable idling to 5 minutes for trucks and heavy equipment before shutting the equipment down.
- AIR-3 Utilize Tier 3 rated diesel engines for off-road construction equipment.

### Biological Resources

- BIO-1 Prior to removal of the four oak trees present within the proposed AWTF, IEUA shall consult with the City of Montclair to determine the appropriate location and number of trees to be planted within the facility according to the regulations outlined in the City of Montclair Tree Policy.

### Cultural Resources

- CUL-1 In the event that booster pump station alternative 2 is selected, IEUA shall retain a qualified architectural historian meeting the Secretary of the Interior's Professional Qualification Standards for architectural history to review and approve the preliminary and final project design plans to ensure that it conforms to the Secretary of the Interior's Standards.
- CUL-2 A qualified archeologist, defined as an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for archaeology (36 CFR Part 61), or an archaeologist working under the direction of a qualified archaeologist, shall conduct pre-construction cultural resources sensitivity training to inform construction personnel on the types of cultural resources that may be encountered, and to bring awareness to personnel of actions to be taken in the event of a cultural resources discovery. IEUA shall complete training for all construction personnel and retain documentation showing when training of personnel was completed.
- CUL-3 Archaeological monitoring shall be conducted for all initial ground-disturbing activities at the AWTF and booster pump station alternatives. If during initial observations of a fair sampling of the area, the monitor determines the area lacks archaeological potential due to evidence of past disturbances, monitoring may be discontinued after consultation with the qualified archaeologist. If it appears that the area appears undisturbed and there is a potential for intact subsurface resources, then full-time monitoring shall be implemented to a depth of 5 feet (anticipated depth of older Quaternary deposits). Monitoring may be discounted at depths above 5 feet if older Quaternary deposits are encountered. Archaeological monitoring shall be conducted by a monitor familiar with the types of archaeological resources that could be encountered within the project area, and under the direct supervision of the qualified archaeologist. The monitor shall observe all ground-disturbing activities, including but not limited to, brush clearance, grubbing, demolition and concrete removal, and grading and

excavation and shall be empowered to halt or redirect ground-disturbing activities away from the vicinity of a discovery until the qualified archaeologist has evaluated the discovery and determined appropriate treatment (as prescribed in Mitigation Measure CUL-4). The monitor shall keep daily logs detailing the types of activities and soils observed, and any discoveries. After monitoring has been completed, the qualified archaeologist shall prepare a monitoring report that details the results of monitoring. The report shall be submitted to the IEUA, SCCIC, and any Native American groups who request a copy.

**CUL-4** In the event of the discovery of archaeological materials, IEUA shall immediately cease all work activities in the area (within approximately 50 feet) of the discovery until it can be evaluated by the qualified archaeologist. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or tool-making debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-period materials might include stone or concrete footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. Construction shall not resume until the qualified archaeologist has conferred with the IEUA on the significance of the resource.

If it is determined that the discovered archaeological resource constitutes a historical or unique archaeological resource under CEQA, avoidance and preservation in place is the preferred manner of mitigation. Preservation in place maintains the important relationship between artifacts and their archaeological context and also serves to avoid conflict with traditional and religious values of groups who may ascribe meaning to the resource. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, a Cultural Resources Treatment Plan shall be prepared and implemented by a qualified archaeologist in consultation with the IEUA that provides for the adequate recovery of the scientifically consequential information contained in the archaeological resource. The IEUA shall consult with appropriate Native American representatives in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond that which is scientifically important, are considered.

**CUL 5** Prior to earthmoving activities, a Qualified Paleontologist (QP) meeting the Society of Vertebrate Paleontology (SVP) standards (SVP, 2010) shall be retained. The QP shall contribute to any construction worker cultural resources sensitivity training either in person or via a training module provided to the qualified archaeologist. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the project site and the procedures to be followed if they are found. The QP shall also oversee the paleontological monitoring (as prescribed in CUL-6) and shall be available to ascertain the significance of any paleontological resources recovered during project excavations (as prescribed in CUL-7). The QP shall also conduct periodic spot-checks of exposed sediments to assist the qualified paleontological monitor in determining the age/sensitivity of exposed sediments and/or paleontological resources encountered during project excavations.

**CUL-6** Prior to earthmoving activities, a qualified paleontological monitor meeting the Society of Vertebrate Paleontology (SVP) standards (SVP, 2010) shall be retained. The qualified paleontological monitor shall monitor all excavations into native sediments below 5 feet in depth and have the authority to temporarily halt or divert work away from exposed fossils in order to recover the fossil specimens safely and quickly. The qualified paleontological monitor shall complete daily monitoring logs outlining the day's activities. Paleontological monitoring may be increased or decreased if fossils are discovered above 5 feet or if the QP determines that based on subsurface sediments the potential for encountering significant paleontological resources is low.

- CUL-7** If paleontological resources are encountered during ground-disturbing activities, all work within 100 feet of the find shall halt until the find can be evaluated by the QP and appropriate measures taken to salvage the specimens if they are determined to be potentially significant. If sediments are encountered that are deemed appropriate for the recovery of microvertebrate specimens, the QP shall direct the paleontological monitor to collect a test sample (approximately 600 pounds per SVP standards or an amount determined by the QP) to screen for microvertebrates either on or off site. The QP, based on observations of subsurface soil stratigraphy or other factors, may reduce or discontinue monitoring as warranted if he or she determines that the possibility of encountering fossiliferous deposits is low. The QP shall prepare a final monitoring report to be submitted to the IEUA and filed with the local repository along with any fossils and associated data recovered during construction.
- CUL-8** If human remains are encountered, the contractor shall halt work in the vicinity (within 100 feet) of the find and contact the San Bernardino County Coroner in accordance with Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5. If the County Coroner determines that the remains are Native American, the NAHC will be notified in accordance with Health and Safety Code Section 7050.5, subdivision (c), and Public Resources Code Section 5097.98 (as amended by AB 2641). The NAHC will designate a Most Likely Descendant (MLD) for the remains per Public Resources Code Section 5097.98. Until the landowner has conferred with the MLD, the IEUA shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity, is adequately protected according to generally accepted cultural or archaeological standards or practices, and that further activities take into account the possibility of multiple burials.
- CUL-9** During ground disturbing activities (including but not limited to pavement removal, pot-holing or auguring, boring, grading, excavation and trenching) at least one Native American Monitor will be present at the project site. The Native American Monitor will compile monitoring logs on a daily basis. The logs will provide descriptions of the daily activities, including construction activities, locations, soil characteristics and any cultural materials identified. The Monitor shall photo-document the ground disturbing activities. If any cultural materials are identified, the Monitor shall have the authority to redirect construction activities until the extent and importance of the materials are assessed. Subsequent management of any Native American cultural materials shall be determined through consultation between IEUA and the Native American Band supplying the monitor. Any human remains encountered shall be handled through the County Coroner's office and, if necessary, in conjunction with Native American Heritage Commission and Native American Band.

### **Geology, Soils and Seismicity**

- GEO-1** In accordance with the National Pollution Discharge Elimination System (NPDES) Construction General Permit, IEUA shall prepare a project specific Stormwater Pollution Prevention Plan (SWPPP) to minimize soil erosion. The SWPPP shall prescribe temporary Best Management Practices (BMPs), such as, but not limited to, sediment barriers and traps, silt basins, and silt fences. In addition, BMPs to permanently stabilize the pipeline alignment and new structural sites shall be installed prior to completing final construction activities. This shall include onsite detention or percolation sufficient to offset a substantial increase in the downstream volume of runoff in the drainage area.

### **Noise**

- NOI-1** IEUA shall require its construction contractor to implement the following measures during construction, as needed:
- Include design measures necessary to reduce the construction noise levels to surrounding residential properties and sensitive receptors. These measures may include noise barriers, curtains, or shields.



- Locate stationary construction noise sources and place noise-generating construction activities (e.g. operation of compressors and generator, or general truck idling) as far from adjacent noise-sensitive receptors as possible.
- If construction is to occur near a school, the construction contractor shall coordinate with school administration in order to limit disturbance to the campus. Efforts to limit construction activities to non-school days shall be encouraged.
- For construction occurring adjacent to noise-sensitive land uses, identify a liaison for sensitive receptors, such as residents and property owners, to contact with concerns regarding construction noise and vibration. The liaison's telephone number(s) shall be prominently displayed at construction locations.
- For project components located adjacent to noise-sensitive land uses, notify in writing all landowners and occupants of properties adjacent to the construction area of the anticipated construction schedule at least 2 weeks prior to groundbreaking, when feasible.
- Restrict construction activities to between the hours of 7:00AM and 8:00PM in residentially-zoned areas within the City of Pomona.

NOI-2 Haul routes shall be restricted to arterial roads and shall not be designated through residential areas or near schools, whenever feasible.

NOI-3 Where permanent noise sources generate noise that exceeds 50 dBA at the nearest sensitive noise receptor, additional noise attenuation components (walls, insulation, etc.) shall be installed to ensure that noise does not exceed this 50 dBA noise threshold at the exterior wall of the receptor.

### **Transportation and Traffic**

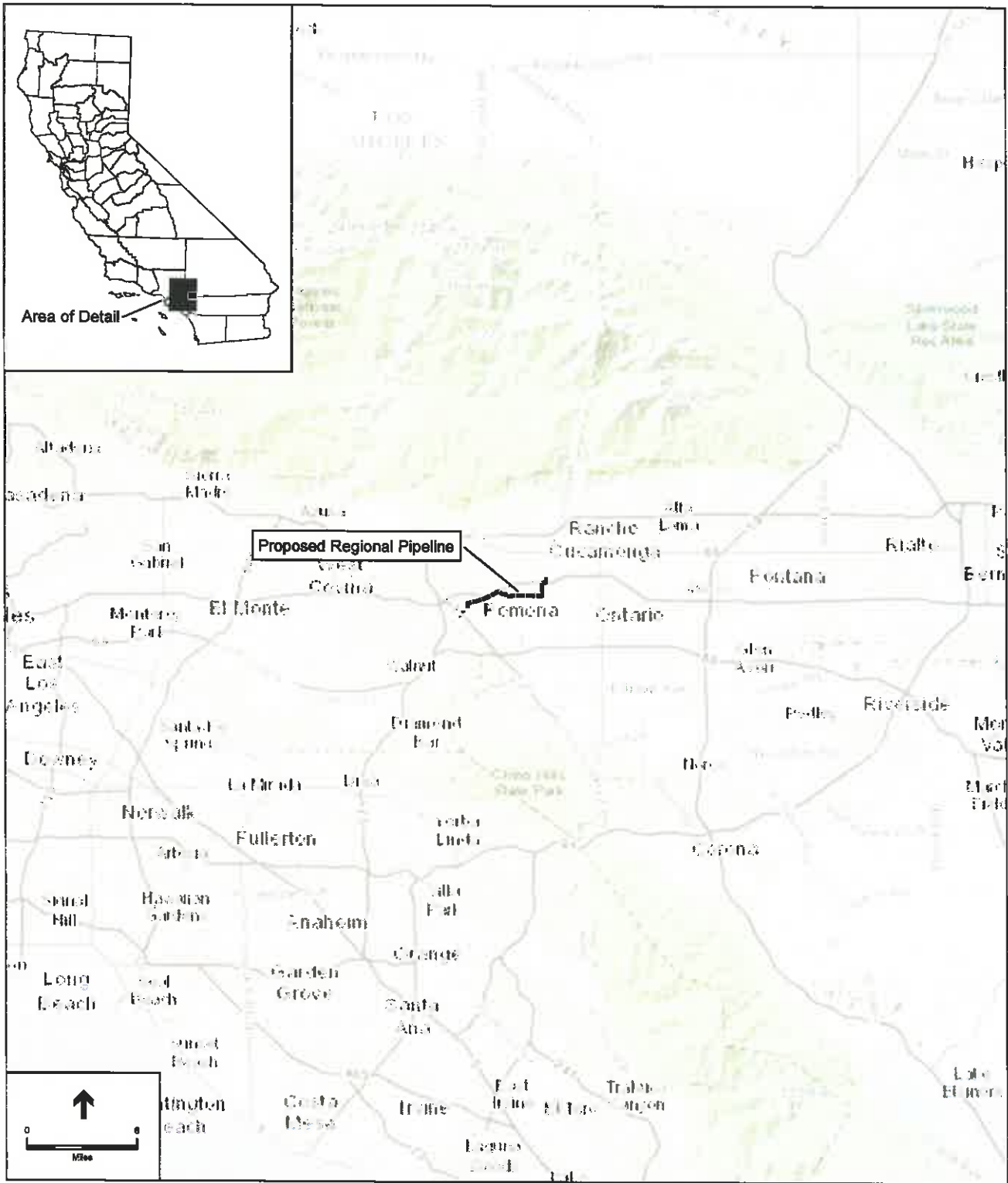
TR-1 IEUA shall require its construction contractor to prepare and implement a Traffic Control Plan to show specific methods for maintaining traffic flows. Examples of traffic control measures to be considered include:

- 1) Develop circulation and detour plans to minimize impacts to local street circulation, including use of signing and flagging to guide vehicles through and/or around the construction zone.
- 2) Schedule truck trips outside of peak morning (7:00 a.m. to 9:00 a.m.) and evening (4:00 p.m. to 6:00 p.m.) commute hours.
- 3) Limit lane closures during peak hours to the extent possible.
- 4) Use haul routes minimizing truck traffic on local roadways to the extent possible.
- 5) Include accommodations for bicycles and pedestrians in all areas potentially affected by project construction, including detours and signage to maintain connectivity for bikeways and trails.
- 6) Store construction materials only in designated areas.
- 7) Coordinate signage for temporarily eliminated on-street parking, with instructions including timing and duration, and nearby areas where parking is currently available.
- 8) Coordinate with local transit agencies for temporary relocation of routes or bus stops in works zones, as necessary.
- 9) Develop comprehensive strategies for maintaining emergency flows. Strategies shall include, but are not limited to, maintaining steel trench plates at the construction sites 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.

**Mandatory Findings of Significance**

- CU-1     **The construction contractor shall consult with appropriate agencies and jurisdictions prior to initiating ground-disturbing activities, to determine if other construction projects would occur coincidentally at the same time and in the vicinity of the proposed project, depending on project schedule and pipeline segment installation. Coordination of construction activities for coincident projects shall occur to ensure impacts to traffic, circulation, access, and noise do not compound to be cumulatively significant. Adjustments to construction schedules and plans, such as traffic control plans, shall be made accordingly as necessary.**

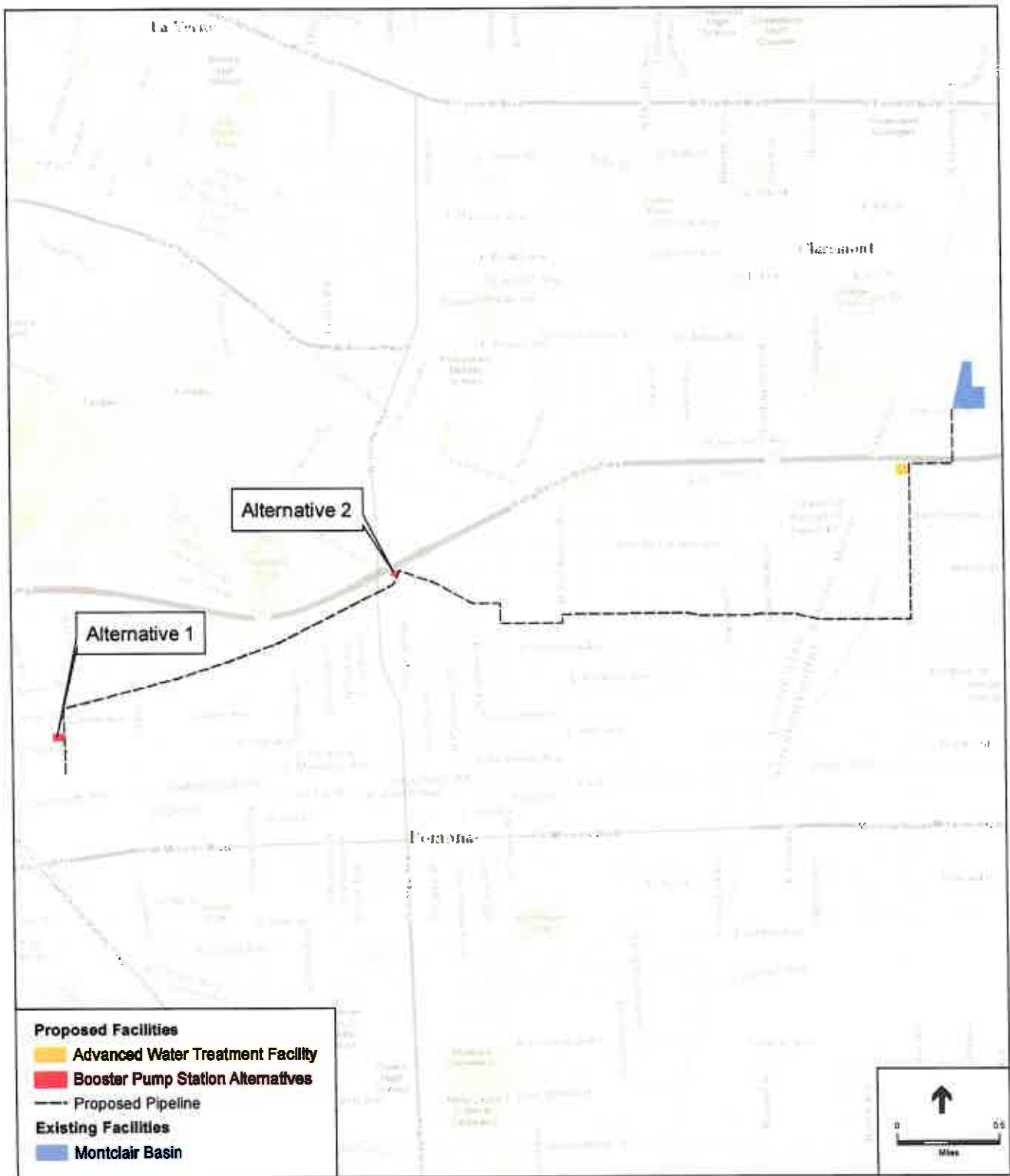
## **FIGURES**



SOURCE: ESRI, USGS, IEUA 2016

IEUA Pomona Interline Project . 150283.02

**Figure 1**  
Proposed Project Location



SOURCE: ESRI, USGS, IEUA 2015

IEUA Pomona Intertie Project . 150283.02

**Figure 2**  
Proposed Project



SOURCE: ESRI, IEUA 2015

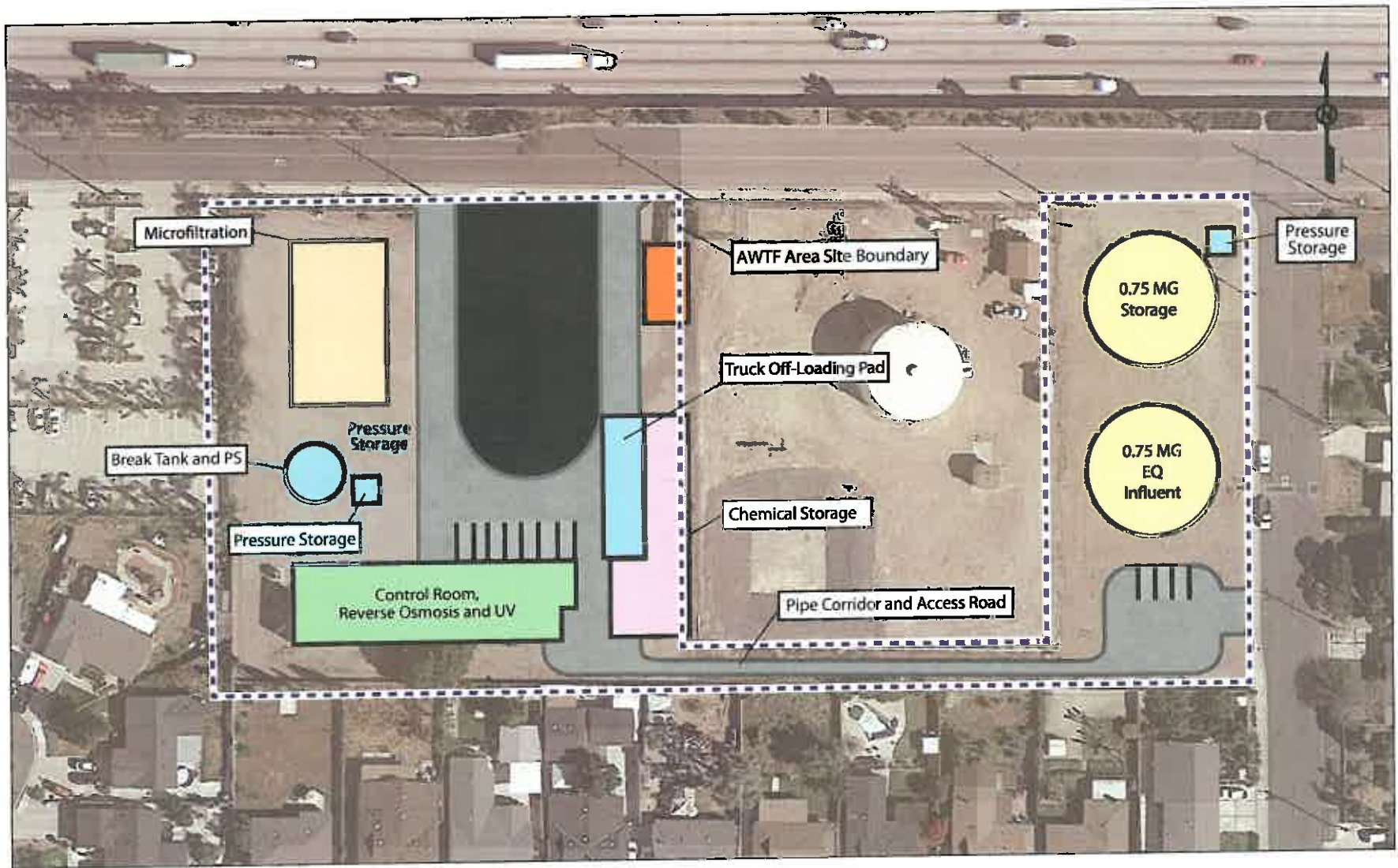
IEUA Pomona Intertie Project . 150283.02  
Figure 3A  
Proposed Pump Station Location 1





SOURCE: ESRI, IEUA 2016

IEUA Pomona Intertie Project . 150283.02  
**Figure 3B**  
**Proposed Pump Station Location 2**

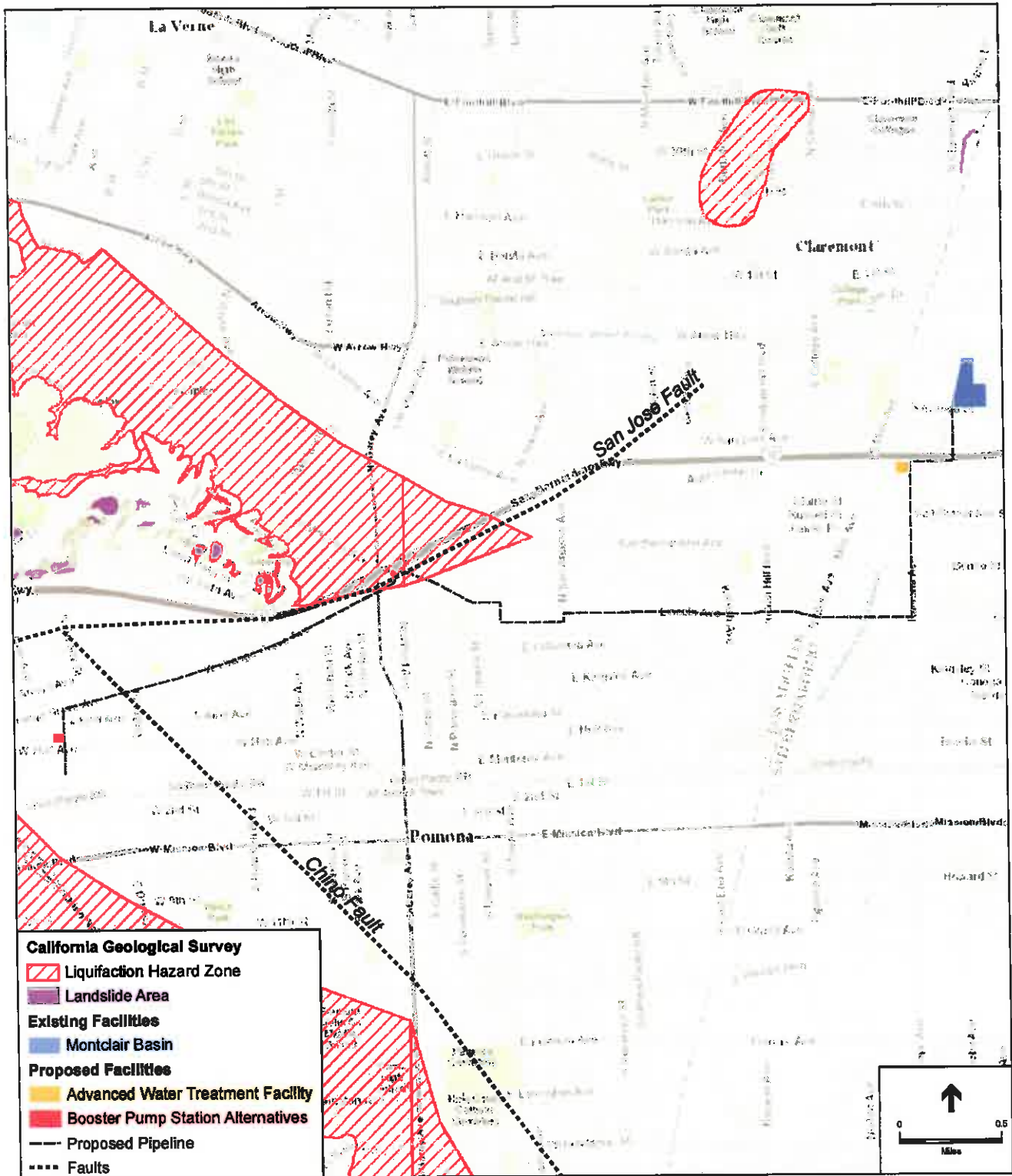


SOURCE: Carollo Engineers

IEUA Pomona Intertie Project . 150283.02

**Figure 4**  
AWTF Conceptual Plan

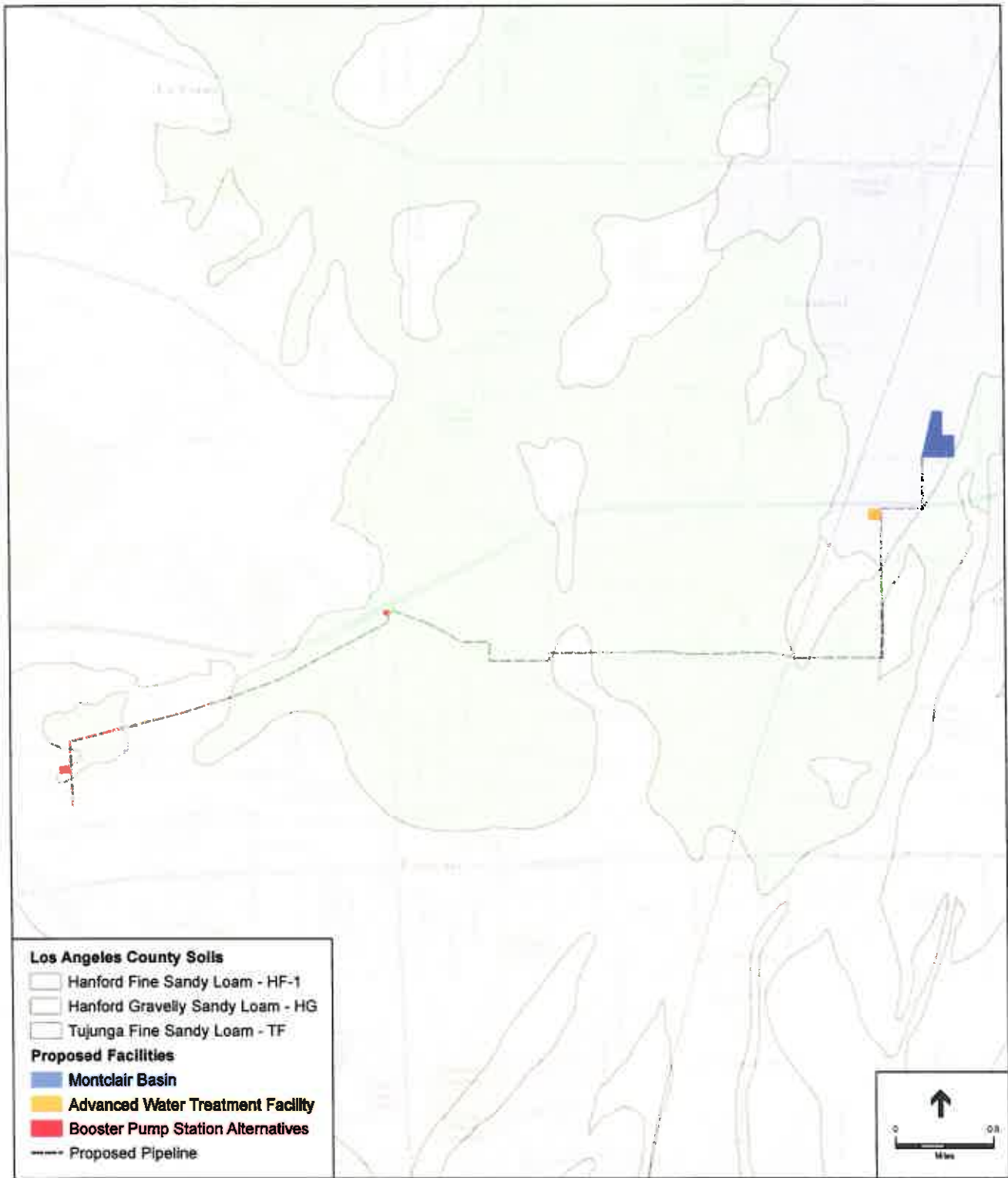




SOURCE: ESRI, CGS, IEUA 2015

IEUA Pomona Intertie Project . 150283.02

**Figure 5**  
Geologic Hazards Map



SOURCE: ESRI, USGS, IEUA 2015

IEUA Pomona Intertie Project . 150283.02

**Figure 6**  
Soils Map

**APPENDIX A**

**Pomona Pipeline & AWTF**  
**South Coast AQMD Air District, Summer**

**1.0 Project Characteristics**

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**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Manufacturing	127.00	1000sqft	2.92	127,000.00	0

**1.2 Other Project Characteristics**

<b>Urbanization</b>	Urban	<b>Wind Speed (m/s)</b>	2.2	<b>Precipitation Freq (Days)</b>	31
<b>Climate Zone</b>	9			<b>Operational Year</b>	2018
<b>Utility Company</b>	Southern California Edison				
<b>CO2 Intensity (lb/MWhr)</b>	630.89	<b>CH4 Intensity (lb/MWhr)</b>	0.029	<b>N2O Intensity (lb/MWhr)</b>	0.006

**1.3 User Entered Comments & Non-Default Data**

**Project Characteristics -****Land Use -****Construction Phase - Phases adjusted for duration of construction provided.****Off-road Equipment - Equipment adjusted for list provided.****Off-road Equipment -****Off-road Equipment - Equipment adjusted for list provided. Concrete and water truck input as off-hwy truck.****Off-road Equipment - Equipment adjusted from list provided in PD.****Trips and VMT - assume 23 daily haul trips for demo phase =46 total trips****Vehicle Trips - 48 total deliveries per yr/252 wkdays/yr / 127 (1000SF)=.0008 wkdy trip rates****Vehicle Emission Factors - HHD vehicles only for deliveries****Vehicle Emission Factors - HHD only for deliveries throughout the year****Vehicle Emission Factors -**

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	220.00	283.00
tblConstructionPhase	NumDays	220.00	130.00
tblConstructionPhase	PhaseEndDate	2/28/2018	1/31/2018
tblConstructionPhase	PhaseEndDate	5/1/2017	1/27/2017
tblConstructionPhase	PhaseEndDate	8/1/2018	6/30/2017
tblConstructionPhase	PhaseStartDate	1/28/2017	1/1/2017
tblConstructionPhase	PhaseStartDate	4/4/2017	1/1/2017
tblConstructionPhase	PhaseStartDate	2/1/2018	1/1/2017
tblOffRoadEquipment	HorsePower	8.00	84.00
tblOffRoadEquipment	HorsePower	97.00	89.00
tblOffRoadEquipment	HorsePower	46.00	174.00
tblOffRoadEquipment	HorsePower	162.00	255.00
tblOffRoadEquipment	HorsePower	8.00	174.00
tblOffRoadEquipment	HorsePower	162.00	361.00

tblOffRoadEquipment	HorsePower	400.00	46.00
tblOffRoadEquipment	LoadFactor	0.43	0.74
tblOffRoadEquipment	LoadFactor	0.37	0.20
tblOffRoadEquipment	LoadFactor	0.45	0.41
tblOffRoadEquipment	LoadFactor	0.38	0.40
tblOffRoadEquipment	LoadFactor	0.43	0.41
tblOffRoadEquipment	LoadFactor	0.38	0.48
tblOffRoadEquipment	LoadFactor	0.38	0.45
tblOffRoadEquipment	LoadFactor	0.38	0.38
tblOffRoadEquipment	OffRoadEquipmentType	Generator Sets	Plate Compactors
tblOffRoadEquipment	OffRoadEquipmentType	Graders	Welders
tblOffRoadEquipment	OffRoadEquipmentType	Rubber Tired Dozers	Excavators
tblOffRoadEquipment	OffRoadEquipmentType	Graders	Plate Compactors
tblOffRoadEquipment	OffRoadEquipmentType	Scrapers	Excavators
tblOffRoadEquipment	OffRoadEquipmentType	Welders	Off-Highway Trucks
tblOffRoadEquipment	OffRoadEquipmentType		Rollers
tblOffRoadEquipment	OffRoadEquipmentType		Plate Compactors
tblOffRoadEquipment	UsageHours	6.00	7.00
tblOffRoadEquipment	UsageHours	6.00	8.00
tblOffRoadEquipment	UsageHours	6.00	8.00
tblProjectCharacteristics	OperationalYear	2014	2018
tblTripsAndVMT	HaulingTripNumber	0.00	46.00
tblTripsAndVMT	VendorTripNumber	21.00	0.00
tblVehicleEF	HHD	0.03	1.00
tblVehicleEF	HHD	0.03	1.00
tblVehicleEF	LDA	0.51	0.00
tblVehicleEF	LDA	0.51	0.00
tblVehicleEF	LDT1	0.06	0.00

tblVehicleEF	LDT1	0.06	0.00
tblVehicleEF	LDT2	0.18	0.00
tblVehicleEF	LDT2	0.18	0.00
tblVehicleEF	LHD1	0.04	0.00
tblVehicleEF	LHD1	0.04	0.00
tblVehicleEF	LHD2	6.6810e-003	0.00
tblVehicleEF	LHD2	6.6810e-003	0.00
tblVehicleEF	MCY	4.3700e-003	0.00
tblVehicleEF	MCY	4.3700e-003	0.00
tblVehicleEF	MDV	0.14	0.00
tblVehicleEF	MDV	0.14	0.00
tblVehicleEF	MH	2.1350e-003	0.00
tblVehicleEF	MH	2.1350e-003	0.00
tblVehicleEF	MHD	0.02	0.00
tblVehicleEF	MHD	0.02	0.00
tblVehicleEF	OBUS	1.9380e-003	0.00
tblVehicleEF	OBUS	1.9380e-003	0.00
tblVehicleEF	SBUS	5.8600e-004	0.00
tblVehicleEF	SBUS	5.8600e-004	0.00
tblVehicleEF	UBUS	2.4930e-003	0.00
tblVehicleEF	UBUS	2.4930e-003	0.00
tblVehicleTrips	ST_TR	1.49	0.00
tblVehicleTrips	SU_TR	0.62	0.00
tblVehicleTrips	WD_TR	3.82	8.0000e-004

## 2.0 Emissions Summary

**2.1 Overall Construction (Maximum Daily Emission)**

**Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2016	1.9881	19.8413	12.8599	0.0300	0.1453	0.9927	1.1380	0.0385	0.9348	0.9734	0.0000	2,997.5877	2,997.5877	0.6971	0.0000	3,012.2262
2017	5.1941	49.4940	39.6463	0.0837	1.5909	2.6756	4.2665	0.4248	2.4808	2.9056	0.0000	8,082.8870	8,082.8870	1.7408	0.0000	8,119.4435
2018	1.2696	12.1854	10.5224	0.0222	0.7237	0.5857	1.3094	0.1945	0.5389	0.7334	0.0000	2,043.1522	2,043.1522	0.3473	0.0000	2,050.4455
<b>Total</b>	<b>8.4517</b>	<b>81.5207</b>	<b>63.0286</b>	<b>0.1359</b>	<b>2.4600</b>	<b>4.2540</b>	<b>6.7140</b>	<b>0.6579</b>	<b>3.9545</b>	<b>4.6123</b>	<b>0.0000</b>	<b>13,123.6270</b>	<b>13,123.6270</b>	<b>2.7852</b>	<b>0.0000</b>	<b>13,182.1162</b>

**Mitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2016	1.9881	19.8413	12.8599	0.0300	0.1453	0.9927	1.1380	0.0385	0.9348	0.9734	0.0000	2,997.5877	2,997.5877	0.6971	0.0000	3,012.2262
2017	5.1941	49.4940	39.6463	0.0837	1.5909	2.6756	4.2665	0.4248	2.4808	2.9056	0.0000	8,082.8870	8,082.8870	1.7408	0.0000	8,119.4435
2018	1.2696	12.1854	10.5224	0.0222	0.7237	0.5857	1.3094	0.1945	0.5389	0.7334	0.0000	2,043.1522	2,043.1522	0.3473	0.0000	2,050.4455
<b>Total</b>	<b>8.4517</b>	<b>81.5207</b>	<b>63.0286</b>	<b>0.1359</b>	<b>2.4600</b>	<b>4.2540</b>	<b>6.7140</b>	<b>0.6579</b>	<b>3.9545</b>	<b>4.6123</b>	<b>0.0000</b>	<b>13,123.6269</b>	<b>13,123.6269</b>	<b>2.7852</b>	<b>0.0000</b>	<b>13,182.1151</b>





**2.2 Overall Operational**

**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	3.3222	1.2000e-004	0.0132	0.0000		5.0000e-005	5.0000e-005		5.0000e-005	5.0000e-005		0.0278	0.0278	8.0000e-005		0.0294
Energy	0.0706	0.6417	0.5390	3.8500e-003		0.0488	0.0488		0.0488	0.0488		769.9823	769.9823	0.0148	0.0141	774.6683
Mobile	1.1800e-003	0.0150	0.0154	5.0000e-005	1.0800e-003	2.5000e-004	1.3200e-003	2.9000e-004	2.3000e-004	5.2000e-004		4.4763	4.4763	3.0000e-005		4.4771
<b>Total</b>	<b>3.3940</b>	<b>0.6568</b>	<b>0.5675</b>	<b>3.9000e-003</b>	<b>1.0800e-003</b>	<b>0.0491</b>	<b>0.0501</b>	<b>2.9000e-004</b>	<b>0.0491</b>	<b>0.0493</b>		<b>774.4864</b>	<b>774.4864</b>	<b>0.0149</b>	<b>0.0141</b>	<b>779.1747</b>

**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	3.3222	1.2000e-004	0.0132	0.0000		5.0000e-005	5.0000e-005		5.0000e-005	5.0000e-005		0.0278	0.0278	8.0000e-005		0.0294
Energy	0.0706	0.6417	0.5390	3.8500e-003		0.0488	0.0488		0.0488	0.0488		769.9823	769.9823	0.0148	0.0141	774.6683
Mobile	1.1800e-003	0.0150	0.0154	5.0000e-005	1.0800e-003	2.5000e-004	1.3200e-003	2.9000e-004	2.3000e-004	5.2000e-004		4.4763	4.4763	3.0000e-005		4.4771
<b>Total</b>	<b>3.3940</b>	<b>0.6568</b>	<b>0.5675</b>	<b>3.9000e-003</b>	<b>1.0800e-003</b>	<b>0.0491</b>	<b>0.0501</b>	<b>2.9000e-004</b>	<b>0.0491</b>	<b>0.0493</b>		<b>774.4864</b>	<b>774.4864</b>	<b>0.0149</b>	<b>0.0141</b>	<b>779.1747</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

### 3.0 Construction Detail

#### Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Pipeline	Trenching	7/1/2016	4/3/2017	5	197	
2	Demolition-Existing Facility	Demolition	1/1/2017	1/27/2017	5	20	
3	AWTF	Building Construction	1/1/2017	1/31/2018	5	283	
4	Booster Pump Station	Building Construction	1/1/2017	6/30/2017	5	130	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0 (Architectural Coating – sqft)

#### OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
AWTF	Plate Compactors	1	8.00	84	0.74
AWTF	Cranes	1	8.00	226	0.29
AWTF	Tractors/Loaders/Backhoes	1	7.00	89	0.20
Pipeline	Welders	1	8.00	174	0.41
Booster Pump Station	Excavators	1	8.00	255	0.40
AWTF	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Demolition-Existing Facility	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Booster Pump Station	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Pipeline	Rollers	1	8.00	80	0.38
Pipeline	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Booster Pump Station	Plate Compactors	1	8.00	174	0.41
Pipeline	Plate Compactors	1	8.00	8	0.43
Pipeline	Excavators	1	8.00	361	0.48
AWTF	Off-Highway Trucks	2	6.00	46	0.45

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition-Existing Facility	3	8.00	0.00	46.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Pipeline	5	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Booster Pump Station	3	53.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
AWTF	6	53.00	21.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

**3.1 Mitigation Measures Construction**

**3.2 Pipeline - 2016**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.9338	19.7734	12.0149	0.0282		0.9915	0.9915		0.9337	0.9337		2,842.9581	2,842.9581	0.6891		2,857.4300
<b>Total</b>	<b>1.9338</b>	<b>19.7734</b>	<b>12.0149</b>	<b>0.0282</b>		<b>0.9915</b>	<b>0.9915</b>		<b>0.9337</b>	<b>0.9337</b>		<b>2,842.9581</b>	<b>2,842.9581</b>	<b>0.6891</b>		<b>2,857.4300</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0543	0.0679	0.8450	1.8400e-003	0.1453	1.2100e-003	0.1465	0.0385	1.1200e-003	0.0397		154.6296	154.6296	7.9300e-003		154.7962
<b>Total</b>	<b>0.0543</b>	<b>0.0679</b>	<b>0.8450</b>	<b>1.8400e-003</b>	<b>0.1453</b>	<b>1.2100e-003</b>	<b>0.1465</b>	<b>0.0385</b>	<b>1.1200e-003</b>	<b>0.0397</b>		<b>154.6296</b>	<b>154.6296</b>	<b>7.9300e-003</b>		<b>154.7962</b>

**3.2 Pipeline - 2016**

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.9338	19.7734	12.0149	0.0282		0.9915	0.9915		0.9337	0.9337	0.0000	2,842.9581	2,842.9581	0.6891		2,857.4300
<b>Total</b>	<b>1.9338</b>	<b>19.7734</b>	<b>12.0149</b>	<b>0.0282</b>		<b>0.9915</b>	<b>0.9915</b>		<b>0.9337</b>	<b>0.9337</b>	<b>0.0000</b>	<b>2,842.9581</b>	<b>2,842.9581</b>	<b>0.6891</b>		<b>2,857.4300</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0543	0.0679	0.8450	1.8400e-003	0.1453	1.2100e-003	0.1465	0.0385	1.1200e-003	0.0397		154.6296	154.6296	7.9300e-003		154.7962
<b>Total</b>	<b>0.0543</b>	<b>0.0679</b>	<b>0.8450</b>	<b>1.8400e-003</b>	<b>0.1453</b>	<b>1.2100e-003</b>	<b>0.1465</b>	<b>0.0385</b>	<b>1.1200e-003</b>	<b>0.0397</b>		<b>154.6296</b>	<b>154.6296</b>	<b>7.9300e-003</b>		<b>154.7962</b>

**3.2 Pipeline - 2017**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7911	17.9234	11.8643	0.0282		0.8957	0.8957		0.8432	0.8432		2,811.1024	2,811.1024	0.6843		2,825.4730
<b>Total</b>	<b>1.7911</b>	<b>17.9234</b>	<b>11.8643</b>	<b>0.0282</b>		<b>0.8957</b>	<b>0.8957</b>		<b>0.8432</b>	<b>0.8432</b>		<b>2,811.1024</b>	<b>2,811.1024</b>	<b>0.6843</b>		<b>2,825.4730</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0488	0.0613	0.7644	1.8400e-003	0.1453	1.1700e-003	0.1465	0.0385	1.0800e-003	0.0398		148.7114	148.7114	7.3200e-003		148.8651
<b>Total</b>	<b>0.0488</b>	<b>0.0613</b>	<b>0.7644</b>	<b>1.8400e-003</b>	<b>0.1453</b>	<b>1.1700e-003</b>	<b>0.1465</b>	<b>0.0385</b>	<b>1.0800e-003</b>	<b>0.0398</b>		<b>148.7114</b>	<b>148.7114</b>	<b>7.3200e-003</b>		<b>148.8651</b>

**3.2 Pipeline - 2017**

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7911	17.9234	11.8643	0.0282		0.8957	0.8957		0.8432	0.8432	0.0000	2,811.1024	2,811.1024	0.6843		2,825.4730
<b>Total</b>	<b>1.7911</b>	<b>17.9234</b>	<b>11.8643</b>	<b>0.0282</b>		<b>0.8957</b>	<b>0.8957</b>		<b>0.8432</b>	<b>0.8432</b>	<b>0.0000</b>	<b>2,811.1024</b>	<b>2,811.1024</b>	<b>0.6843</b>		<b>2,825.4730</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0488	0.0613	0.7644	1.8400e-003	0.1453	1.1700e-003	0.1465	0.0385	1.0800e-003	0.0396		148.7114	148.7114	7.3200e-003		148.8651
<b>Total</b>	<b>0.0488</b>	<b>0.0613</b>	<b>0.7644</b>	<b>1.8400e-003</b>	<b>0.1453</b>	<b>1.1700e-003</b>	<b>0.1465</b>	<b>0.0385</b>	<b>1.0800e-003</b>	<b>0.0396</b>		<b>148.7114</b>	<b>148.7114</b>	<b>7.3200e-003</b>		<b>148.8651</b>



**3.3 Demolition-Exsiting Facility - 2017**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9504	9.1316	7.1815	9.3300e-003		0.6868	0.6868		0.6318	0.6318		954.7948	954.7948	0.2926		960.9383
<b>Total</b>	<b>0.9504</b>	<b>9.1316</b>	<b>7.1815</b>	<b>9.3300e-003</b>		<b>0.6868</b>	<b>0.6868</b>		<b>0.6318</b>	<b>0.6318</b>		<b>954.7948</b>	<b>954.7948</b>	<b>0.2926</b>		<b>960.9383</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0372	0.5779	0.4277	1.6900e-003	0.0401	9.1500e-003	0.0492	0.0110	8.4100e-003	0.0194		168.1190	168.1190	1.1900e-003		168.1440
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0300	0.0377	0.4704	1.1300e-003	0.0894	7.2000e-004	0.0901	0.0237	6.6000e-004	0.0244		91.5147	91.5147	4.5000e-003		91.6093
<b>Total</b>	<b>0.0672</b>	<b>0.6156</b>	<b>0.8980</b>	<b>2.8200e-003</b>	<b>0.1295</b>	<b>9.8700e-003</b>	<b>0.1394</b>	<b>0.0347</b>	<b>9.0700e-003</b>	<b>0.0438</b>		<b>259.6337</b>	<b>259.6337</b>	<b>5.6900e-003</b>		<b>259.7533</b>

### 3.3 Demolition-Exsiting Facility - 2017

#### Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9504	9.1316	7.1815	9.3300e-003		0.6868	0.6868		0.6318	0.6318	0.0000	954.7948	954.7948	0.2926		960.9383
<b>Total</b>	<b>0.9504</b>	<b>9.1316</b>	<b>7.1815</b>	<b>9.3300e-003</b>		<b>0.6868</b>	<b>0.6868</b>		<b>0.6318</b>	<b>0.6318</b>	<b>0.0000</b>	<b>954.7948</b>	<b>954.7948</b>	<b>0.2926</b>		<b>960.9383</b>

#### Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0372	0.5779	0.4277	1.6900e-003	0.0401	9.1500e-003	0.0492	0.0110	8.4100e-003	0.0194		168.1190	168.1190	1.1900e-003		168.1440
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0300	0.0377	0.4704	1.1300e-003	0.0894	7.2000e-004	0.0901	0.0237	6.6000e-004	0.0244		91.5147	91.5147	4.5000e-003		91.6093
<b>Total</b>	<b>0.0672</b>	<b>0.6156</b>	<b>0.8980</b>	<b>2.8200e-003</b>	<b>0.1295</b>	<b>9.8700e-003</b>	<b>0.1394</b>	<b>0.0347</b>	<b>9.0700e-003</b>	<b>0.0438</b>		<b>259.6337</b>	<b>259.6337</b>	<b>5.6900e-003</b>		<b>259.7633</b>

**3.4 AWTF - 2017**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.1023	12.0578	6.1890	0.0101		0.6712	0.6712		0.6175	0.6175		1,033.6188	1,033.6188	0.3167		1,040.2694
<b>Total</b>	<b>1.1023</b>	<b>12.0578</b>	<b>6.1890</b>	<b>0.0101</b>		<b>0.6712</b>	<b>0.6712</b>		<b>0.6175</b>	<b>0.6175</b>		<b>1,033.6188</b>	<b>1,033.6188</b>	<b>0.3167</b>		<b>1,040.2694</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1602	1.6503	1.9668	4.5800e-003	0.1313	0.0288	0.1579	0.0374	0.0245	0.0619		450.4447	450.4447	3.1600e-003		450.5110
Worker	0.1990	0.2499	3.1162	7.5000e-003	0.5924	4.7600e-003	0.5972	0.1571	4.3900e-003	0.1615		606.2848	606.2848	0.0299		606.9115
<b>Total</b>	<b>0.3692</b>	<b>1.9002</b>	<b>5.0830</b>	<b>0.0121</b>	<b>0.7237</b>	<b>0.0314</b>	<b>0.7551</b>	<b>0.1945</b>	<b>0.0289</b>	<b>0.2234</b>		<b>1,056.7294</b>	<b>1,056.7294</b>	<b>0.0330</b>		<b>1,057.4225</b>

**3.4 AWTF - 2017**

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.1023	12.0578	6.1890	0.0101		0.6712	0.6712		0.6175	0.6175	0.0000	1,033.6188	1,033.6188	0.3167		1,040.2694
<b>Total</b>	<b>1.1023</b>	<b>12.0578</b>	<b>6.1890</b>	<b>0.0101</b>		<b>0.6712</b>	<b>0.6712</b>		<b>0.6175</b>	<b>0.6175</b>	<b>0.0000</b>	<b>1,033.6188</b>	<b>1,033.6188</b>	<b>0.3167</b>		<b>1,040.2694</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1602	1.6503	1.8668	4.5800e-003	0.1313	0.0286	0.1579	0.0374	0.0245	0.0619		450.4447	450.4447	3.1800e-003		450.5110
Worker	0.1990	0.2499	3.1162	7.5000e-003	0.5924	4.7800e-003	0.5972	0.1571	4.3900e-003	0.1615		606.2848	606.2848	0.0299		606.9115
<b>Total</b>	<b>0.3592</b>	<b>1.9002</b>	<b>5.0830</b>	<b>0.0121</b>	<b>0.7237</b>	<b>0.0314</b>	<b>0.7551</b>	<b>0.1945</b>	<b>0.0289</b>	<b>0.2234</b>		<b>1,056.7294</b>	<b>1,056.7294</b>	<b>0.0330</b>		<b>1,057.4225</b>

**3.4 AWTF - 2018**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9400	10.4441	5.8180	0.0101		0.5560	0.5560		0.5115	0.5115		1,016.5406	1,016.5406	0.3165		1,023.1863
<b>Total</b>	<b>0.9400</b>	<b>10.4441</b>	<b>5.8180</b>	<b>0.0101</b>		<b>0.5560</b>	<b>0.5560</b>		<b>0.5115</b>	<b>0.5115</b>		<b>1,016.5406</b>	<b>1,016.5406</b>	<b>0.3165</b>		<b>1,023.1863</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1502	1.5146	1.8737	4.5800e-003	0.1313	0.0251	0.1564	0.0374	0.0231	0.0605		442.8860	442.8860	3.1400e-003		442.9519
Worker	0.1793	0.2267	2.8307	7.5000e-003	0.5924	4.6400e-003	0.5971	0.1571	4.2900e-003	0.1614		583.7257	583.7257	0.0277		584.3073
<b>Total</b>	<b>0.3296</b>	<b>1.7413</b>	<b>4.7044</b>	<b>0.0121</b>	<b>0.7237</b>	<b>0.0297</b>	<b>0.7535</b>	<b>0.1946</b>	<b>0.0274</b>	<b>0.2219</b>		<b>1,026.6116</b>	<b>1,026.6116</b>	<b>0.0308</b>		<b>1,027.2592</b>

**3.4 AWTF - 2018**

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9400	10.4441	5.8180	0.0101		0.5580	0.5580		0.5115	0.5115	0.0000	1,016.5406	1,016.5406	0.3165		1,023.1863
<b>Total</b>	<b>0.9400</b>	<b>10.4441</b>	<b>5.8180</b>	<b>0.0101</b>		<b>0.5580</b>	<b>0.5580</b>		<b>0.5115</b>	<b>0.5115</b>	<b>0.0000</b>	<b>1,016.5406</b>	<b>1,016.5406</b>	<b>0.3165</b>		<b>1,023.1863</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1502	1.5146	1.8737	4.5600e-003	0.1313	0.0251	0.1564	0.0374	0.0231	0.0605		442.8860	442.8860	3.1400e-003		442.9519
Worker	0.1793	0.2287	2.8307	7.5000e-003	0.5924	4.6400e-003	0.5971	0.1571	4.2900e-003	0.1614		583.7257	583.7257	0.0277		584.3073
<b>Total</b>	<b>0.3296</b>	<b>1.7413</b>	<b>4.7044</b>	<b>0.0121</b>	<b>0.7237</b>	<b>0.0297</b>	<b>0.7535</b>	<b>0.1945</b>	<b>0.0274</b>	<b>0.2219</b>		<b>1,026.6116</b>	<b>1,026.6116</b>	<b>0.0308</b>		<b>1,027.2592</b>

**3.5 Booster Pump Station - 2017**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6762	7.5542	4.5499	0.0119		0.3748	0.3748		0.3448	0.3448		1,212.0118	1,212.0118	0.3714		1,219.8103
<b>Total</b>	<b>0.6762</b>	<b>7.5542</b>	<b>4.5499</b>	<b>0.0119</b>		<b>0.3748</b>	<b>0.3748</b>		<b>0.3448</b>	<b>0.3448</b>		<b>1,212.0118</b>	<b>1,212.0118</b>	<b>0.3714</b>		<b>1,219.8103</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1990	0.2499	3.1162	7.5000e-003	0.5924	4.7600e-003	0.5972	0.1571	4.3900e-003	0.1615		606.2848	606.2848	0.0299		606.9115
<b>Total</b>	<b>0.1990</b>	<b>0.2499</b>	<b>3.1162</b>	<b>7.5000e-003</b>	<b>0.5924</b>	<b>4.7600e-003</b>	<b>0.5972</b>	<b>0.1571</b>	<b>4.3900e-003</b>	<b>0.1615</b>		<b>606.2848</b>	<b>606.2848</b>	<b>0.0299</b>		<b>606.9115</b>

**3.5 Booster Pump Station - 2017**

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8762	7.5542	4.5499	0.0119		0.3748	0.3748		0.3448	0.3448	0.0000	1,212.0118	1,212.0118	0.3714		1,219.8103
<b>Total</b>	<b>0.8762</b>	<b>7.5542</b>	<b>4.5499</b>	<b>0.0119</b>		<b>0.3748</b>	<b>0.3748</b>		<b>0.3448</b>	<b>0.3448</b>	<b>0.0000</b>	<b>1,212.0118</b>	<b>1,212.0118</b>	<b>0.3714</b>		<b>1,219.8103</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1990	0.2499	3.1162	7.5000e-003	0.5924	4.7600e-003	0.5972	0.1571	4.3900e-003	0.1615		606.2848	606.2848	0.0299		606.9115
<b>Total</b>	<b>0.1990</b>	<b>0.2499</b>	<b>3.1162</b>	<b>7.5000e-003</b>	<b>0.5924</b>	<b>4.7600e-003</b>	<b>0.5972</b>	<b>0.1571</b>	<b>4.3900e-003</b>	<b>0.1615</b>		<b>606.2848</b>	<b>606.2848</b>	<b>0.0299</b>		<b>606.9115</b>

**4.0 Operational Detail - Mobile**



**4.1 Mitigation Measures Mobile**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	1.1800e-003	0.0150	0.0154	5.0000e-005	1.0800e-003	2.5000e-004	1.3200e-003	2.9000e-004	2.3000e-004	5.2000e-004		4.4783	4.4783	3.0000e-005		4.4771
Unmitigated	1.1800e-003	0.0150	0.0154	5.0000e-005	1.0800e-003	2.5000e-004	1.3200e-003	2.9000e-004	2.3000e-004	5.2000e-004		4.4783	4.4783	3.0000e-005		4.4771

**4.2 Trip Summary Information**

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Manufacturing	0.10	0.00	0.00	321	321
Total	0.10	0.00	0.00	321	321

**4.3 Trip Type Information**

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Manufacturing	16.80	8.40	6.90	59.00	28.00	13.00	92	5	3

LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	1.000000	0.000000	0.000000	0.000000	0.000000	0.000000

**5.0 Energy Detail**

**5.1 Fleet Mix**

Historical Energy Use: N

**5.1 Mitigation Measures Energy**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0706	0.6417	0.5390	3.8500e-003		0.0488	0.0488		0.0488	0.0488		769.9823	769.9823	0.0148	0.0141	774.6683
NaturalGas Unmitigated	0.0706	0.6417	0.5390	3.8500e-003		0.0488	0.0488		0.0488	0.0488		769.9823	769.9823	0.0148	0.0141	774.6683

**5.2 Energy by Land Use - NaturalGas**

**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Manufacturing	6544.85	0.0706	0.6417	0.5390	3.8500e-003		0.0488	0.0488		0.0488	0.0488		769.9823	769.9823	0.0148	0.0141	774.6683
Total		0.0706	0.6417	0.5390	3.8500e-003		0.0488	0.0488		0.0488	0.0488		769.9823	769.9823	0.0148	0.0141	774.6683

### 5.2 Energy by Land Use - NaturalGas

#### Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Manufacturing	6.54485	0.0708	0.6417	0.5390	3.8500e-003		0.0488	0.0488		0.0488	0.0488		769.9823	769.9823	0.0148	0.0141	774.6683
<b>Total</b>		<b>0.0706</b>	<b>0.6417</b>	<b>0.5390</b>	<b>3.8500e-003</b>		<b>0.0488</b>	<b>0.0488</b>		<b>0.0488</b>	<b>0.0488</b>		<b>769.9823</b>	<b>769.9823</b>	<b>0.0148</b>	<b>0.0141</b>	<b>774.6683</b>

### 6.0 Area Detail

#### 6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	3.3222	1.2000e-004	0.0132	0.0000		5.0000e-005	5.0000e-005		5.0000e-005	5.0000e-005		0.0278	0.0278	8.0000e-005		0.0294
Unmitigated	3.3222	1.2000e-004	0.0132	0.0000		5.0000e-005	5.0000e-005		5.0000e-005	5.0000e-005		0.0278	0.0278	8.0000e-005		0.0294

**6.2 Area by SubCategory**

**Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.8064					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	2.5146					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.2600e-003	1.2000e-004	0.0132	0.0000		5.0000e-005	5.0000e-005		5.0000e-005	5.0000e-005		0.0278	0.0278	8.0000e-005		0.0294
<b>Total</b>	<b>3.3222</b>	<b>1.2000e-004</b>	<b>0.0132</b>	<b>0.0000</b>		<b>5.0000e-005</b>	<b>5.0000e-005</b>		<b>5.0000e-005</b>	<b>5.0000e-005</b>		<b>0.0278</b>	<b>0.0278</b>	<b>8.0000e-005</b>		<b>0.0294</b>

**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.8064					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	2.5146					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.2600e-003	1.2000e-004	0.0132	0.0000		5.0000e-005	5.0000e-005		5.0000e-005	5.0000e-005		0.0278	0.0278	8.0000e-005		0.0294
<b>Total</b>	<b>3.3222</b>	<b>1.2000e-004</b>	<b>0.0132</b>	<b>0.0000</b>		<b>5.0000e-005</b>	<b>5.0000e-005</b>		<b>5.0000e-005</b>	<b>5.0000e-005</b>		<b>0.0278</b>	<b>0.0278</b>	<b>8.0000e-005</b>		<b>0.0294</b>

**7.0 Water Detail**

**7.1 Mitigation Measures Water**

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

**9.0 Operational Offroad**

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Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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**10.0 Vegetation**

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**Pomona Pipeline & AWTF  
South Coast AQMD Air District, Annual**

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Manufacturing	127.00	1000sqft	2.92	127,000.00	0

**1.2 Other Project Characteristics**

<b>Urbanization</b>	Urban	<b>Wind Speed (m/s)</b>	2.2	<b>Precipitation Freq (Days)</b>	31
<b>Climate Zone</b>	9			<b>Operational Year</b>	2018
<b>Utility Company</b>	Southern California Edison				
<b>CO2 Intensity (lb/MWhr)</b>	630.89	<b>CH4 Intensity (lb/MWhr)</b>	0.029	<b>N2O Intensity (lb/MWhr)</b>	0.006

**1.3 User Entered Comments & Non-Default Data**

Project Characteristics -

Land Use -

Construction Phase - Phases adjusted for duration of construction provided.

Off-road Equipment - Equipment adjusted for list provided.

Off-road Equipment -

Off-road Equipment - Equipment adjusted for list provided. Concrete and water truck input as off-hwy truck.

Off-road Equipment - Equipment adjusted from list provided in PD.

Trips and VMT - assume 23 daily haul trips for demo phase =46 total trips

Vehicle Trips - 48 total deliveries per yr/252 wkdays/yr / 127 (1000SF)=.0008 wkdy trip rates

Vehicle Emission Factors - HHD vehicles only for deliveries

Vehicle Emission Factors - HHD only for deliveries throughout the year

Vehicle Emission Factors -

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	220.00	283.00
tblConstructionPhase	NumDays	220.00	130.00
tblConstructionPhase	PhaseEndDate	2/28/2018	1/31/2018
tblConstructionPhase	PhaseEndDate	5/1/2017	1/27/2017
tblConstructionPhase	PhaseEndDate	8/1/2018	6/30/2017
tblConstructionPhase	PhaseStartDate	1/28/2017	1/1/2017
tblConstructionPhase	PhaseStartDate	4/4/2017	1/1/2017
tblConstructionPhase	PhaseStartDate	2/1/2018	1/1/2017
tblOffRoadEquipment	HorsePower	8.00	84.00
tblOffRoadEquipment	HorsePower	97.00	89.00
tblOffRoadEquipment	HorsePower	46.00	174.00
tblOffRoadEquipment	HorsePower	162.00	255.00
tblOffRoadEquipment	HorsePower	8.00	174.00
tblOffRoadEquipment	HorsePower	162.00	361.00

tblOffRoadEquipment	HorsePower	400.00	46.00
tblOffRoadEquipment	LoadFactor	0.43	0.74
tblOffRoadEquipment	LoadFactor	0.37	0.20
tblOffRoadEquipment	LoadFactor	0.45	0.41
tblOffRoadEquipment	LoadFactor	0.38	0.40
tblOffRoadEquipment	LoadFactor	0.43	0.41
tblOffRoadEquipment	LoadFactor	0.38	0.48
tblOffRoadEquipment	LoadFactor	0.38	0.45
tblOffRoadEquipment	LoadFactor	0.38	0.38
tblOffRoadEquipment	OffRoadEquipmentType	Generator Sets	Plate Compactors
tblOffRoadEquipment	OffRoadEquipmentType	Graders	Welders
tblOffRoadEquipment	OffRoadEquipmentType	Rubber Tired Dozers	Excavators
tblOffRoadEquipment	OffRoadEquipmentType	Graders	Plate Compactors
tblOffRoadEquipment	OffRoadEquipmentType	Scrapers	Excavators
tblOffRoadEquipment	OffRoadEquipmentType	Welders	Off-Highway Trucks
tblOffRoadEquipment	OffRoadEquipmentType		Rollers
tblOffRoadEquipment	OffRoadEquipmentType		Plate Compactors
tblOffRoadEquipment	UsageHours	6.00	7.00
tblOffRoadEquipment	UsageHours	6.00	8.00
tblOffRoadEquipment	UsageHours	6.00	8.00
tblProjectCharacteristics	OperationalYear	2014	2018
tblTripsAndVMT	HaulingTripNumber	0.00	46.00
tblTripsAndVMT	VendorTripNumber	21.00	0.00
tblVehicleEF	HHD	0.03	1.00
tblVehicleEF	HHD	0.03	1.00
tblVehicleEF	LDA	0.51	0.00
tblVehicleEF	LDA	0.51	0.00
tblVehicleEF	LDT1	0.06	0.00



tblVehicleEF	LDT1	0.06	0.00
tblVehicleEF	LDT2	0.18	0.00
tblVehicleEF	LDT2	0.18	0.00
tblVehicleEF	LHD1	0.04	0.00
tblVehicleEF	LHD1	0.04	0.00
tblVehicleEF	LHD2	6.6810e-003	0.00
tblVehicleEF	LHD2	6.6810e-003	0.00
tblVehicleEF	MCY	4.3700e-003	0.00
tblVehicleEF	MCY	4.3700e-003	0.00
tblVehicleEF	MDV	0.14	0.00
tblVehicleEF	MDV	0.14	0.00
tblVehicleEF	MH	2.1350e-003	0.00
tblVehicleEF	MH	2.1350e-003	0.00
tblVehicleEF	MHD	0.02	0.00
tblVehicleEF	MHD	0.02	0.00
tblVehicleEF	OBUS	1.9380e-003	0.00
tblVehicleEF	OBUS	1.9380e-003	0.00
tblVehicleEF	SBUS	5.8600e-004	0.00
tblVehicleEF	SBUS	5.8600e-004	0.00
tblVehicleEF	UBUS	2.4930e-003	0.00
tblVehicleEF	UBUS	2.4930e-003	0.00
tblVehicleTrips	ST_TR	1.49	0.00
tblVehicleTrips	SU_TR	0.62	0.00
tblVehicleTrips	WD_TR	3.82	8.0000e-004

## 2.0 Emissions Summary

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**2.1 Overall Construction**

**Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2016	0.1301	1.3002	0.8392	1.9600e-003	9.3400e-003	0.0650	0.0744	2.4800e-003	0.0612	0.0637	0.0000	177.8826	177.8826	0.0414	0.0000	178.5525
2017	0.3174	3.0294	2.4696	5.1800e-003	0.1362	0.1526	0.2888	0.0365	0.1410	0.1775	0.0000	447.8275	447.8275	0.0883	0.0000	449.6822
2018	0.0146	0.1412	0.1230	2.5000e-004	8.1700e-003	6.7400e-003	0.0149	2.2000e-003	6.2000e-003	8.4000e-003	0.0000	21.0088	21.0088	3.6200e-003	0.0000	21.0849
<b>Total</b>	<b>0.4621</b>	<b>4.4708</b>	<b>3.4318</b>	<b>7.3900e-003</b>	<b>0.1637</b>	<b>0.2244</b>	<b>0.3780</b>	<b>0.0412</b>	<b>0.2084</b>	<b>0.2496</b>	<b>0.0000</b>	<b>646.5190</b>	<b>646.5190</b>	<b>0.1334</b>	<b>0.0000</b>	<b>649.3195</b>

**Mitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2016	0.1301	1.3002	0.8392	1.9600e-003	9.3400e-003	0.0650	0.0744	2.4800e-003	0.0612	0.0637	0.0000	177.8824	177.8824	0.0414	0.0000	178.5523
2017	0.3174	3.0294	2.4696	5.1800e-003	0.1362	0.1526	0.2888	0.0365	0.1410	0.1775	0.0000	447.8272	447.8272	0.0883	0.0000	449.6818
2018	0.0146	0.1412	0.1230	2.5000e-004	8.1700e-003	6.7400e-003	0.0149	2.2000e-003	6.2000e-003	8.4000e-003	0.0000	21.0088	21.0088	3.6200e-003	0.0000	21.0849
<b>Total</b>	<b>0.4621</b>	<b>4.4708</b>	<b>3.4318</b>	<b>7.3900e-003</b>	<b>0.1637</b>	<b>0.2244</b>	<b>0.3780</b>	<b>0.0412</b>	<b>0.2084</b>	<b>0.2496</b>	<b>0.0000</b>	<b>646.5184</b>	<b>646.5184</b>	<b>0.1334</b>	<b>0.0000</b>	<b>649.3190</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

**2.2 Overall Operational**

**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.6062	2.0000e-005	1.6400e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	3.1500e-003	3.1500e-003	1.0000e-005	0.0000	3.3300e-003
Energy	0.0129	0.1171	0.0984	7.0000e-004		8.9000e-003	8.9000e-003		8.9000e-003	8.9000e-003	0.0000	585.4147	585.4147	0.0226	6.5000e-003	587.9044
Mobile	1.6000e-004	2.0500e-003	2.3200e-003	1.0000e-005	1.4000e-004	3.0000e-005	1.7000e-004	4.0000e-005	3.0000e-005	7.0000e-005	0.0000	0.5264	0.5264	0.0000	0.0000	0.5265
Waste						0.0000	0.0000		0.0000	0.0000	31.9670	0.0000	31.9670	1.8892	0.0000	71.6401
Water						0.0000	0.0000		0.0000	0.0000	9.3174	109.4332	118.7506	0.9620	0.0236	146.2803
Total	0.6193	0.1192	0.1023	7.1000e-004	1.4000e-004	8.9400e-003	9.0800e-003	4.0000e-005	8.9400e-003	8.9800e-003	41.2844	675.3775	716.6619	2.8738	0.0301	786.3547

**2.2 Overall Operational**

**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.6062	2.0000e-005	1.8400e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	3.1500e-003	3.1500e-003	1.0000e-005	0.0000	3.3300e-003
Energy	0.0129	0.1171	0.0984	7.0000e-004		8.9000e-003	8.9000e-003		8.9000e-003	8.9000e-003	0.0000	585.4147	585.4147	0.0226	6.5000e-003	567.9044
Mobile	1.6000e-004	2.0500e-003	2.3200e-003	1.0000e-005	1.4000e-004	3.0000e-005	1.7000e-004	4.0000e-005	3.0000e-005	7.0000e-005	0.0000	0.5264	0.5264	0.0000	0.0000	0.5265
Waste						0.0000	0.0000		0.0000	0.0000	31.9870	0.0000	31.9870	1.8892	0.0000	71.8401
Water						0.0000	0.0000		0.0000	0.0000	9.3174	109.4332	118.7506	0.9618	0.0236	146.2655
<b>Total</b>	<b>0.6193</b>	<b>0.1192</b>	<b>0.1023</b>	<b>7.1000e-004</b>	<b>1.4000e-004</b>	<b>8.9400e-003</b>	<b>9.0800e-003</b>	<b>4.0000e-005</b>	<b>8.9400e-003</b>	<b>8.9800e-003</b>	<b>41.2844</b>	<b>676.3775</b>	<b>716.6619</b>	<b>2.8736</b>	<b>0.0301</b>	<b>786.3398</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Percent Reduction</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.01</b>	<b>0.13</b>	<b>0.00</b>

**3.0 Construction Detail**

**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Pipeline	Trenching	7/1/2016	4/3/2017	5	197	
2	Demolition-Existing Facility	Demolition	1/1/2017	1/27/2017	5	20	
3	AWTF	Building Construction	1/1/2017	1/31/2018	5	283	
4	Booster Pump Station	Building Construction	1/1/2017	6/30/2017	5	130	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0 (Architectural Coating – sqft)

**OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
AWTF	Plate Compactors	1	8.00	84	0.74
AWTF	Cranes	1	8.00	226	0.29
AWTF	Tractors/Loaders/Backhoes	1	7.00	89	0.20
Pipeline	Welders	1	8.00	174	0.41
Booster Pump Station	Excavators	1	8.00	255	0.40
AWTF	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Demolition-Existing Facility	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Booster Pump Station	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Pipeline	Rollers	1	8.00	80	0.38
Pipeline	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Booster Pump Station	Plate Compactors	1	8.00	174	0.41
Pipeline	Plate Compactors	1	8.00	8	0.43
Pipeline	Excavators	1	8.00	361	0.48
AWTF	Off-Highway Trucks	2	6.00	46	0.45

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition-Existing Facility	3	8.00	0.00	46.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Pipeline	5	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Booster Pump Station	3	53.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
AWTF	6	53.00	21.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

**3.1 Mitigation Measures Construction**

**3.2 Pipeline - 2016**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1267	1.2952	0.7870	1.8500e-003		0.0649	0.0649		0.0612	0.0612	0.0000	168.9303	168.9303	0.0410	0.0000	169.7902
<b>Total</b>	<b>0.1267</b>	<b>1.2952</b>	<b>0.7870</b>	<b>1.8500e-003</b>		<b>0.0649</b>	<b>0.0649</b>		<b>0.0612</b>	<b>0.0612</b>	<b>0.0000</b>	<b>168.9303</b>	<b>168.9303</b>	<b>0.0410</b>	<b>0.0000</b>	<b>169.7902</b>

**3.2 Pipeline - 2016**

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr										MT/yr						
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.4200e-003	5.0300e-003	0.0523	1.1000e-004	9.3400e-003	8.0000e-005	9.4200e-003	2.4800e-003	7.0000e-005	2.5500e-003	0.0000	8.7524	8.7524	4.7000e-004	0.0000	8.7623	8.7623
<b>Total</b>	<b>3.4200e-003</b>	<b>5.0300e-003</b>	<b>0.0523</b>	<b>1.1000e-004</b>	<b>9.3400e-003</b>	<b>8.0000e-005</b>	<b>9.4200e-003</b>	<b>2.4800e-003</b>	<b>7.0000e-005</b>	<b>2.5500e-003</b>	<b>0.0000</b>	<b>8.7524</b>	<b>8.7524</b>	<b>4.7000e-004</b>	<b>0.0000</b>	<b>8.7623</b>	<b>8.7623</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1267	1.2952	0.7870	1.8500e-003		0.0649	0.0649		0.0612	0.0612	0.0000	168.9301	168.9301	0.0410	0.0000	169.7900
<b>Total</b>	<b>0.1267</b>	<b>1.2952</b>	<b>0.7870</b>	<b>1.8500e-003</b>		<b>0.0649</b>	<b>0.0649</b>		<b>0.0612</b>	<b>0.0612</b>	<b>0.0000</b>	<b>168.9301</b>	<b>168.9301</b>	<b>0.0410</b>	<b>0.0000</b>	<b>169.7900</b>

**3.2 Pipeline - 2016**

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr										MT/yr						
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.4200e-003	5.0300e-003	0.0523	1.1000e-004	9.3400e-003	8.0000e-005	9.4200e-003	2.4800e-003	7.0000e-005	2.5500e-003	0.0000	8.7524	8.7524	4.7000e-004	0.0000	8.7623	8.7623
<b>Total</b>	<b>3.4200e-003</b>	<b>5.0300e-003</b>	<b>0.0523</b>	<b>1.1000e-004</b>	<b>9.3400e-003</b>	<b>8.0000e-005</b>	<b>9.4200e-003</b>	<b>2.4800e-003</b>	<b>7.0000e-005</b>	<b>2.5500e-003</b>	<b>0.0000</b>	<b>8.7524</b>	<b>8.7524</b>	<b>4.7000e-004</b>	<b>0.0000</b>	<b>8.7623</b>	<b>8.7623</b>

**3.2 Pipeline - 2017**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0591	0.5915	0.3915	9.3000e-004		0.0296	0.0296		0.0278	0.0278	0.0000	84.1562	84.1562	0.0205	0.0000	84.5865
<b>Total</b>	<b>0.0591</b>	<b>0.5915</b>	<b>0.3915</b>	<b>9.3000e-004</b>		<b>0.0296</b>	<b>0.0296</b>		<b>0.0278</b>	<b>0.0278</b>	<b>0.0000</b>	<b>84.1562</b>	<b>84.1562</b>	<b>0.0205</b>	<b>0.0000</b>	<b>84.5865</b>



**3.2 Pipeline - 2017**

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.5400e-003	2.2900e-003	0.0237	6.0000e-005	4.7100e-003	4.0000e-005	4.7500e-003	1.2500e-003	4.0000e-005	1.2900e-003	0.0000	4.2403	4.2403	2.2000e-004	0.0000	4.2449
<b>Total</b>	<b>1.5400e-003</b>	<b>2.2900e-003</b>	<b>0.0237</b>	<b>6.0000e-005</b>	<b>4.7100e-003</b>	<b>4.0000e-005</b>	<b>4.7500e-003</b>	<b>1.2500e-003</b>	<b>4.0000e-005</b>	<b>1.2900e-003</b>	<b>0.0000</b>	<b>4.2403</b>	<b>4.2403</b>	<b>2.2000e-004</b>	<b>0.0000</b>	<b>4.2449</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0581	0.5915	0.3915	9.3000e-004		0.0298	0.0298		0.0278	0.0278	0.0000	84.1561	84.1561	0.0205	0.0000	84.5864
<b>Total</b>	<b>0.0581</b>	<b>0.5915</b>	<b>0.3915</b>	<b>9.3000e-004</b>		<b>0.0298</b>	<b>0.0298</b>		<b>0.0278</b>	<b>0.0278</b>	<b>0.0000</b>	<b>84.1561</b>	<b>84.1561</b>	<b>0.0205</b>	<b>0.0000</b>	<b>84.5864</b>

**3.2 Pipeline - 2017**

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr										MT/yr						
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.5400e-003	2.2900e-003	0.0237	6.0000e-005	4.7100e-003	4.0000e-005	4.7500e-003	1.2500e-003	4.0000e-005	1.2900e-003	0.0000	4.2403	4.2403	2.2000e-004	0.0000	4.2449	4.2449
<b>Total</b>	<b>1.5400e-003</b>	<b>2.2900e-003</b>	<b>0.0237</b>	<b>6.0000e-005</b>	<b>4.7100e-003</b>	<b>4.0000e-005</b>	<b>4.7500e-003</b>	<b>1.2500e-003</b>	<b>4.0000e-005</b>	<b>1.2900e-003</b>	<b>0.0000</b>	<b>4.2403</b>	<b>4.2403</b>	<b>2.2000e-004</b>	<b>0.0000</b>	<b>4.2449</b>	<b>4.2449</b>

**3.3 Demolition-Exsiting Facility - 2017**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr										MT/yr						
Off-Road	9.5000e-003	0.0913	0.0718	9.0000e-005		6.8700e-003	6.8700e-003		6.3200e-003	6.3200e-003	0.0000	8.6618	8.6618	2.6500e-003	0.0000	8.7175	8.7175
<b>Total</b>	<b>9.5000e-003</b>	<b>0.0913</b>	<b>0.0718</b>	<b>9.0000e-005</b>		<b>6.8700e-003</b>	<b>6.8700e-003</b>		<b>6.3200e-003</b>	<b>6.3200e-003</b>	<b>0.0000</b>	<b>8.6618</b>	<b>8.6618</b>	<b>2.6500e-003</b>	<b>0.0000</b>	<b>8.7175</b>	<b>8.7175</b>

**3.3 Demolition-Exsiting Facility - 2017**  
**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	3.9000e-004	6.0900e-003	4.8400e-003	2.0000e-005	3.9000e-004	9.0000e-005	4.9000e-004	1.1000e-004	8.0000e-005	1.9000e-004	0.0000	1.5236	1.5236	1.0000e-005	0.0000	1.5239
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.9000e-004	4.3000e-004	4.4300e-003	1.0000e-005	8.8000e-004	1.0000e-005	8.8000e-004	2.3000e-004	1.0000e-005	2.4000e-004	0.0000	0.7907	0.7907	4.0000e-005	0.0000	0.7916
<b>Total</b>	<b>6.8000e-004</b>	<b>6.6200e-003</b>	<b>9.2700e-003</b>	<b>3.0000e-005</b>	<b>1.2700e-003</b>	<b>1.0000e-004</b>	<b>1.3700e-003</b>	<b>3.4000e-004</b>	<b>9.0000e-005</b>	<b>4.3000e-004</b>	<b>0.0000</b>	<b>2.3144</b>	<b>2.3144</b>	<b>5.0000e-005</b>	<b>0.0000</b>	<b>2.3154</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	9.5000e-003	0.0913	0.0718	9.0000e-005		6.8700e-003	6.8700e-003		6.3200e-003	6.3200e-003	0.0000	8.6617	8.6617	2.6500e-003	0.0000	8.7175
<b>Total</b>	<b>9.5000e-003</b>	<b>0.0913</b>	<b>0.0718</b>	<b>9.0000e-005</b>		<b>6.8700e-003</b>	<b>6.8700e-003</b>		<b>6.3200e-003</b>	<b>6.3200e-003</b>	<b>0.0000</b>	<b>8.6617</b>	<b>8.6617</b>	<b>2.6500e-003</b>	<b>0.0000</b>	<b>8.7175</b>

**3.3 Demolition-Exsiting Facility - 2017**

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	3.9000e-004	6.0900e-003	4.8400e-003	2.0000e-005	3.9000e-004	9.0000e-005	4.9000e-004	1.1000e-004	8.0000e-005	1.9000e-004	0.0000	1.5238	1.5238	1.0000e-005	0.0000	1.5239
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.9000e-004	4.3000e-004	4.4300e-003	1.0000e-005	8.8000e-004	1.0000e-005	8.8000e-004	2.3000e-004	1.0000e-005	2.4000e-004	0.0000	0.7907	0.7907	4.0000e-005	0.0000	0.7916
<b>Total</b>	<b>6.8000e-004</b>	<b>6.5200e-003</b>	<b>9.2700e-003</b>	<b>3.0000e-005</b>	<b>1.2700e-003</b>	<b>1.0000e-004</b>	<b>1.3700e-003</b>	<b>3.4000e-004</b>	<b>9.0000e-005</b>	<b>4.3000e-004</b>	<b>0.0000</b>	<b>2.3144</b>	<b>2.3144</b>	<b>5.0000e-005</b>	<b>0.0000</b>	<b>2.3154</b>

**3.4 AWTF - 2017**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1433	1.5675	0.8046	1.3100e-003		0.0873	0.0873		0.0803	0.0803	0.0000	121.8988	121.8988	0.0374	0.0000	122.8832
<b>Total</b>	<b>0.1433</b>	<b>1.5675</b>	<b>0.8046</b>	<b>1.3100e-003</b>		<b>0.0873</b>	<b>0.0873</b>		<b>0.0803</b>	<b>0.0803</b>	<b>0.0000</b>	<b>121.8988</b>	<b>121.8988</b>	<b>0.0374</b>	<b>0.0000</b>	<b>122.8832</b>

**3.4 AWTF - 2017**

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0221	0.2242	0.3011	5.9000e-004	0.0168	3.4800e-003	0.0203	4.8000e-003	3.2000e-003	7.9900e-003	0.0000	52.9352	52.9352	3.8000e-004	0.0000	52.9431
Worker	0.0248	0.0367	0.3813	9.3000e-004	0.0756	6.2000e-004	0.0762	0.0201	5.7000e-004	0.0207	0.0000	68.1015	68.1015	3.5200e-003	0.0000	68.1754
<b>Total</b>	<b>0.0469</b>	<b>0.2609</b>	<b>0.6824</b>	<b>1.5200e-003</b>	<b>0.0924</b>	<b>4.1000e-003</b>	<b>0.0965</b>	<b>0.0248</b>	<b>3.7700e-003</b>	<b>0.0286</b>	<b>0.0000</b>	<b>121.0366</b>	<b>121.0366</b>	<b>3.9000e-003</b>	<b>0.0000</b>	<b>121.1185</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1433	1.5875	0.8046	1.3100e-003		0.0873	0.0873		0.0803	0.0803	0.0000	121.8987	121.8987	0.0374	0.0000	122.8830
<b>Total</b>	<b>0.1433</b>	<b>1.5875</b>	<b>0.8046</b>	<b>1.3100e-003</b>		<b>0.0873</b>	<b>0.0873</b>		<b>0.0803</b>	<b>0.0803</b>	<b>0.0000</b>	<b>121.8987</b>	<b>121.8987</b>	<b>0.0374</b>	<b>0.0000</b>	<b>122.8830</b>

**3.4 AWTF - 2017**

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr										MT/yr						
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0221	0.2242	0.3011	5.9000e-004	0.0168	3.4800e-003	0.0203	4.8000e-003	3.2000e-003	7.9900e-003	0.0000	52.9352	52.9352	3.8000e-004	0.0000	52.9431	
Worker	0.0248	0.0367	0.3813	9.3000e-004	0.0756	6.2000e-004	0.0762	0.0201	5.7000e-004	0.0207	0.0000	68.1015	68.1015	3.5200e-003	0.0000	68.1754	
<b>Total</b>	<b>0.0469</b>	<b>0.2609</b>	<b>0.6824</b>	<b>1.5200e-003</b>	<b>0.0924</b>	<b>4.1000e-003</b>	<b>0.0965</b>	<b>0.0248</b>	<b>3.7700e-003</b>	<b>0.0286</b>	<b>0.0000</b>	<b>121.0366</b>	<b>121.0366</b>	<b>3.9000e-003</b>	<b>0.0000</b>	<b>121.1185</b>	

**3.4 AWTF - 2018**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0108	0.1201	0.0669	1.2000e-004		6.3900e-003	6.3900e-003		5.8800e-003	5.8800e-003	0.0000	10.6052	10.6052	3.3000e-003	0.0000	10.6745
<b>Total</b>	<b>0.0108</b>	<b>0.1201</b>	<b>0.0669</b>	<b>1.2000e-004</b>		<b>6.3900e-003</b>	<b>6.3900e-003</b>		<b>5.8800e-003</b>	<b>5.8800e-003</b>	<b>0.0000</b>	<b>10.6052</b>	<b>10.6052</b>	<b>3.3000e-003</b>	<b>0.0000</b>	<b>10.6745</b>

**3.4 AWTF - 2018**

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.8300e-003	0.0182	0.0255	5.0000e-005	1.4900e-003	2.9000e-004	1.7800e-003	4.2000e-004	2.7000e-004	6.9000e-004	0.0000	4.6041	4.6041	3.0000e-005	0.0000	4.6048
Worker	1.9700e-003	2.9500e-003	0.0305	8.0000e-005	6.6900e-003	5.0000e-005	6.7400e-003	1.7800e-003	5.0000e-005	1.8300e-003	0.0000	5.7995	5.7995	2.9000e-004	0.0000	5.8056
<b>Total</b>	<b>3.8000e-003</b>	<b>0.0211</b>	<b>0.0561</b>	<b>1.3000e-004</b>	<b>8.1800e-003</b>	<b>3.4000e-004</b>	<b>8.5200e-003</b>	<b>2.2000e-003</b>	<b>3.2000e-004</b>	<b>2.5200e-003</b>	<b>0.0000</b>	<b>10.4036</b>	<b>10.4036</b>	<b>3.2000e-004</b>	<b>0.0000</b>	<b>10.4104</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0108	0.1201	0.0669	1.2000e-004		6.3900e-003	6.3900e-003		5.8800e-003	5.8800e-003	0.0000	10.6052	10.6052	3.3000e-003	0.0000	10.6745
<b>Total</b>	<b>0.0108</b>	<b>0.1201</b>	<b>0.0669</b>	<b>1.2000e-004</b>		<b>6.3900e-003</b>	<b>6.3900e-003</b>		<b>5.8800e-003</b>	<b>5.8800e-003</b>	<b>0.0000</b>	<b>10.6052</b>	<b>10.6052</b>	<b>3.3000e-003</b>	<b>0.0000</b>	<b>10.6745</b>

**3.4 AWTF - 2018**

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.8300e-003	0.0182	0.0255	5.0000e-005	1.4900e-003	2.9000e-004	1.7800e-003	4.2000e-004	2.7000e-004	6.9000e-004	0.0000	4.6041	4.6041	3.0000e-005	0.0000	4.6048
Worker	1.9700e-003	2.9500e-003	0.0305	8.0000e-005	6.6900e-003	5.0000e-005	6.7400e-003	1.7800e-003	5.0000e-005	1.8300e-003	0.0000	5.7995	5.7995	2.9000e-004	0.0000	5.8056
<b>Total</b>	<b>3.8000e-003</b>	<b>0.0211</b>	<b>0.0561</b>	<b>1.3000e-004</b>	<b>8.1800e-003</b>	<b>3.4000e-004</b>	<b>8.5200e-003</b>	<b>2.2000e-003</b>	<b>3.2000e-004</b>	<b>2.6200e-003</b>	<b>0.0000</b>	<b>10.4036</b>	<b>10.4036</b>	<b>3.2000e-004</b>	<b>0.0000</b>	<b>10.4104</b>

**3.5 Booster Pump Station - 2017**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0440	0.4910	0.2958	7.7000e-004		0.0244	0.0244		0.0224	0.0224	0.0000	71.4687	71.4687	0.0219	0.0000	71.9286
<b>Total</b>	<b>0.0440</b>	<b>0.4910</b>	<b>0.2958</b>	<b>7.7000e-004</b>		<b>0.0244</b>	<b>0.0244</b>		<b>0.0224</b>	<b>0.0224</b>	<b>0.0000</b>	<b>71.4687</b>	<b>71.4687</b>	<b>0.0219</b>	<b>0.0000</b>	<b>71.9286</b>



**3.5 Booster Pump Station - 2017**

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0124	0.0184	0.1908	4.6000e-004	3.0378	3.1000e-004	0.0381	0.0100	2.9000e-004	0.0103	0.0000	34.0507	34.0507	1.7600e-003	0.0000	34.0877
<b>Total</b>	<b>0.0124</b>	<b>0.0184</b>	<b>0.1908</b>	<b>4.6000e-004</b>	<b>3.0378</b>	<b>3.1000e-004</b>	<b>0.0381</b>	<b>0.0100</b>	<b>2.9000e-004</b>	<b>0.0103</b>	<b>0.0000</b>	<b>34.0507</b>	<b>34.0507</b>	<b>1.7600e-003</b>	<b>0.0000</b>	<b>34.0877</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0440	0.4910	0.2958	7.7000e-004		0.0244	0.0244		0.0224	0.0224	0.0000	71.4686	71.4686	0.0219	0.0000	71.9285
<b>Total</b>	<b>0.0440</b>	<b>0.4910</b>	<b>0.2958</b>	<b>7.7000e-004</b>		<b>0.0244</b>	<b>0.0244</b>		<b>0.0224</b>	<b>0.0224</b>	<b>0.0000</b>	<b>71.4686</b>	<b>71.4686</b>	<b>0.0219</b>	<b>0.0000</b>	<b>71.9285</b>

**3.5 Booster Pump Station - 2017**

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0124	0.0184	0.1906	4.8000e-004	0.0378	3.1000e-004	0.0381	0.0100	2.9000e-004	0.0103	0.0000	34.0507	34.0507	1.7600e-003	0.0000	34.0877
<b>Total</b>	<b>0.0124</b>	<b>0.0184</b>	<b>0.1906</b>	<b>4.8000e-004</b>	<b>0.0378</b>	<b>3.1000e-004</b>	<b>0.0381</b>	<b>0.0100</b>	<b>2.9000e-004</b>	<b>0.0103</b>	<b>0.0000</b>	<b>34.0507</b>	<b>34.0507</b>	<b>1.7600e-003</b>	<b>0.0000</b>	<b>34.0877</b>

**4.0 Operational Detail - Mobile**

**4.1 Mitigation Measures Mobile**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.6000e-004	2.0500e-003	2.3200e-003	1.0000e-005	1.4000e-004	3.0000e-005	1.7000e-004	4.0000e-005	3.0000e-005	7.0000e-005	0.0000	0.5264	0.5264	0.0000	0.0000	0.5265
Unmitigated	1.6000e-004	2.0500e-003	2.3200e-003	1.0000e-005	1.4000e-004	3.0000e-005	1.7000e-004	4.0000e-005	3.0000e-005	7.0000e-005	0.0000	0.5264	0.5264	0.0000	0.0000	0.5265

**4.2 Trip Summary Information**

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Manufacturing	0.10	0.00	0.00	321	321
Total	0.10	0.00	0.00	321	321

**4.3 Trip Type Information**

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Manufacturing	16.60	8.40	6.90	59.00	28.00	13.00	92	5	3

LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	1.000000	0.000000	0.000000	0.000000	0.000000	0.000000

**5.0 Energy Detail**

~~5.1 Fleet Mix~~

Historical Energy Use: N

**5.1 Mitigation Measures Energy**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	437.9355	437.9355	0.0201	4.1600e-003	439.8494
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	437.9355	437.9355	0.0201	4.1600e-003	439.8494
NaturalGas Mitigated	0.0129	0.1171	0.0984	7.0000e-004		8.9000e-003	8.9000e-003		8.9000e-003	8.9000e-003	0.0000	127.4792	127.4792	2.4400e-003	2.3400e-003	128.2550
NaturalGas Unmitigated	0.0129	0.1171	0.0984	7.0000e-004		8.9000e-003	8.9000e-003		8.9000e-003	8.9000e-003	0.0000	127.4792	127.4792	2.4400e-003	2.3400e-003	128.2550

**5.2 Energy by Land Use - NaturalGas**

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	KBTU/yr	tons/yr										MT/yr					
Manufacturing	2.38887e+006	0.0129	0.1171	0.0984	7.0000e-004		8.9000e-003	8.9000e-003		8.9000e-003	8.9000e-003	0.0000	127.4792	127.4792	2.4400e-003	2.3400e-003	128.2550
<b>Total</b>		<b>0.0129</b>	<b>0.1171</b>	<b>0.0984</b>	<b>7.0000e-004</b>		<b>8.9000e-003</b>	<b>8.9000e-003</b>		<b>8.9000e-003</b>	<b>8.9000e-003</b>	<b>0.0000</b>	<b>127.4792</b>	<b>127.4792</b>	<b>2.4400e-003</b>	<b>2.3400e-003</b>	<b>128.2550</b>

**5.2 Energy by Land Use - NaturalGas**

**Mitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Manufacturing	2.38887e+006	0.0129	0.1171	0.0984	7.0000e-004		8.9000e-003	8.9000e-003		8.9000e-003	8.9000e-003	0.0000	127.4792	127.4792	2.4400e-003	2.3400e-003	128.2550
<b>Total</b>		<b>0.0129</b>	<b>0.1171</b>	<b>0.0984</b>	<b>7.0000e-004</b>		<b>8.9000e-003</b>	<b>8.9000e-003</b>		<b>8.9000e-003</b>	<b>8.9000e-003</b>	<b>0.0000</b>	<b>127.4792</b>	<b>127.4792</b>	<b>2.4400e-003</b>	<b>2.3400e-003</b>	<b>128.2550</b>

**5.3 Energy by Land Use - Electricity**

**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Manufacturing	1.53035e+006	437.9355	0.0201	4.1600e-003	439.6494
<b>Total</b>		<b>437.9355</b>	<b>0.0201</b>	<b>4.1600e-003</b>	<b>439.6494</b>

### 5.3 Energy by Land Use - Electricity

#### Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Manufacturing	1.53035e+006	437.9355	0.0201	4.1600e-003	439.6494
<b>Total</b>		<b>437.9355</b>	<b>0.0201</b>	<b>4.1600e-003</b>	<b>439.6494</b>

### 6.0 Area Detail

#### 6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.6062	2.0000e-005	1.6400e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	3.1500e-003	3.1500e-003	1.0000e-005	0.0000	3.3300e-003
Unmitigated	0.6062	2.0000e-005	1.6400e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	3.1500e-003	3.1500e-003	1.0000e-005	0.0000	3.3300e-003

**6.2 Area by SubCategory**

**Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.1472					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.4589					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.6000e-004	2.0000e-005	1.6400e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	3.1500e-003	3.1500e-003	1.0000e-005	0.0000	3.3300e-003
<b>Total</b>	<b>0.6062</b>	<b>2.0000e-005</b>	<b>1.6400e-003</b>	<b>0.0000</b>		<b>1.0000e-005</b>	<b>1.0000e-005</b>		<b>1.0000e-005</b>	<b>1.0000e-005</b>	<b>0.0000</b>	<b>3.1500e-003</b>	<b>3.1500e-003</b>	<b>1.0000e-005</b>	<b>0.0000</b>	<b>3.3300e-003</b>

**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.1472					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.4589					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.6000e-004	2.0000e-005	1.6400e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	3.1500e-003	3.1500e-003	1.0000e-005	0.0000	3.3300e-003
<b>Total</b>	<b>0.6062</b>	<b>2.0000e-005</b>	<b>1.6400e-003</b>	<b>0.0000</b>		<b>1.0000e-005</b>	<b>1.0000e-005</b>		<b>1.0000e-005</b>	<b>1.0000e-005</b>	<b>0.0000</b>	<b>3.1500e-003</b>	<b>3.1500e-003</b>	<b>1.0000e-005</b>	<b>0.0000</b>	<b>3.3300e-003</b>

**7.0 Water Detail**

**7.1 Mitigation Measures Water**

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	118.7506	0.9618	0.0236	146.2855
Unmitigated	118.7506	0.9620	0.0236	146.2803

**7.2 Water by Land Use**

**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Manufacturing	29.3687 / 0	118.7506	0.9620	0.0236	146.2803
<b>Total</b>		<b>118.7506</b>	<b>0.9620</b>	<b>0.0236</b>	<b>146.2803</b>



### 7.2 Water by Land Use

#### Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Manufacturing	29,3687 / 0	118.7506	0.9618	0.0236	146.2655
<b>Total</b>		<b>118.7506</b>	<b>0.9618</b>	<b>0.0236</b>	<b>146.2655</b>

### 8.0 Waste Detail

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#### 8.1 Mitigation Measures Waste

##### Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	31.9670	1.8892	0.0000	71.6401
Unmitigated	31.9670	1.8892	0.0000	71.6401

### 8.2 Waste by Land Use

#### Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Manufacturing	157.48	31.9670	1.8892	0.0000	71.6401
<b>Total</b>		<b>31.9670</b>	<b>1.8892</b>	<b>0.0000</b>	<b>71.6401</b>

#### Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Manufacturing	157.48	31.9670	1.8892	0.0000	71.6401
<b>Total</b>		<b>31.9670</b>	<b>1.8892</b>	<b>0.0000</b>	<b>71.6401</b>

### 9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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## 10.0 Vegetation

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**APPENDIX B**



## GABRIELEÑO BAND OF MISSION INDIANS - KIZH NATION

Historically known as The San Gabriel Band of Mission Indians  
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

RE: AB52 consultation response for the Pomona Intertie Project

Dear Sylvia Lee  
Manager of Planning & Environmental Resources

May 4, 2016

Please find this letter in response to your request for consultation dated April 7, 2016. I have reviewed the project site and do have concerns for cultural resources. Your project lies in an area where the Ancestral territories of the Kizh (Kitc) Gabrieleño's villages adjoined and overlapped with each other, at least during the Late Prehistoric and Protohistoric Periods. The homeland of the Kizh Gabrieleño was probably the most influential Native American group in aboriginal southern California (Bean and Smith 1978a:538), was centered in the Los Angeles Basin, and reached as far east as the San Bernardino-Riverside area. The homeland of our neighbors the Serranos was primarily the San Bernardino Mountains, including the slopes and lowlands on the north and south flanks. Whatever the linguistic affiliation, Native Americans in and around the project area exhibited similar organization and resource procurement strategies. Villages were based on clan or lineage groups. Their home/ base sites are marked by midden deposits often with bedrock mortars. During their seasonal rounds to exploit plant resources, small groups would migrate within their traditional territory in search of specific plants and animals. Their gathering strategies often left behind signs of special use sites, usually grinding slicks on bedrock boulders, at the locations of the resources.

Due to the project location and the high sensitivity of the area location, we would like to request one of our certified Native American Monitor to be on site during any and all ground disturbances (including but not limited to pavement removal, post holing, auguring, boring, grading, excavation and trenching) to protect any cultural resources which may be effected during construction or development. In all cases, when the Native American Heritage Commission states there are "no records of sacred sites in the project area" the NAHC will always refer lead agencies to the respective Native American Tribe because the NAHC is only aware of general information and are not the experts on each California Tribe. Our Elder Committee & Tribal Historians are the experts for our Tribe and are able to provide a more complete history (both written and oral) regarding the location of historic villages, trade routes, cemeteries and sacred/religious sites in the project area. While the property may be located in an area that has been previously developed, numerous examples can be shared to show that there still is a possibility that unknown, yet significant, cultural resources will be encountered during ground disturbance activities. Please note, if they haven't been listed with the NAHC, it doesn't mean that they aren't there. Not everyone reports what they know.

The recent implementation of AB52 dictates that lead agencies consult with Native American Tribes who can prove and document traditional and cultural affiliation with the area of said project in order to protect cultural resources. However our tribe is connected Ancestrally to this project location area, what does Ancestrally or Ancestral mean? The people who were in your family in past times, Of, belonging to, inherited from, or denoting an ancestor or ancestors <http://www.thefreedictionary.com/ancestral>. Our priorities are to avoid and protect without delay or conflicts – to consult with you to avoid unnecessary destruction of cultural and biological resources, but also to protect what resources still exist at the project site for the benefit and education of future generations.

CC: NAHC

With respect,

Andrew Salas, Chairman  
cell (626)926-4131

Andrew Salas, Chairman  
Albert Perez, treasurer I

Nadine Salas, Vice-Chairman  
Martha Gonzalez Lemos, treasurer II

Christina Swindall Martinez, secretary  
Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

[www.gabrieleñoindians@yahoo.com](mailto:www.gabrieleñoindians@yahoo.com)

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**FINAL MITIGATED  
NEGATIVE DECLARATION**

## ATTACHMENT 2:

# Comments and Responses



## MEMORANDUM

June 22, 2016

From: Tom Dodson

To: Mr. Joshua Aguilar

Subj: Completion of the Mitigated Negative Declaration for the **IEUA Pomona Intertie Project (SCH#2016051051)**

The Inland Empire Utilities Agency (IEUA or Agency) received three written comments on the proposed Mitigated Negative Declaration (MND) for the IEUA Pomona Intertie Project (SCH# 2016051051). CEQA requires a Negative Declaration, in this case with mitigation measures, to consist of the Initial Study, copies of the comments, any responses to comments as compiled on the following pages; and any other project related material prepared to address issues evaluated in the Initial Study or prepared as part of the planning review of the project.

For this project, the original Initial Study will be utilized as one component of the final MND package. The attached responses to comments, combined with the Initial Study and the Mitigation Monitoring and Reporting Program, constitute the final MND package that will be used by IEUA to consider the environmental effects of implementing the proposed project. The following parties submitted comments. These letters are addressed in the attached Responses to Comments:

1. State Office of Planning and Research, State Clearinghouse
2. California Department of Transportation, District 7
3. California State Water Resources Control Board

Because mitigation measures are required for this project to reduce potentially significant impacts to a less than significant level, the Mitigation Monitoring and Reporting Program (MMRP) attached to this package is required to be adopted as part of this final MND package by the Agency Board. Tom Dodson will be attending the public meeting on this project to address any questions that the Agency Board members may have regarding the adoption of the MND for the proposed project. This Initial Study/Mitigated Negative Declaration and the IEUA Pomona Intertie Project will be considered by the Agency Board at its meeting on July 20, 2016. Do not hesitate to give me a call if you have any questions regarding the contents of this package.

A handwritten signature in black ink that reads "Tom Dodson".

Tom Dodson

Attachments





# COMMENT LETTER #1

STATE OF CALIFORNIA

## GOVERNOR'S OFFICE OF PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT



EDMUND G. BROWN JR.  
GOVERNOR

KEN ALLEN  
DIRECTOR

June 15, 2016

Sylvie Lee  
Inland Empire Utility Agency  
6075 Kimball Avenue  
Chino, CA 91708

Subject: IEUA Pomona Intertie Project  
SCH#: 2016051051

Dear Sylvie Lee:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on June 14, 2016, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

1 - 1

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures

cc: Resources Agency

**RESPONSES TO COMMENTS  
LETTER #1  
OFFICE OF PLANNING AND RESEARCH, STATE CLEARINGHOUSE**

- 1-1 This is an acknowledgment letter verifying that the State Clearinghouse submitted the Initial Study and the Notice of Intent to Adopt a Mitigated Negative Declaration to selected state agencies for review, and that one state agency (California Department of Transportation District 7) submitted comments through the Clearinghouse by the close of the review period, which occurred on June 14, 2016. Responses to the District 7 comment letter are provided in responses to comments letter #2. The State assigned this project the following tracking number, SCH #2016051051. This letter is for information only and does not require additional formal response.

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2018061051  
**Project Title** IEUA Pomona Intertie Project  
**Lead Agency** Inland Empire Utilities Agency

**Type** MND Mitigated Negative Declaration

**Description** The proposed project includes the construction of a recycled water pipeline; booster pump station; and advanced water treatment facility. The purpose of the project is to improve the groundwater replenishment system within the IEUA's service area. The project would serve to consolidate wastewater treatment service in the area by maximizing the recovery of water supply from brine sources within the City of Pomona, IEUA, and Monte Vista Water District service areas.

**Lead Agency Contact**

**Name** Sylvie Lee  
**Agency** Inland Empire Utility Agency  
**Phone** 909-993-1600  
**email**  
**Address** 6075 Kimball Avenue  
**City** Chino  
**State** CA **Zip** 91708  
**Fax**

**Project Location**

**County** Los Angeles, San Bernardino  
**City** Pomona, Montclair  
**Region**  
**Lat / Long** 34° 2' N / 117° 28' 36" W  
**Cross Streets** Lincoln Ave/Ramona Ave  
**Parcel No.** 8355017006, 8339020028  
**Township** **Range** **Section** **Base**

**Proximity to:**

**Highways** I 10  
**Airports**  
**Railways**  
**Waterways** San Antonio Creek  
**Schools**  
**Land Use** GPD: Urban Neighborhood, Activity Center, Residential Neighborhood, Low Res, Public/Quasi Public and Conservation Basins  
Z: Light Industrial (M-1), Corridors Specific Plan, Single Family (R-1-8000), Single Family (R-1-7200), and Single Family Res

**Project Issues** Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Public Services; Noise; Recreation/Parks; Soil Erosion/Compaction/Grading; Traffic/Circulation; Toxic/Hazardous; Vegetation; Water Supply; Wetland/Riparian; Wildlife; Landuse

**Reviewing Agencies** Resources Agency; Department of Fish and Wildlife, Region 5; Department of Fish and Wildlife, Region 6; Department of Parks and Recreation; Department of Water Resources; Caltrans, District 7; Caltrans, District 8; Native American Heritage Commission; State Water Resources Control Board, Division of Drinking Water; State Water Resources Control Board, Division of Drinking Water, District 15; State Water Resources Control Board, Division of Drinking Water, District 13; State Water Resources Control Board, Division of Financial Assistance; State Water Resources Control Board, Division of Water Rights; Regional Water Quality Control Board, Region 8; Regional Water Quality Control Board, Region 4

**Date Received** 05/16/2016 **Start of Review** 05/16/2016 **End of Review** 06/14/2016

Note: Blanks in data fields result from insufficient information provided by lead agency.

# COMMENT LETTER #2

STATE OF CALIFORNIA - CALIFORNIA STATE TRANSPORTATION AGENCY

HOMER G. BROWN, Jr., Governor

DEPARTMENT OF TRANSPORTATION  
DISTRICT 7 OFFICE OF TRANSPORTATION PLANNING  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 897-9140  
FAX (213) 897-1937  
www.dot.ca.gov

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Governor's Office of Planning & Research

MAY 26 2016

STATE CLEARINGHOUSE

May 26, 2016

Ms. Sylvie Lee  
Inland Empire Utilities Agency  
6075 Kimball Avenue  
Chino, CA 91708

clear  
06/14/16E

RE: Pomona Interlie Project  
Via LA-10/PM 44.17 to 48.26  
SCH # 2016051051  
IGR/CEQA No. 160540AL-MND

Dear Ms. Lee:

2-1 Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project includes the construction of a recycled water pipeline, booster pump station, and AWER (Advanced Water Treatment Facility).

2-2 Some of the construction work is within State right-of-way, please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standard and specifications.

2-3 Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without a storm water management plan.

2-4 Transportation of heavy construction equipment and/or materials, which requires the use of oversized transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods.

2-4 In addition, a truck/traffic construction management plan is needed for this project. Traffic Management Plans involving lane closures or street detours which will impact the circulation system affecting traffic to and from freeway on/off-ramps should be coordinated with Caltrans.

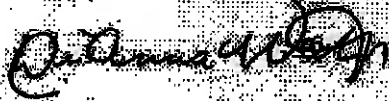
**RESPONSES TO COMMENTS  
LETTER #2  
CALIFORNIA DEPARTMENT OF TRANSPORTATION  
DISTRICT 7 (CALTRANS)**

- 2-1 Your comment is noted and will be retained in the project file that is made available to the Agency decision-makers prior to a decision on the proposed project. IEUA will acquire the appropriate encroachment permits prior to initiating disturbance within any State right-of-way.
- 2-2 Your comment is noted and will be retained in the project file that is made available to the Agency decision-makers prior to a decision on the proposed project. Specific mitigation, measure GEO-1, will be implemented to control surface water runoff and minimize generation of water pollutants.
- 2-3 Your comment is noted and will be retained in the project file that is made available to the Agency decision-makers prior to a decision on the proposed project. IEUA will require its contractor to acquire the appropriate transportation permits prior to delivery of heavy construction equipment and will also direct such deliveries during off-peak commute periods when possible.
- 2-4 Your comment is noted and will be retained in the project file that is made available to the Agency decision-makers prior to a decision on the proposed project. Specific mitigation, measure TR-1, will be implemented to control hazards during construction activities within road rights-of-way.

Ms. Sylvie Lee  
May 26, 2016  
Page 2

2-5 | If you have any questions, please feel free to contact Alan Eng, the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 160540AL.

Sincerely,



DIANNA WATSON  
Branch Chief  
Community Planning & ED IGR Review

cc: Scott Morgan, State Clearinghouse

2-5 Your comment is noted and will be retained in the project file that is made available to the Agency decision-makers prior to a decision on the proposed project. Future communications with District 7 will be submitted with the appropriate project reference and with Mr. Lin.





## COMMENT LETTER #3



### State Water Resources Control Board

JUN 06 2016

Sylvie Lee  
Inland Empire Utilities Agency  
6075 Kimball Avenue  
Chino, CA 91708

Dear Ms. Lee:

**INITIAL STUDY MITIGATED NEGATIVE DECLARATION (IS/MND) FOR INLAND EMPIRE UTILITIES AGENCY (AGENCY); IEUA POMONA INTERTIE PROJECT (PROJECT); SAN BERNARDINO COUNTY; STATE CLEARINGHOUSE NO. 2016051051**

We understand that the Agency may be pursuing Clean Water State Revolving Fund (CWSRF) financing for this Project. As a funding agency and a state agency with jurisdiction by law to preserve, enhance, and restore the quality of California's water resources, the State Water Resources Control Board (State Water Board) is providing the following information on the IS/MND to be prepared for the Project.

The State Water Board, Division of Financial Assistance, is responsible for administering the CWSRF Program. The primary purpose for the CWSRF Program is to implement the Clean Water Act and various state laws by providing financial assistance for wastewater treatment facilities necessary to prevent water pollution, recycle water, correct nonpoint source and storm drainage pollution problems, provide for estuary enhancement, and thereby protect and promote health, safety and welfare of the inhabitants of the state. The CWSRF Program provides low-interest funding equal to one-half of the most recent State General Obligation Bond Rates with a 30-year term. Applications are accepted and processed continuously. Please refer to the State Water Board's CWSRF website at:

[www.waterboards.ca.gov/water\\_issues/programs/grants\\_loans/srf/index.shtml](http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/index.shtml).

The CWSRF Program is partially funded by the United States Environmental Protection Agency and requires additional "CEQA-Plus" environmental documentation and review. Three enclosures are included that further explain the CWSRF Program environmental review process and the additional federal requirements. For the complete environmental application package, please visit:

[http://www.waterboards.ca.gov/water\\_issues/programs/grants\\_loans/srf/srf\\_forms.shtml](http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/srf_forms.shtml). The State Water Board is required to consult directly with agencies responsible for implementing federal environmental laws and regulations. Any environmental issues raised by federal agencies or their representatives will need to be resolved prior to State Water Board approval of a CWSRF financing commitment for the proposed Project. For further information on the CWSRF Program, please contact Mr. Ahmad Kashkoli, at (916) 341-5855.

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

1001 I Street, Sacramento, CA 95814 | Mailing Address: P.O. Box 100, Sacramento, CA 95812-0100 | [www.waterboards.ca.gov](http://www.waterboards.ca.gov)



It is important to note that prior to a CWSRF financing commitment, projects are subject to provisions of the Federal Endangered Species Act (ESA), and must obtain Section 7 clearance from the United States Department of the Interior, Fish and Wildlife Service (USFWS), and/or the United States Department of Commerce National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS) for any potential effects to special-status species.

Please be advised that the State Water Board will consult with the USFWS, and/or the NMFS regarding all federal special-status species that the Project has the potential to impact if the Project is to be financed by the CWSRF Program. The Agency will need to identify whether the Project will involve any direct effects from construction activities, or indirect effects such as growth inducement, that may affect federally listed threatened, endangered, or candidate species that are known, or have a potential to occur in the Project site, in the surrounding areas, or in the service area, and to identify applicable conservation measures to reduce such effects.

In addition, CWSRF projects must comply with federal laws pertaining to cultural resources, specifically Section 106 of the National Historic Preservation Act (Section 106). The State Water Board has responsibility for ensuring compliance with Section 106, and must consult directly with the California State Historic Preservation Officer (SHPO). SHPO consultation is initiated when sufficient information is provided by the CWSRF applicant. If the Agency decides to pursue CWSRF financing, please retain a consultant that meets the Secretary of the Interior's Professional Qualifications Standards ([http://www.nps.gov/history/local-law/arch\\_stnds\\_9.htm](http://www.nps.gov/history/local-law/arch_stnds_9.htm)) to prepare a Section 106 compliance report.

3-1  
cont.

Note that the Agency will need to identify the Area of Potential Effects (APE), including construction and staging areas, and the depth of any excavation. The APE is three-dimensional and includes all areas that may be affected by the Project. The APE includes the surface area and extends below ground to the depth of any Project excavations. The records search request should extend to a ¼-mile beyond Project APE. The appropriate area varies for different projects but should be drawn large enough to provide information on what types of sites may exist in the vicinity.

Other federal environmental requirements pertinent to the Project under the CWSRF Program include the following (for a complete list of all federal requirements please visit: [http://www.waterboards.ca.gov/water\\_issues/programs/grants\\_loans/srf/docs/forms/application\\_environmental\\_package.pdf](http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/docs/forms/application_environmental_package.pdf)):

- A. An alternative analysis discussing environmental impacts of the project in either the CEQA document (Negative Declaration, Mitigated Negative Declaration or Environmental Impact Report) or in a separate report.
- B. A public meeting or hearing for adoption/certification of all environmental documents, except for those with little to no environmental impacts.

**RESPONSES TO COMMENTS  
LETTER #3  
STATE WATER RESOURCES CONTROL BOARD**

- 3-1 IEUA may pursue funding through the State Board for CWSRF in the future, and the Initial Study/Mitigated Negative Declaration (IS/MND) was prepared under this assumption. As the State Board is aware, IEUA is very familiar with the CWSRF CEQA-Plus environmental requirements and when CWSRF funding is considered in the future, the appropriate documentation to comply with the State Board's CEQA-Plus program will be compiled and submitted..

3-1  
cont.

- C. Compliance with the Federal Clean Air Act: (a) Provide air quality studies that may have been done for the Project; and (b) if the Project is in a nonattainment area or attainment area subject to a maintenance plan; (i) provide a summary of the estimated emissions (in tons per year) that are expected from both the construction and operation of the Project for each federal criteria pollutant in a nonattainment or maintenance area, and indicate if the nonattainment designation is moderate, serious, or severe (if applicable); (ii) if emissions are above the federal de minimis levels, but the Project is sized to meet only the needs of current population projections that are used in the approved State Implementation Plan for air quality, quantitatively indicate how the proposed capacity increase was calculated using population projections.**
- D. Compliance with the Coastal Zone Management Act: Identify whether the Project is within a coastal zone and the status of any coordination with the California Coastal Commission.**
- E. Protection of Wetlands: Identify any portion of the proposed Project area that should be evaluated for wetlands or United States waters delineation by the United States Army Corps of Engineers (USACE), or requires a permit from the USACE, and identify the status of coordination with the USACE.**
- F. Compliance with the Farmland Protection Policy Act: Identify whether the Project will result in the conversion of farmland. State the status of farmland (Prime, Unique, or Local and Statewide Importance) in the Project area and determine if this area is under a Williamson Act Contract.**
- G. Compliance with the Migratory Bird Treaty Act: List any birds protected under this act that may be impacted by the Project and identify conservation measures to minimize impacts.**
- H. Compliance with the Flood Plain Management Act: Identify whether or not the Project is in a Flood Management Zone and include a copy of the Federal Emergency Management Agency flood zone maps for the area.**
- I. Compliance with the Wild and Scenic Rivers Act: Identify whether or not any Wild and Scenic Rivers would be potentially impacted by the Project and include conservation measures to minimize such impacts.**

Following are specific comments on the Agency's draft IS/MND:

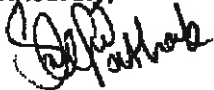
- 3-2 • On page 16, please check the appropriate box under Air Quality - point b (Violate any air quality standard or contribute substantially to an existing or project air quality violation).
- 3-3 • In an event alternative 2 is chosen for booster pump station, then please attach the preliminary and final Project design plan to the cultural resources report.
- 3-4 • Cultural Resources mitigation measure 5 (page 40) states that there will be a cultural resources sensitivity training either in person or via a training module. Please retain a log of training documentation.
- 3-5 • Under Geology, Soils, and Seismicity, part of the Project footprint falls under the liquefaction zone (figure 5). Specifically state how the CBC and Standard engineering and construction practices would protect the booster pump station and part of the pipeline from seismic ground-related failure, including liquefaction.

- 3-2 The correct box is the "Less Than Significant With Mitigation." The change requested is hereby incorporated by reference.**
- 3-3 The final project design will be incorporated into the cultural resources report when the CEQA Plus package is submitted to the State Board..**
- 3-4 Based on this request, a log of training field personnel will be maintained by IEUA or the contractor.**
- 3-5 The facilities referenced in this comment will be protected by establishing proper foundations to ensure that any liquefaction hazards will be controlled to a less than significant impact level.**

3-6 Please provide us with the following documents applicable to the proposed Project following the Agency's California Environmental Quality Act (CEQA) process: (1) one copy of the draft and final IS/MND, (2) the resolution adopting the IS/MND and making CEQA findings, (3) all comments received during the review period and the Agency's response to those comments, (4) the adopted Mitigation Monitoring and Reporting Program (MMRP), and (5) the Notice of Determination filed with the San Bernardino County Clerk and the Governor's Office of Planning and Research, State Clearinghouse. We would appreciate notices of any hearings or meetings held regarding environmental review of any projects to be funded by the State Water Board.

3-7 Thank you for the opportunity to review the Agency's draft IS/MND. If you have any questions or concerns, please feel free to contact me at (916) 319-0220, or by email at [Sahil.Pathak@waterboards.ca.gov](mailto:Sahil.Pathak@waterboards.ca.gov), or contact Ahmad Kashkoli at (916) 341-5855, or by email at [Ahmad.Kashkoli@waterboards.ca.gov](mailto:Ahmad.Kashkoli@waterboards.ca.gov).

Sincerely,



Sahil Pathak  
Environmental Scientist

Enclosures (3)

1. Clean Water State Revolving Fund Environmental Review Requirements
2. Quick Reference Guide to CEQA Requirements for State Revolving Fund Loans
3. Basic Criteria for Cultural Resources Reports

cc: State Clearinghouse  
(Re: SCH# 2016051051)  
P.O. Box 3044  
Sacramento, CA 95812-3044

- 3-6 Your comment is noted and will be retained in the project file that is made available to the Agency decision-makers prior to a decision on the proposed project. When CWSRF funding is sought in the future, IEUA will provide the information listed in this comment.**
- 3-7 Your comment is noted and will be retained in the project file that is made available to the Agency decision-makers prior to a decision on the proposed project.**

## National Historic Preservation Act (NHPA)

Section 106 of the NHPA requires an analysis of the effects on "historic properties." The Section 106 process is designed to accommodate historic preservation concerns for federal actions with the potential to affect historic properties. Early consultation with appropriate government agencies, Indian tribes, and members of the public, will ensure that their views and concerns are addressed during the planning phase.

Historic properties (i.e., buildings, structures, objects, and archaeological sites 50 years or older) are properties that are included in the National Register of Historic Places or meet the criteria for the National Register.

### Required Documents:

- ✓ A draft State Historic Preservation Officer consultation request letter; and
- ✓ A cultural resources report on historic properties conducted according to the Secretary of the Interior's Standards, including:
  - A clearly defined Area of Potential Effect (APE), specifying the length, width, and depth of excavation, with a map clearly illustrating the project APE;
  - A records search, less than one year old, extending to a half-mile beyond the project APE;
  - Written description of field methods;
  - Identification and evaluation of historic properties within the project's APE; and
  - Documentation of consultation with the Native American Heritage Commission and local Native American tribes.

## ADDITIONAL INFORMATION

If your project has the potential to affect biological resources or historic properties, the consultation process can be lengthy. Please contact the State Water Board staff early in your planning process to discuss what additional information may be needed for your specific project.

Please contact your State Water Board Project Manager or Mr. Ahmad Kashkoli at (916) 341-5855 or [Ahmad.Kashkoli@waterboards.ca.gov](mailto:Ahmad.Kashkoli@waterboards.ca.gov) for more information related to the CWSRF Program environmental review process and requirements.



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STATE WATER RESOURCES CONTROL BOARD  
REGIONAL WATER QUALITY CONTROL BOARDS  
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CLEAN WATER STATE REVOLVING FUND

# Environmental Review Requirements

State Water Resources Control Board  
Division of Financial Assistance



# ENVIRONMENTAL REVIEW REQUIREMENTS

The Clean Water State Revolving Fund (CWSRF) Program is partially funded by the United States Environmental Protection Agency (EPA), and is subject to federal environmental regulations as well as the California Environmental Quality Act (CEQA). All applicants seeking CWSRF financing must comply with both CEQA and the federal cross-cutting regulations. The "Environmental Package" provides the forms and instructions needed to complete the environmental review requirements for CWSRF financing. The forms and instructions are available at: [http://www.waterboards.ca.gov/water\\_issues/programs/grants\\_loans/srf/srf\\_forms.shtml](http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/srf_forms.shtml).

## Lead Agency/Applicant

The applicant will generally act as the "Lead Agency" for environmental review. It will prepare, circulate, and consider the environmental documents prior to approving the project. It also provides the State Water Board with copies of the CEQA documents, and a completed "Environmental Evaluation Form for Environmental Review and Federal Coordination" ([http://www.waterboards.ca.gov/water\\_issues/programs/grants\\_loans/srf/docs/forms/application\\_environmental\\_package.pdf](http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/docs/forms/application_environmental_package.pdf)) with supporting documents as part of the "Environmental Package."

## Responsible Agency/State Water Board

The State Water Board acts on behalf of EPA to review and consider the environmental documents before approving financing. The State Water Board may require additional studies or documentation to make its own CEQA findings, as well as circulate CEQA documents and other environmental reports to relevant federal agencies for consultation before making a determination about the project financing.

The Applicant must address all relevant federal agencies' comments before project financing is approved.

# FEDERAL CROSS-CUTTING REGULATIONS

The CWSRF Program requires consultation with relevant federal agencies on the following federal environmental regulations, if applicable to the project:

- Clean Air Act
- Coastal Barriers Resources Act
- Coastal Zone Management Act
- Endangered Species Act
- Environmental Justice
- Farmland Protection Policy Act
- Floodplain Management
- Magnuson-Stevens Fishery Conservation and Management Act
- Migratory Bird Treaty Act
- National Historic Preservation Act
- Protection of Wetlands
- Safe Drinking Water Act, Sole Source Aquifer Protection
- Wild and Scenic Rivers Act

The following is a brief overview of requirements for some of the key regulations.

## Clean Air Act (CAA)

The CAA general conformity analysis only applies to projects in areas not meeting the National Ambient Air Quality Standards or subject to a maintenance plan.

If project emissions are below the federal "de minimis" levels then:

- A general conformity analysis is not required.

If project emissions are above the federal "de minimis" levels then:

- A general conformity determination for the project must be made. A general conformity determination can be made if facilities are sized to meet the needs of current population projections used in an approved State Implementation Plan for air quality.

- Using population projections, applicants must explain how the proposed capacity increase was calculated

An air quality modeling analysis is necessary of all projects for the following criteria pollutants, regardless of attainment status:

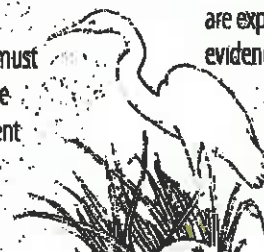
- Carbon monoxide
- Lead
- Oxides of nitrogen
- Ozone
- Particulate matter (PM2.5 and PM10)
- Sulfur dioxide

## Endangered Species Act (ESA)

The ESA requires an analysis of the effects on federally listed species. The State Water Board will determine the project's potential effects on federally listed species, and will initiate informal/formal consultation with the United States Fish and Wildlife Service (USFWS) and/or the National Marine Fisheries Service, as necessary under Section 7 of the ESA.

### Required Documents:

- ✓ A species list, less than one year old, from the USFWS and the California Department of Fish and Wildlife's Natural Diversity Database,
- ✓ A biological survey conducted during the appropriate time of year,
- ✓ Maps or documents (biological reports or biological assessments, if necessary), and
- ✓ An assessment of the direct or indirect impacts to any federally listed species and/or critical habitat. If no effects are expected, explain why and provide the supporting evidence.





# Basic Criteria for Cultural Resources Report Preparation

State Water Resources Control Board  
Division of Financial Assistance

For Section 106 Consultation with the State Historic Preservation Officer (SHPO)  
under the National Historic Preservation Act

## CULTURAL RESOURCES REPORT

The Cultural Resources Report must be prepared by a qualified researcher that meets the Secretary of the Interior's Professional Qualifications Standards. Please see the Professional Qualifications Standards at the following website at: [http://www.cr.nps.gov/local-law/arch\\_stnds\\_9.htm](http://www.cr.nps.gov/local-law/arch_stnds_9.htm)

The Cultural Resources Report should include one of the four "findings" listed in Section 106. These include:

### ***"No historic properties affected"***

(no properties are within the area of potential effect (APE; including below the ground).

### ***"No effect to historic properties"***

(properties may be near the APE, but the project will not have any adverse effects).

### ***"No adverse effect to historic properties"***

(the project may affect "historic properties", but the effects will not be adverse).

### ***"Adverse effect to historic properties"***

Note: Consultation with the SHPO will be required if a "no adverse effect to historic properties" or an "adverse effect to historic properties" determination is made, to develop and evaluate alternatives or modifications to the proposed project that could avoid, minimize or mitigate adverse effects on "historic properties."

## RECORDS SEARCH

- A records search (less than one year old) extending to a half-mile beyond the project APE from a geographically appropriate Information Center is required. The records search should include maps that show all recorded sites and surveys in relation to the APE for the proposed project, and copies of the confidential site records included as an appendix to the Cultural Resources Report.
- The APE is three-dimensional (depth, length and width) and all areas (e.g., new construction, easements, staging areas, and access roads) directly affected by the proposed project.



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## NATIVE AMERICAN and INTERESTED PARTY CONSULTATION

- Native American and interested party consultation should be initiated at the planning phase of the proposed project to gather information to assist with the preparation of an adequate Cultural Resources Report.
- The Native American Heritage Commission (NAHC) must be contacted to obtain documentation of a search of the Sacred Lands Files for or near the project APE.
- All local Native American tribal organizations or individuals identified by the NAHC must be contacted by certified mail, and the letter should include a map and a description of the proposed project.
- Follow-up contact should be made by telephone and a phone log maintained to document the contacts and responses.
- Letters of inquiry seeking historical information on the project area and local vicinity should be sent to local historical societies, preservation organizations, or individual members of the public with a demonstrated interest in the proposed project.

**Copies of all documents mentioned above (project description, map, phone log and letters sent to the NAHC and Native American tribal organizations or individuals and interested parties) must be included in the Cultural Resources Report.**

**Contact Information:** For more information related to the CWSRF Program Cultural Resources and Requirements, please contact Mr. Ahmad Kashkoli at 916-341-5855 or [Ahmad.Kashkoli@waterboards.ca.gov](mailto:Ahmad.Kashkoli@waterboards.ca.gov)

## PRECAUTIONS

A finding of ***“no known resources”*** without supporting evidence is unacceptable. The Cultural Resources Report must identify resources within the APE or demonstrate with sufficient evidence that none are present.

***“The area is sensitive for buried archaeological resources,”*** followed by a statement that ***“monitoring is recommended.”*** Monitoring is not an acceptable option without good-faith effort to demonstrate that no known resource is present.

If ***“the area is already disturbed by previous construction”*** documentation is still required to demonstrate that the proposed project will not affect ***“historic properties.”*** An existing road can be protecting a buried archaeological deposit or may itself be a ***“historic property.”*** Additionally, previous construction may have impacted an archaeological site that has not been previously documented.

## SHPO CONSULTATION LETTER

Submit a draft consultation letter prepared by the qualified researcher with the Cultural Resources Report to the State Water Resources Control Board. A draft consultation letter template is available for download on the State Water Board webpage at: [http://www.waterboards.ca.gov/water\\_issues/programs/grants\\_loans/cwsrf\\_requirements.shtml](http://www.waterboards.ca.gov/water_issues/programs/grants_loans/cwsrf_requirements.shtml)



STATE WATER RESOURCES CONTROL BOARD  
ADDRESS: 1401 STREETWAY, SACRAMENTO, CALIFORNIA 95833

[waterboards.ca.gov](http://waterboards.ca.gov)

# California Environmental Quality Act Requirements

State Water Resources Control Board  
Division of Financial Assistance

The State Water Resources Control Board (State Water Board), Division of Financial Assistance, administers the Clean Water State Revolving Fund (CWSRF) Program. The CWSRF Program is partially funded by grants from the United States Environmental Protection Agency. All applicants seeking CWSRF financing must comply with the California Environmental Quality Act (CEQA), and provide sufficient information so that the State Water Board can document compliance with federal environmental laws. The "Environmental Package" provides the forms and instructions needed to complete the environmental review requirements for CWSRF Program financing. It is available at:  
[http://www.waterboards.ca.gov/water\\_issues/programs/grants\\_loans/srf/srf\\_forms.shtml](http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/srf_forms.shtml)



We've got the green...  
to keep California's water clean  
CLEAN WATER STATE REVOLVING FUND

**Contact Information:** For more information related to the CWSRF Program environmental review process and requirements, please contact your State Water Board Project Manager or Mr. Ahmad Kashkoli at 916-341-5855 or [Ahmad.Kashkoli@waterboards.ca.gov](mailto:Ahmad.Kashkoli@waterboards.ca.gov)

## LEAD AGENCY

The applicant is usually the "Lead Agency" and must prepare and circulate an environmental document before approving a project. Only a public agency, such as a local, regional or state government, may be the "Lead Agency" under CEQA. If a project will be completed by a non-governmental organization, "Lead Agency" responsibility goes to the first public agency providing discretionary approval for the project.

## RESPONSIBLE AGENCY

The State Water Board is generally a "Responsible Agency" under CEQA. As a "Responsible Agency," the State Water Board must make findings based on information provided by the "Lead Agency" before financing a project.

## ENVIRONMENTAL REVIEW

The State Water Board's environmental review of the project's compliance with both CEQA and federal cross-cutting regulations must be completed before a project can be financed by the CWSRF Program.

## DOCUMENT REVIEW

Applicants are encouraged to consult with State Water Board staff early during preparation of CEQA document if considering CWSRF financing. Applicants shall also send their environmental documents to the State Water Board, Environmental Review Unit during the CEQA public review period. This way, any environmental concerns can be addressed early in the process.

## REQUIRED DOCUMENTS

The Environmental Review Unit requires the documents listed below to make findings and complete its environmental review. Once the State Water Board receives all the required documents and makes its own findings, the environmental review for the project will be complete.

- ✓ Draft and Final Environmental Documents: Environmental Impact Report, Negative Declaration, and Mitigated Negative Declaration as appropriate to the project
- ✓ Resolution adopting/certifying the environmental document, making CEQA findings, and approving the project
- ✓ All comments received during the public review period and the "Lead Agency's" responses to those comments
- ✓ Adopted Mitigation Monitoring and Reporting Plan, if applicable
- ✓ Date-stamped copy of the Notice of Determination or Notice of Exemption filed with the County Clerk(s) and the Governor's Office of Planning and Research
- ✓ CWSRF Evaluation Form for Environmental Review and Federal Coordination with supporting documents

Water Boards

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## ATTACHMENT 3:

# Mitigation, Monitoring, and Reporting Program



**INLAND EMPIRE UTILITIES AGENCY  
IEUA POMONA INTERTIE PROJECT  
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Implementation Schedule	Verification	
<p><b>Air Quality</b></p> <p><b>AIR-1</b> Using best available control measures during soil disturbance. The menu of enhanced dust control measures includes the following:</p> <ul style="list-style-type: none"> <li>• Limit the disturbance "footprint" to as small an area as practical.</li> <li>• Water all active construction areas at least twice daily.</li> <li>• Cover all off-site haul trucks or maintain at least 2 feet of freeboard.</li> <li>• Pave or apply water four times daily to all unpaved parking or staging areas.</li> <li>• Sweep or wash any site access points within 30 minutes of any visible dirt deposition on any public roadway.</li> <li>• Cover or water twice daily any on-site stockpiles of debris, dirt or other dusty material.</li> <li>• Suspend all operations on any unpaved surface if winds exceed 25 mph.</li> </ul>	<p>This measure shall be incorporated into the construction contract when it is prepared. This measure shall be implemented and monitored by the Contractor during construction. Field notes documenting implementation shall be maintained onsite by the Contractor.</p>	<p>A copy of the construction contract shall be retained in the project file. Verification of implementation shall be based on field inspections by Agency inspection personnel during construction, including contractor field notes documenting implementation. Field notes documenting verification shall be retained in the project file.</p>	
	<b>Source</b>	<b>Responsible Party</b>	<b>Status / Date / Initials</b>
	Initial Study	IEUA / Contractor	

Mitigation Measure	Implementation Schedule	Verification	
<p><b>Air Quality</b></p> <p><b>AIR-2</b> Limit allowable idling to 5 minutes for trucks and heavy equipment before shutting the equipment down.</p>	<p>This measure shall be incorporated into the construction contract when it is prepared. This measure shall be implemented and monitored by the Contractor during construction. Field notes documenting implementation shall be maintained onsite by the Contractor.</p>	<p>A copy of the construction contract shall be retained in the project file. Verification of implementation shall be based on field inspections by Agency inspection personnel during construction, including contractor field notes documenting implementation. Field notes documenting verification shall be retained in the project file.</p>	
	<b>Source</b>	<b>Responsible Party</b>	<b>Status / Date / Initials</b>
	Initial Study	IEUA / Contractor	

**INLAND EMPIRE UTILITIES AGENCY  
IEUA POMONA INTERTIE PROJECT  
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Implementation Schedule	Verification				
<b><i>Air Quality</i></b> <b>AIR-3</b> Utilize Tier 3 rated diesel engines for off-road construction equipment.	This measure shall be incorporated into the construction contract when it is prepared. This measure shall be implemented and monitored by the Contractor during construction. Field notes documenting implementation shall be maintained onsite by the Contractor.	A copy of the construction contract shall be retained in the project file. Verification of implementation shall be based on field inspections by Agency inspection personnel during construction, including contractor field notes documenting implementation. Field notes documenting verification shall be retained in the project file.				
				Source	Responsible Party	Status / Date / Initials
				Initial Study	IEUA / Contractor	

Mitigation Measure	Implementation Schedule	Verification				
<b><i>Biological Resources</i></b> <b>BIO-1</b> Prior to removal of the four oak trees present within the proposed AWTF, IEUA shall consult with the City of Montclair to determine the appropriate location and number of trees to be planted within the facility according to the regulations outlined in the City of Montclair Tree Policy.	The oak tree management plan shall be completed and approved prior to removal of the oak trees, and the plan shall be implemented during project construction.	A copy of the oak tree management plan shall be retained in the project file. Verification of implementation shall be based on field inspections by Agency inspection personnel during and after construction, including contractor field notes documenting implementation. Field notes documenting verification shall be retained in the project file.				
				Source	Responsible Party	Status / Date / Initials
				Initial Study	IEUA / Contractor	

**INLAND EMPIRE UTILITIES AGENCY  
IEUA POMONA INTERTIE PROJECT  
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Implementation Schedule	Verification
<p><b>Cultural Resources</b> CUL-1 In the event that booster pump station alternative 2 is selected, IEUA shall retain a qualified architectural historian meeting the Secretary of the Interior's Professional Qualification Standards for architectural history to review and approve the preliminary and final project design plans to ensure that it conforms to the Secretary of the Interior's Standards.</p>	<p>Under this measure and prior to construction a historical report on the project's final design shall be completed and concurrence in final design shall receive review and approval from the historian. The approved final design shall be implemented in accordance with the approved plans during construction.</p>	<p>A copy of the approved historical report on final design shall be retained in the project file. Verification of implementation shall be based on field inspections by Agency inspection personnel during and after construction, including contractor field notes documenting implementation. Field notes documenting verification shall be retained in the project file.</p>
	<b>Source</b>	<b>Responsible Party</b>
	Initial Study	IEUA / Contractor
		<b>Status / Date / Initials</b>

Mitigation Measure	Implementation Schedule	Verification
<p><b>Cultural Resources</b> CUL-2 A qualified archeologist, defined as an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for archaeology (36 CFR Part 61), or an archaeologist working under the direction of a qualified archaeologist, shall conduct pre-construction cultural resources sensitivity training to inform construction personnel on the types of cultural resources that may be encountered, and to bring awareness to personnel of actions to be taken in the event of a cultural resources discovery. IEUA shall complete training for all construction personnel and retain documentation showing when training of personnel was completed.</p>	<p>The pre-construction sensitivity training shall be conducted for all onsite employees prior to entering the work site(s).</p>	<p>A log of all trained employees shall be compiled and retained in the project file, including the date of training and the date that an employee reaches the work site(s).</p>
	<b>Source</b>	<b>Responsible Party</b>
	Initial Study	IEUA / Contractor
		<b>Status / Date / Initials</b>

**INLAND EMPIRE UTILITIES AGENCY  
IEUA POMONA INTERTIE PROJECT  
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Implementation Schedule	Verification	
<p><b>Cultural Resources</b></p> <p><b>CUL-3</b> Archaeological monitoring shall be conducted for all initial ground-disturbing activities at the AWTF and booster pump station alternatives. If during initial observations of a fair sampling of the area, the monitor determines the area lacks archaeological potential due to evidence of past disturbances, monitoring may be discontinued after consultation with the qualified archaeologist. If it appears that the area appears undisturbed and there is a potential for intact subsurface resources, then full-time monitoring shall be implemented to a depth of 5 feet (anticipated depth of older Quaternary deposits). Monitoring may be discounted at depths above 5 feet if older Quaternary deposits are encountered. Archaeological monitoring shall be conducted by a monitor familiar with the types of archaeological resources that could be encountered within the project area, and under the direct supervision of the qualified archaeologist. The monitor shall observe all ground-disturbing activities, including but not limited to, brush clearance, grubbing, demolition and concrete removal, and grading and excavation and shall be empowered to halt or redirect ground-disturbing activities away from the vicinity of a discovery until the qualified archaeologist has evaluated the discovery and determined appropriate treatment (as prescribed in Mitigation Measure CUL-4). The monitor shall keep daily logs detailing the types of activities and soils observed, and any discoveries. After monitoring has been completed, the qualified archaeologist shall prepare a monitoring report that details the results of monitoring. The report shall be submitted to the IEUA, SCCIC, and any Native American groups who request a copy.</p>	<p>This monitoring measure shall be implemented during initial ground disturbing activities. Monitoring logs shall be compiled daily and a final report shall be compiled and submitted at the end of the monitoring effort.</p>	<p>Monitoring logs and the final monitoring report shall be retained in the project file. Field inspectors shall verify that monitors are in the field during construction activities and provide notes to the file verifying this finding.</p>	
	<b>Source</b>	<b>Responsible Party</b>	<b>Status / Date / Initials</b>
	Initial Study	IEUA / Contractor	



**INLAND EMPIRE UTILITIES AGENCY  
IEUA POMONA INTERTIE PROJECT  
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Implementation Schedule	Verification
<p><b>Cultural Resources</b></p> <p><b>CUL-4</b> In the event of the discovery of archaeological materials, IEUA shall immediately cease all work activities in the area (within approximately 50 feet) of the discovery until it can be evaluated by the qualified archaeologist. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or tool-making debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-period materials might include stone or concrete footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. Construction shall not resume until the qualified archaeologist has conferred with the IEUA on the significance of the resource.</p> <p>If it is determined that the discovered archaeological resource constitutes a historical or unique archaeological resource under CEQA, avoidance and preservation in place is the preferred manner of mitigation. Preservation in place maintains the important relationship between artifacts and their archaeological context and also serves to avoid conflict with traditional and religious values of groups who may ascribe meaning to the resource. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, a Cultural Resources Treatment Plan shall be prepared and implemented by a qualified archaeologist in consultation with the IEUA that provides for the adequate recovery of the scientifically consequential information contained in the archaeological resource. The IEUA shall consult with appropriate Native American representatives in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond that which is scientifically important, are considered.</p>	<p>This measure shall be implemented during ground disturbing construction activities.</p>	<p>If any cultural resources or human remains are discovered, the reports compiled regarding management of any discovery shall be retained in the project file.</p>
	<b>Source</b>	<b>Responsible Party</b>
	Initial Study	IEUA / Contractor
		<b>Status / Data / Initials</b>

**INLAND EMPIRE UTILITIES AGENCY  
IEUA POMONA INTERTIE PROJECT  
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Implementation Schedule	Verification				
<p><b>Cultural Resources</b></p> <p><b>CUL-5</b> Prior to earthmoving activities, a Qualified Paleontologist (QP) meeting the Society of Vertebrate Paleontology (SVP) standards (SVP, 2010) shall be retained. The QP shall contribute to any construction worker cultural resources sensitivity training either in person or via a training module provided to the qualified archaeologist. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the project site and the procedures to be followed if they are found. The QP shall also oversee the paleontological monitoring (as prescribed in CUL-6) and shall be available to ascertain the significance of any paleontological resources recovered during project excavations (as prescribed in CUL-7). The QP shall also conduct periodic spot-checks of exposed sediments to assist the qualified paleontological monitor in determining the age/sensitivity of exposed sediments and/or paleontological resources encountered during project excavations.</p>	<p>This measure shall be implemented during ground disturbing construction activities.</p>	<p>If any paleontological resources are discovered, the reports compiled regarding management of any discovery shall be retained in the project file.</p>				
				Source	Responsible Party	Status / Date / Initials
				Initial Study	IEUA / Contractor	

Mitigation Measure	Implementation Schedule	Verification				
<p><b>Cultural Resources</b></p> <p><b>CUL-6</b> Prior to earthmoving activities, a qualified paleontological monitor meeting the Society of Vertebrate Paleontology (SVP) standards (SVP, 2010) shall be retained. The qualified paleontological monitor shall monitor all excavations into native sediments below 5 feet in depth and have the authority to temporarily halt or divert work away from exposed fossils in order to recover the fossil specimens safely and quickly. The qualified paleontological monitor shall complete daily monitoring logs outlining the day's activities. Paleontological monitoring may be increased or decreased if fossils are discovered above 5 feet or if the QP determines that based on subsurface sediments the potential for encountering significant paleontological resources is low.</p>	<p>This measure shall be implemented during ground disturbing construction activities.</p>	<p>If any paleontological resources are discovered, the reports compiled regarding management of any discovery shall be retained in the project file.</p>				
				Source	Responsible Party	Status / Date / Initials
				Initial Study	IEUA / Contractor	

**INLAND EMPIRE UTILITIES AGENCY  
IEUA POMONA INTERTIE PROJECT  
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Implementation Schedule	Verification				
<p><b>Cultural Resources</b></p> <p><b>CUL-7</b> If paleontological resources are encountered during ground-disturbing activities, all work within 100 feet of the find shall halt until the find can be evaluated by the QP and appropriate measures taken to salvage the specimens if they are determined to be potentially significant. If sediments are encountered that are deemed appropriate for the recovery of microvertebrate specimens, the QP shall direct the paleontological monitor to collect a test sample (approximately 600 pounds per SVP standards or an amount determined by the QP) to screen for microvertebrates either on or off site. The QP, based on observations of subsurface soil stratigraphy or other factors, may reduce or discontinue monitoring as warranted if he or she determines that the possibility of encountering fossiliferous deposits is low. The QP shall prepare a final monitoring report to be submitted to the IEUA and filed with the local repository along with any fossils and associated data recovered during construction.</p>	<p>This measure shall be implemented during ground disturbing construction activities.</p>	<p>If any paleontological resources are discovered, the reports compiled regarding management of any discovery shall be retained in the project file.</p>				
				Source	Responsible Party	Status / Date / Initials
				Initial Study	IEUA / Contractor	

Mitigation Measure	Implementation Schedule	Verification				
<p><b>Cultural Resources</b></p> <p><b>CUL-8</b> If human remains are encountered, the contractor shall halt work in the vicinity (within 100 feet) of the find and contact the San Bernardino County Coroner in accordance with Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5. If the County Coroner determines that the remains are Native American, the NAHC will be notified in accordance with Health and Safety Code Section 7050.5, subdivision (c), and Public Resources Code Section 5097.98 (as amended by AB 2641). The NAHC will designate a Most Likely Descendant (MLD) for the remains per Public Resources Code Section 5097.98. Until the landowner has conferred with the MLD, the IEUA shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity, is adequately protected according to generally accepted cultural or archaeological standards or practices, and that further activities take into account the possibility of multiple burials.</p>	<p>This measure shall be implemented during ground disturbing construction activities.</p>	<p>If any cultural resources or human remains are discovered, the reports compiled regarding management of any discovery shall be retained in the project file.</p>				
				Source	Responsible Party	Status / Date / Initials
				Initial Study	IEUA / Contractor	

**INLAND EMPIRE UTILITIES AGENCY  
IEUA POMONA INTERTIE PROJECT  
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Implementation Schedule	Verification				
<p><b>Cultural Resources</b></p> <p><b>CUL-9</b> During ground disturbing activities (including but not limited to pavement removal, pot-holing or auguring, boring, grading, excavation and trenching) at least one Native American Monitor will be present at the project site. The Native American Monitor will compile monitoring logs on a daily basis. The logs will provide descriptions of the daily activities, including construction activities, locations, soil characteristics and any cultural materials identified. The Monitor shall photo-document the ground disturbing activities. If any cultural materials are identified, the Monitor shall have the authority to redirect construction activities until the extent and importance of the materials are assessed. Subsequent management of any Native American cultural materials shall be determined through consultation between IEUA and the Native American Band supplying the monitor. Any human remains encountered shall be handled through the County Coroner's office and, if necessary, in conjunction with Native American Heritage Commission and Native American Band.</p>	<p>This measure shall be implemented during ground disturbing construction activities.</p>	<p>If any cultural resources or human remains are discovered, the reports compiled regarding management of any discovery shall be retained in the project file, including Native American resources.</p>				
				Source	Responsible Party	Status / Date / Initials
				Initial Study	IEUA / Contractor	

Mitigation Measure	Implementation Schedule	Verification				
<p><b>Geology, Soils and Seismicity</b></p> <p><b>GEO-1</b> In accordance with the National Pollution Discharge Elimination System (NPDES) Construction General Permit, IEUA shall prepare a project specific Stormwater Pollution Prevention Plan (SWPPP) to minimize soil erosion. The SWPPP shall prescribe temporary Best Management Practices (BMPs), such as, but not limited to, sediment barriers and traps, silt basins, and silt fences. In addition, BMPs to permanently stabilize the pipeline alignment and new structural sites shall be installed prior to completing final construction activities. This shall include onsite detention or percolation sufficient to offset a substantial increase in the downstream volume of runoff in the drainage area.</p>	<p>The SWPPP shall be completed by the Contractor prior to initiating construction and provided to the Agency. The SWPPP shall be implemented during construction.</p>	<p>A copy of the SWPPP shall be retained in the project file and at the construction job site. Field inspections shall verify that the best management practices required by a project specific SWPPP are effective in controlling erosion and water quality degradation, and a copy of inspection notes shall be retained in the project file.</p>				
				Source	Responsible Party	Status / Date / Initials
				Initial Study	IEUA / Contractor	

**INLAND EMPIRE UTILITIES AGENCY  
IEUA POMONA INTERTIE PROJECT  
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Implementation Schedule	Verification	
<p><b>Noise</b></p> <p><b>NOI-1</b> IEUA shall require its construction contractor to implement the following measures during construction, as needed:</p> <ul style="list-style-type: none"> <li>• Include design measures necessary to reduce the construction noise levels to surrounding residential properties and sensitive receptors. These measures may include noise barriers, curtains, or shields.</li> <li>• Locate stationary construction noise sources and place noise-generating construction activities (e.g. operation of compressors and generator, or general truck idling) as far from adjacent noise-sensitive receptors as possible.</li> <li>• If construction is to occur near a school, the construction contractor shall coordinate with school administration in order to limit disturbance to the campus. Efforts to limit construction activities to non-school days shall be encouraged.</li> <li>• For construction occurring adjacent to noise-sensitive land uses, identify a liaison for sensitive receptors, such as residents and property owners, to contact with concerns regarding construction noise and vibration. The liaison's telephone number(s) shall be prominently displayed at construction locations.</li> <li>• For project components located adjacent to noise-sensitive land uses, notify in writing all landowners and occupants of properties adjacent to the construction area of the anticipated construction schedule at least 2 weeks prior to groundbreaking, when feasible.</li> <li>• Restrict construction activities to between the hours of 7:00AM and 8:00PM in residentially-zoned areas within the City of Pomona.</li> </ul>	<p>This measure shall be incorporated into the construction contract. This measure shall be implemented and monitored by the Contractor during construction. Field notes documenting implementation shall be maintained onsite by the Contractor.</p>	<p>Verification of implementation shall be based on field inspections by Agency inspection personnel during construction. Field notes documenting verification shall be retained in the project file.</p>	
	<b>Source</b>	<b>Responsible Party</b>	<b>Status / Date / Initials</b>
	Initial Study	IEUA / Contractor	

**INLAND EMPIRE UTILITIES AGENCY  
IEUA POMONA INTERTIE PROJECT  
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Implementation Schedule	Verification		
<b>Noise</b> NOI-2 Haul routes shall be restricted to arterial roads and shall not be designated through residential areas or near schools, whenever feasible.	This measure shall be incorporated into the construction contract. This measure shall be implemented and monitored by the Contractor during construction. Field notes documenting implementation shall be maintained onsite by the Contractor.	Verification of implementation shall be based on field inspections by Agency inspection personnel during construction. Field notes documenting verification shall be retained in the project file.		
		<b>Source</b>	<b>Responsible Party</b>	<b>Status / Date / Initials</b>
		Initial Study	IEUA / Contractor	

Mitigation Measure	Implementation Schedule	Verification		
<b>Noise</b> NOI-3 Where permanent noise sources generate noise that exceeds 50 dBA at the nearest sensitive noise receptor, additional noise attenuation components (walls, insulation, etc.) shall be installed to ensure that noise does not exceed this 50 dBA noise threshold at the exterior wall of the receptor.	Noise attenuation measures shall be designed prior to construction and the measures shall be implemented during construction.	A copy of the noise attenuation design measures shall be retained in the project file. Verification of implementation shall be based on field inspections by IEUA/FWC inspection personnel that verify this noise measure has been implemented as required in this measure. Field notes documenting verification shall be retained in the project file.		
		<b>Source</b>	<b>Responsible Party</b>	<b>Status / Date / Initials</b>
		Initial Study	IEUA / Contractor	

**INLAND EMPIRE UTILITIES AGENCY  
IEUA POMONA INTERTIE PROJECT  
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure		Implementation Schedule	Verification
<p><b>Transportation and Traffic</b></p> <p>TR-1 IEUA shall require its construction contractor to prepare and implement a Traffic Control Plan to show specific methods for maintaining traffic flows. Examples of traffic control measures to be considered include:</p> <ol style="list-style-type: none"> <li>1) Develop circulation and detour plans to minimize impacts to local street circulation, including use of signing and flagging to guide vehicles through and/or around the construction zone.</li> <li>2) Schedule truck trips outside of peak morning (7:00 a.m. to 9:00 a.m.) and evening (4:00 p.m. to 6:00 p.m.) commute hours.</li> <li>3) Limit lane closures during peak hours to the extent possible.</li> <li>4) Use haul routes minimizing truck traffic on local roadways to the extent possible.</li> <li>5) Include accommodations for bicycles and pedestrians in all areas potentially affected by project construction, including detours and signage to maintain connectivity for bikeways and trails.</li> <li>6) Store construction materials only in designated areas.</li> <li>7) Coordinate signage for temporarily eliminated on-street parking, with instructions including timing and duration, and nearby areas where parking is currently available.</li> <li>8) Coordinate with local transit agencies for temporary relocation of routes or bus stops in works zones, as necessary.</li> <li>9) Develop comprehensive strategies for maintaining emergency flows. Strategies shall include, but are not limited to, maintaining steel trench plates at the construction sites 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.</li> </ol>		<p>This measure shall be completed prior to initiation of construction activities for the Pomona Intertie Project.</p>	<p>A copy of the approved traffic management plan shall be retained in the project file. Verification of implementation shall be based on field inspections by Agency inspection personnel during construction. Field notes documenting verification shall be retained in the project file.</p>
		<b>Source</b>	<b>Responsible Party</b>
		Initial Study	IEUA / Contractor
		<b>Status / Date / Initials</b>	

**INLAND EMPIRE UTILITIES AGENCY  
IEUA POMONA INTERTIE PROJECT  
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Implementation Schedule	Verification				
<p><b><i>Mandatory Findings of Significance</i></b>  <b>CU-1</b> The construction contractor shall consult with appropriate agencies and jurisdictions prior to initiating ground-disturbing activities, to determine if other construction projects would occur coincidentally at the same time and in the vicinity of the proposed project, depending on project schedule and pipeline segment installation. Coordination of construction activities for coincident projects shall occur to ensure impacts to traffic, circulation, access, and noise do not compound to be cumulatively significant. Adjustments to construction schedules and plans, such as traffic control plans, shall be made accordingly as necessary.</p>	<p>This measure shall be implemented prior to initiating construction.</p>	<p>Measures needed to address coincident construction activities shall be identified prior to initiating construction. IEUA staff shall verify that the measures shall be implemented in a timely manner to ensure that construction conflicts shall be minimized.</p>				
				Source	Responsible Party	Status / Date / Initials
				Initial Study	IEUA / Contractor	



**ATTACHMENT 4:**

**Notice of Determination**



**Notice of Determination**  
**Page 2 of 2**

1. The project [ will  will not] have a significant effect on the environment.
2.  An Environmental Impact Report was prepared for this project pursuant to the provisions of CEQA.  
 A Mitigated Negative Declaration was prepared for this project pursuant to the provisions of CEQA.
3. Mitigation measures [ were  were not] made a condition of the approval of the project and a Mitigation Monitoring and Reporting Plan was adopted.
4. A Statement of Overriding Considerations [ was  was not] adopted for this project.

This is to certify that the Mitigated Negative Declaration/Initial Study and record of project approval is available to the general public at:

Inland Empire Utilities Agency located at 6075 Kimball Avenue, Chino, CA 91708

*Signature*

*Title*

*Date*

# ATTACHMENT 5:

## Mitigated Negative Declaration

## MITIGATED NEGATIVE DECLARATION

**Lead Agency:** Inland Empire Utilities Agency  
6075 Kimball Avenue  
Chino, CA 91708

**Contact:** Sylvie Lee, P.E.  
**Phone:** (909) 993-1600  
**Email:** slee@ieua.org

**Project Title:** IEUA POMONA INTERTIE PROJECT

**State Clearinghouse Number:** SCH#2016051051

**Project Location:** The project regional pipeline would begin in the City of Pomona, traverse east to the City of Montclair, and would discharge into the Montclair Basin. The proposed regional pipeline will be located along the following street segments: Erie Street between Mt Vernon Ave and Orange Grove Ave in Pomona where the proposed pipeline meets the proposed booster pump station and continues on Orange Grove Ave between Erie Street and Garey Avenue in Pomona; McKinley Avenue between Garey Avenue and Towne Avenue in Pomona, Towne Avenue between McKinley Avenue and Lincoln Avenue in Pomona; Lincoln Avenue which becomes Orchard Street between Towne Avenue and Ramona Avenue in both Montclair and Pomona; and Ramona Avenue between Orchard Street and Palo Verde Street in Montclair where it meets the proposed advanced water treatment site at the corner of Palo Verde Street and Ramona Avenue. From the proposed advanced water treatment site the proposed regional pipeline travels to the Montclair Groundwater Recharge Basin from Palo Verde Street at Ramona Avenue in Montclair to Helena Avenue where the proposed regional pipeline travels under the I-10 freeway to end at the Montclair Groundwater Recharge Basin. There are two proposed locations for the pump station, Alternative 1 would be located within an empty, disturbed lot on the westside of Eerie Street between West Holt Avenue and West Orange Grove Avenue (APN 8355017006) and Alternative 2 would be located within an empty, disturbed lot on the southwest corner of North Orange Grove Avenue and East McKinley Avenue (APN 8339020028).

**Project Description:** The proposed project includes the construction of a recycled water pipeline, booster pump station, and advanced water treatment facility. The purpose of the project is to improve the groundwater replenishment system within IEUA's service area. The project would serve to consolidate wastewater treatment service in the area by maximizing the recovery of water supply from brine sources within the City of Pomona, IEUA, and Monte Vista Water District service areas.

**Finding:** Inland Empire Utilities Agency's (IEUA) decision to facilitate implementation of this proposed project is a discretionary decision or "project" that requires evaluation under the California Environmental Quality Act (CEQA). Based on the information in the project Initial Study, IEUA has made a *preliminary* determination that a Mitigated Negative Declaration will be the appropriate environmental determination for this project to comply with CEQA.

**Initial Study:** Copies of the Mitigated Negative Declaration/Initial Study are available for public review at the IEUA's office located at 6075 Kimball Avenue, Chino, CA 91708. The proposed Mitigated Negative Declaration was available for public review and comment from May 16, 2016 through June 14, 2016. Any comments were to be submitted in writing no later than June 14, 2016.

**Mitigated Negative Declaration**  
**Page 2 of 2**

**Mitigation Measures:** All mitigation measures identified in the Initial Study are summarized on pages 95-99 and are proposed for adoption as conditions of the project. These measures will be implemented through a mitigation monitoring and reporting program if the Mitigated Negative Declaration is adopted.

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*Signature*

*Title*

*Date*

# CEQA Adoption for IEUA-Pomona-MVWD Intertie



*Inland Empire Utilities Agency*  
A MUNICIPAL WATER DISTRICT

Joshua Aguilar

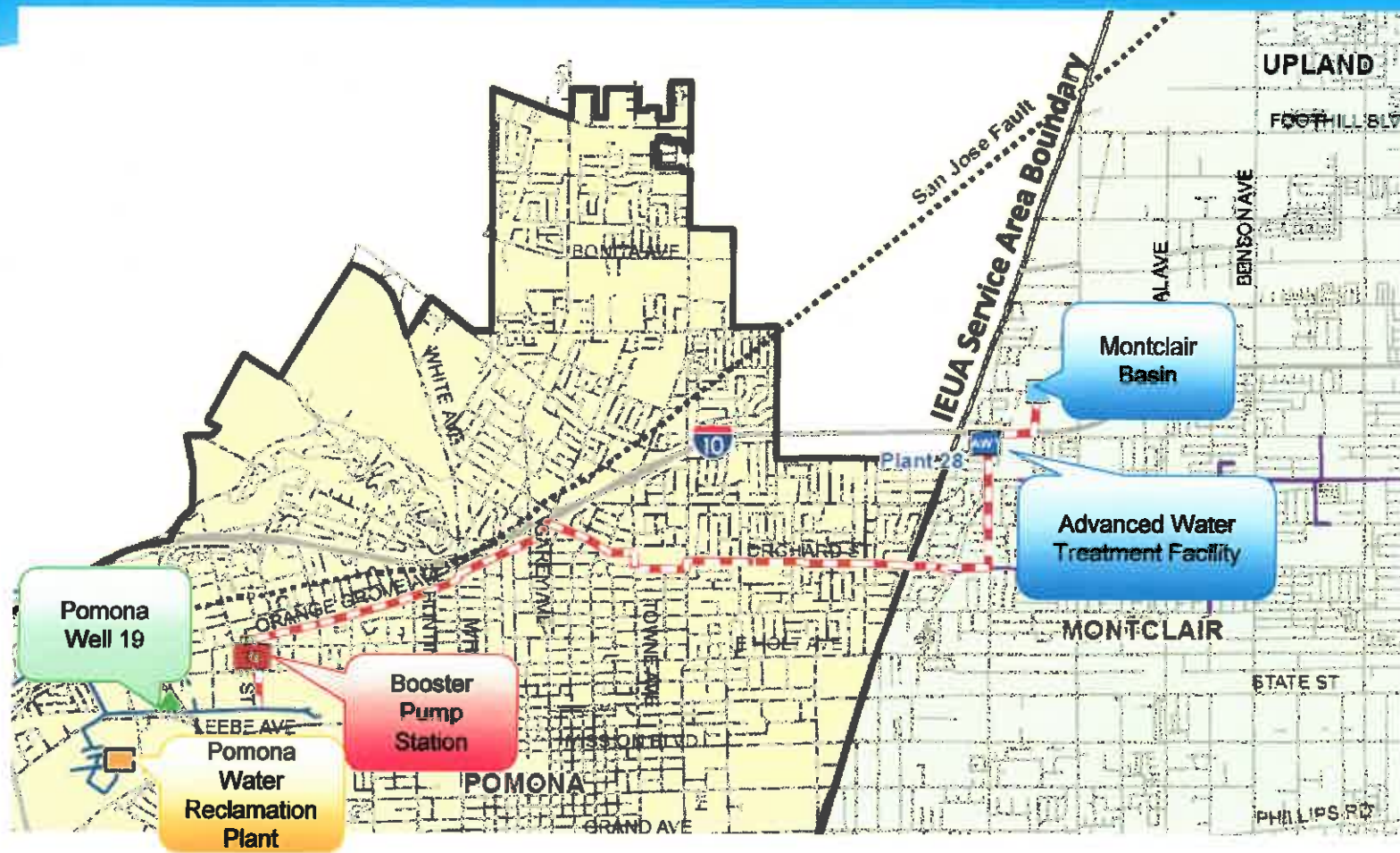
IEUA Board of Directors Meeting  
July 2016

# Project Background

- IRP identified recycled water intertie as a potential water supply
- Collaboration between Pomona, MVWD and IEUA
- Preparing Feasibility Study for a potential recycled water intertie
- Utilize excess recycled water from the City of Pomona
- Utilize groundwater from Spadra Basin of City of Pomona
- Mitigate potential land subsidence in Pomona and Montclair
- CEQA prepared for the Proposition 1 Grant and SRF loan



# Project Scope



# CEQA Findings

- Mitigated Negative Declaration (MND) to comply with CEQA
- Initial Study (IS) states findings and supports MND determination
- Mitigation, Monitoring, and Reporting Program mitigates significant impact for the following:

Air Quality	Hazards and Hazardous Materials	Transportation and Traffic
Biological Resources	Hydrology and Water Quality	Utilities, Service Systems and Energy
Cultural Resources	Land Use and Land Use Planning	Mandatory Findings of Significance
Geology, Soils, and Seismicity		Noise

- IS/MND public review completed on June 14, 2016
- Received/responded to three comments in the final IS/MND

# Recommendation

Staff recommends that the Board of Directors approve the adoption of CEQA Initial Study/Mitigated Negative Declaration for the IEUA-Pomona-MVWD Intertie, and Authorize the General Manager to file the Notice of Determination (NOD) with the San Bernardino County and Los Angeles County Clerk of the Board.


Project is consistent with the IEUA business goal of **Water Reliability** by providing new water supplies and maximizing the beneficial reuse of recycled water through the enhancement of groundwater recharge.


**INFORMATION  
ITEM  
2A**

Date: July 20, 2016

To: The Honorable Board of Directors

Through: Public, Legislative Affairs and Water Resources Committee (7/13/16)

From: P. Joseph Grindstaff  
General Manager 

Submitted by: Kathy Besser   
Manager of External Affairs

Subject: Public Outreach and Communication

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### **RECOMMENDATION**

This is an informational item for the Board of Directors to receive and file.

### **BACKGROUND**

#### July

- July is Smart Irrigation Month
- July 16, Chino Community Garden Grand Opening, 9:00 am – 12:00 pm, 5976 Riverside Drive, Chino
- July 20, Employee Appreciation Picnic, 11:30 am, Butterfield Park-17671 Mystic Canyon Drive, Chino Hills

#### August

- August 12, San Bernardino County Water Conference, Ontario Convention Center-3400 Shelby Street, Ontario

#### Outreach/Education - Civic Publications Newspaper Campaign

- IEUA sent an email blast on June 15 with the subject line reading *This summer---Are you AWARE of your water use?* The email blast led viewers to the KickWaterWaste.com website. The email generated an open rate of 26.8% with the English speaking households and 28.3% with the Spanish speaking households. A total of 23,230 total new visitors went to the *Kick The Habit* landing page on KickWaterWaste.com.
- IEUA ran a spadea in the Daily Bulletin on June 12 highlighting *Kick the Habit This Summer...* messaging and tips.



### Media and Outreach

- Staff has developed summer messaging tips and re-vamped the *Kick the Habit* logo to include a summer brand for messaging during the summer months. The tips focus on the State Water Resources Control Board's permanent restrictions following the Governor's Executive Order.
- Staff is working with Civic Publications to update and re-design the KickWaterWaste.com micro-site.
- Staff has updated the *Kick the Habit* movie trailer and began outreach through local theaters (Ontario Palace, Ontario Mills, Victoria Gardens). The campaign began on June 17 and will run for 14 weeks beginning June 17.
- Staff developed ads to promote "No Drugs Down the Drain" and IEUA's Automatic Water Softener Rebate program. These ads ran in June in the *Daily Bulletin*, *Fontana Herald News* and *La Opinion* newspapers.
- A *Kick the Habit* ad ran in the *Champion Newspaper's* Healthy Living section on June 18.
- IEUA staff placed a ¼ page *Kick the Habit* ad in the *Fontana Herald News* for the month of June.
- *Kick the Habit* bus advertisements in English and Spanish began on October 5, 2015 for an initial six month run and will continue to run for another six months. The ads are updated to include the summer messaging tips.
- In June, 22 items were posted to Facebook and 21 tweets were sent under the @IEUAWater Twitter handle.

### Education and Outreach Updates

- The Water Discovery Program for school year 2015/2016 hosted 1,597 Girl Scout troop members, elementary, middle and high school students from July 1, 2015 through June 30, 2016. Staff has begun working on scheduling field trips for program year 2016/17. To date, staff has received four inquiries on scheduling field trips for the fall.
- Staff has begun scheduling outreach/program meetings with principals within the service area for school year 16/17.
- Staff has submitted to MWD the 2017 Solar Cup Interest to Participate form to sponsor three teams. Teams will need to be identified by Thursday, September 7, 2016.
- Staff is working in cooperation with Chino Basin Water Conservation District and member agency representatives to plan the Landscape Water Conservation Fair held annually in October. The Water Conservation Fair will be held Saturday, October 29, 2016.

### PRIOR BOARD ACTION

None.

### IMPACT ON BUDGET

The above-mentioned activities are budgeted in the FY 2016/17 Administrative Service Fund, External Affairs Services budget.

**INFORMATION**

**ITEM**

**2B**

# *Innovative Federal Strategies* LLC

Comprehensive Government Relations

## MEMORANDUM

**To: Joe Grindstaff and Kathy Besser, IEUA**

**From: Letitia White, Jean Denton, and Drew Tatum**

**Date: June 30, 2016**

**Re: June Monthly Legislative Update**

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### ***Appropriations Bills Continue to Hit Speed Bumps in the House and Senate***

With the passage of the Bipartisan Budget Act of 2015, lawmakers were confident they would be able to pass all twelve appropriations bills through regular order before the beginning of the fiscal year on October 1, 2017. The Bipartisan Budget Act set the topline numbers for defense and domestic spending for FY16 and FY17, which before enactment of the agreement were subject to sequestration. The legislation, a parting gift from former Speaker John Boehner (R-OH), relied heavily on support from Democrats making it a target of the conservative wing of the Republican Party.

An obscure provision included in the agreement allowed the Senate to move forward earlier this year on FY17 spending bills without passing a budget resolution. Due to the requirement that appropriations bills must originate in the House, the Senate was able to use the leftover FY16 spending bills to begin their work on the FY17 process. In the House, what was supposed to be an easy process was halted due to infighting over a budget resolution. Conservatives objected to the budget resolution that included the new topline numbers, instead hoping for \$30 billion in cuts to offset new spending. While House leaders worked throughout the spring to bring conservative Republicans on board, a budget resolution was ultimately scrapped when no agreement could be reached.

The lack of an agreement on a budget resolution did not stop either the House or Senate Appropriations Committees from beginning their work. Both Committees have steadily advanced the annual appropriations bills, with the Senate Appropriations Committee approving all twelve to date and the House approving all but two.

Under the 1974 Congressional Budget and Impoundment Control Act, appropriations bills cannot be brought to the floor until a budget resolution is in place or May 15—whichever is earlier—without procedural maneuvering. The Senate was able to bypass that provision due to the language included in the 2015 law, but the House had to wait until May 15 before proceeding.

Though the Appropriations Committees have remained committed to completing the appropriations bills, floor action has not come as easy. While the Senate's rules allow the



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leadership to block more controversial amendments from receiving a floor vote, the House had opted to use an open rule for consideration of its legislation since 2010. As in years past, appropriations legislation has been a target for controversial policy riders. This year, controversial amendments led to the defeat of the Energy and Water Appropriations Bill on the floor of the House and caused Republican leaders to rethink the process, leading to structured rules on appropriations bills. Thus far, using a structured rule in the House has shepherded the passage of the last two appropriations bills considered—including Legislative Branch and Defense. While lawmakers are continuing to chart a path forward on the Energy and Water legislation, they are moving forward with the passage of other appropriations measures.

Although the Senate has largely avoided controversy, it has not been immune. Earlier this month, Democrats staged a talking filibuster on the Commerce, Justice, Science Appropriations bill over the desire to add restrictive gun control amendments to the legislation. While Democrats and Republicans look to find a suitable compromise, the legislation has been pulled from the floor. Additionally, the MilCon-VA/Zika Appropriations conference report was also blocked in late June.

While House and Senate leaders have committed to devoting floor time to consideration of appropriations bills, they have already admitted that consideration of individual bills will spill into September. Since it takes time to resolve differences between the House and Senate passed bills, some form of a continuing resolution will likely be necessary to keep the government funded after September 30 through the November elections. With the Republican and Democratic Political Party Conventions, the traditional summer break, and another recess in October ahead of the elections, the legislative calendar for the remainder of the year is shrinking.

### ***SCOTUS Issues Unanimous Procedural Ruling on “Waters” Regulation***

The Supreme Court issues a unanimous ruling in *Hawkes Co. v. U.S. Army Corps of Engineers* on May 31, constraining the ability of the EPA and Army Corps to invoke the Clean Water Act and designate bodies of water on private and public lands as “waters of the United States.” The eight Supreme Court justices voted unanimously in favor of the plaintiffs, ruling that Hawkes, a company that harvests peat on land it owns in Minnesota, has the right to challenge the EPA and Army Corps' WOTUS designation in federal courts under the Administrative Procedure Act.

The case was centered on the question of whether a non-binding jurisdictional determination – the EPA and/or Army Corps designating a body of water as WOTUS – was a “final agency action” that could be challenged in federal courts. While this decision does not affect the Clean Water Rule or scope of the Clean Water Act jurisdiction, it does check the EPA’s and Army Corps’ ability to invoke the CWA and designate water bodies as WOTUS, which strictly limits and exerts agency jurisdiction regarding landowners’ land and water use.

### ***Senate Energy Committee Punts Drought Legislation***

After a May 17 hearing in the Water Subcommittee of the Senate Energy and Natural Resources Committee, action on drought legislation has been light. While the Senate Energy and Natural Resources Committee was originally scheduled to hold a business meeting to markup legislation ahead of the July 4<sup>th</sup> recess, that meeting was cancelled when the Senate finished its work on the floor a day earlier than originally anticipated. While other committees kept their previously

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scheduled meetings, the Energy and Natural Resources Committee opted to postpone their meeting until after the holiday. We have been told that there are disagreements on what legislation the committee may choose to advance at the markup, which may be why consideration was delayed.

As you may recall, House Republicans have been adding their own drought provisions from the Valadao bill to legislation they believe will be conferenced with the Senate. One of the most recent cases includes the Senate's Energy Policy Modernization Act. When the House took up the legislation, it stripped the Senate language and copied in around three dozen of its own bills including drought legislation that have not been considered in the Senate. Once the legislation passed the House, Members voted to conference with the Senate. To date, the Senate has not agreed to go to conference on the legislation. Senators are worried about the final product that could emerge from a Conference Committee between the two chambers since the bills are completely different. In an effort to assuage concerns in the Senate, House Natural Resources Committee Chairman Rob Bishop (R-UT) has expressed a desire to conference a bipartisan package that can pass both the House and Senate.

### ***Chaos Over Gun Amendments Derail Plans in the House and Senate***

After a filibuster led by Senator Christopher Murphy (D-CT) and Senate Democrats, the Senate agreed to take four procedural votes on gun related amendments to the Commerce, Justice, Science Appropriations Bill. Amendments that received a vote early in the week included expanding background checks to online and gun show purchases, prohibiting gun purchased by those on government watch lists, and Republican alternatives that would have required the government to take action before denying the purchase of guns to those on watch lists. In each instance, there was a 60-vote threshold for the amendment to advance, but each fell short on a procedural vote.

Senators have been debating the best way to respond to recent shootings in Orlando and San Bernardino by strengthening background checks and preventing individuals on select government watch lists from purchasing weapons. However, major disagreements remain on how to balance the need for additional scrutiny on gun purchases with Constitutional rights. The Senate may have found a compromise in the form of an amendment offered by Senator Susan Collins (R-ME), but consideration of the FY17 CJS Appropriations Bill has been temporarily shelved while lawmakers look for a path forward.

After the Senate took votes on gun amendments, House Democrats demanded that the House also take votes prior to the July 4<sup>th</sup> recess. Since there is no mechanism for House Members to filibuster, Democrats took to the floor to stage a "sit in" on the House floor in an effort to disrupt floor action until they received a vote on gun legislation. On Wednesday June 22 after the morning prayer, the House recessed subject to the call of the Chair because order could not be established. Due to House Rules, the cameras in the chamber were cut off so Democrats took to social media to live stream their floor protest—an unprecedented action, as no recording devices are to be used on the House floor.

Due to the ability of the presiding officer to recess the House subject to the call of the chair, Republicans only brought the House into session for votes. After voting to pass a MilCon-

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VA/Zika funding conference report, the House left early for its July 4th recess. The House was originally scheduled to meet through the end of the week before leaving town, but they are now expected to return on July 5. It is unclear how or if the disagreements on addressing gun control legislation will impact the schedule in the weeks leading up to the party conventions and traditional summer break.

### ***Zika Supplemental Passes House, Blocked in the Senate***

A Conference Committee formed between the House and Senate to iron out differences in the funding bill for Military Construction and Veterans Affairs along with a supplemental appropriations package regarding the Zika issued a conference report on Wednesday, June 22 ahead of the House's scheduled recess. The Conference Committee was formed after the House and Senate advanced their own vastly different Zika proposals. Ultimately, the legislation was attached to the MilCon-VA Appropriations Bill.

The final legislation would provide \$1.1 billion in funding to fight the Zika virus and prevent it from spreading in the United States and around the world. The measure includes \$230 million for NIH, \$476 million for the CDC (including funding for response in individual states), \$85 million for BARDA R&D testing, and \$165 million for USAID Global Health Operations. The Conference Report contains \$750 million in offsets, including reprogramming unused funding from the Ebola crisis and the Affordable Care Act.

Objections from Democrats in the Senate have at least temporarily stalled progress on the legislation, which has already passed the House. In a procedural vote that required 60 votes, Senators did not vote to cut off debate on the legislation effectively filibustering the agreement. In addition to objections over raiding Affordable Care Act, Ebola, and HHS funding, Democrats objected to abortion and Clean Water Act provisions included in the legislation. In addition, President Obama has said he would veto the legislation if it came to his desk in its current form.

Lawmakers were attempting to meet a self-imposed July 4<sup>th</sup> deadline—a critical date in the eyes of the Centers for Disease Control. The CDC said that funding is necessary by that date in order to stop the spread of mosquitos that carry the virus and to continue the development of a vaccine. With no official negotiations ongoing, it is unclear if the House and Senate will be able to pass legislation ahead of their scheduled summer breaks.

### ***With Upcoming Deadline, FAA Extension Likely***

House Transportation and Infrastructure Committee Chairman Bill Shuster (R-PA) hoped to pass bold reforms to air traffic control operations as part of a reauthorization package for the Federal Aviation Administration. While Shuster was able to convince his Republican committee colleagues to report the legislation to the floor, it has not moved since February 11. Chairman Shuster's legislation would reauthorize the FAA through FY19, with some programs authorized through FY22.

In the intervening months, the Senate passed its own FAA reauthorization that would provide authorization through the end of FY17, which ends on September 30, 2017. The Senate bill does not include the controversial privatization of air traffic control operations. After passing through

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the Senate Commerce Committee, the Senate spent nearly a week considering amendments to the legislation before passing it with a bipartisan vote.

Recently, Senate Commerce Committee Chairman John Thune (R-SD) and Ranking Member Bill Nelson (D-FL) have urged the House to take up the bipartisan Senate legislation in order to avoid a last minute extension. Since the current short-term authorization expires on July 15, negotiations are under way for at least a year long extension of the current authorization with policy provisions impacting security at airports. Additionally, there is hope that the legislation can be used as a vehicle for other non-controversial policy riders that have been floated by House members and that were included in the original Senate authorization legislation.

The House was originally scheduled to release the new legislation on Friday, June 24 with the intention of bringing it to the floor in early July under a suspension of the rules. However, the release was delayed due to an early adjournment for the July 4<sup>th</sup> recess. With no legislative text in hand, it is unclear if the House would have the 2/3 majority needed to bring the bill up on a suspension vote. House Transportation and Infrastructure Committee Ranking Member Peter DeFazio has threatened to withhold support for the legislation because he said it will fail to tackle all but a few of the policy issues facing aviation. "We were negotiating over some minor but important policy changes that might get done, and not hang out there for the term of an extension," DeFazio said. Lawmakers in both the House and Senate are expected to continue negotiating during the recess with the hope of reintroducing legislation in early July that will be able to pass both chambers. The current short term extension expires on July 15.

### ***Outlook for July***

The House and Senate are both scheduled to return from a short July 4<sup>th</sup> recess during the first week of the month. Both the House and Senate are scheduled to recess for the Democratic and Republican Party Conventions by July 15. The RNC will meet in Cleveland, Ohio the week of the 18<sup>th</sup>, while the Democrats will meet in Philadelphia, Pennsylvania the week of the 25<sup>th</sup>. After the conventions, lawmakers will take their traditional summer break through Labor Day.

Possible items up for consideration during the month of July include a reauthorization of the Federal Aviation Administration (or a short term extension/must pass by 7/15), possible reconsideration of a supplemental Zika appropriations bill, and the continued consideration of the 12 annual appropriations bills.



**June 29, 2016**

**To:** Inland Empire Utilities Agency  
**From:** Michael Boccadoro  
President  
**RE:** June Legislative Report

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**Overview:**

June was a busy month for the Legislature. They adopted the Fiscal Year 2016-2017 state budget on June 15 and worked to move bills through their second-house policy committees ahead of the July 1 deadline. The state \$167 Billion budget passed, as expected, by a simple majority and did not include any expenditure of Greenhouse Gas Reduction Funds. There is speculation that the Governor is holding the expenditures until a vote is taken on Senator Fran Pavley's (D-Agoura Hills) SB 32, which would extend the Cap and Trade program and authorize 2030 and 2050 targets for greenhouse gas reductions.

A strong start to the water year has taken a turn for the worse. A dry April has left the Sierra Snowpack well below average for this time of year leading to concerns. Northern California reservoirs are sitting a close to or above 100 percent of the historical average for this time of year, while Central and Southern California reservoirs remain well below average, in most cases.

The California Public Utilities Commission has approved several pilot projects for Southern California Edison, Pacific Gas & Electric, and San Diego Gas & Electric to test whether the joint delivery of energy and water data can influence customers to turn off their tap and reduce their energy use. They will use existing SmartMeter technology to perform their tests and bring the results back to the CPUC.

The results of the most recent Cap and Trade allowance auction generated just \$10 million, \$490 million short of expected revenues. The pending legal challenge, lack of legislative authorization for targets past 2020, and a robust secondary trading market are all likely culprits for the dismal auction results. Some speculate that it might be a one-time dip in the market, others suggest auctions results will remain low until there is further certainty about the program.

SB 970 (Leyva), IEUA's sponsored bill to promote the use of existing digester capacity at wastewater treatment plants for food waste diversion, successfully passed off of the Senate floor in the beginning of June as well as the Assembly Natural Resources Committee on June 27. IEUA and WCA have been working with the author, stakeholders, the Senate Environmental Quality Committee and the Assembly Natural Resources Committee on amendments to the bill that add in some more specific considerations for CalRecycle to take regarding food waste diversion at wastewater treatment agencies when awarding grants from their Organics Grant Program.

As the end of the legislative session draws near (August 31), legislators are resorting to the “gut and amend” procedural tactic to move issues that either died in the first house, or are brand new. Senator Bob Hertzberg (D-Los Angeles) recently amended a bill to add language that attempts a Proposition 218 fix without a constitutional amendment. His bill would authorize lifeline and conservation rates. Stakeholders are questioning the measure’s constitutionality and are also concerned with the measure’s definition of “indispensable use of water.”

Additionally, Assemblymember Marc Levine (D-Marin) is attempting to revive his water transfer legislation that failed to make it out of the Assembly. His new bill only addresses reoccurring transfers, transfers for environmental benefits or reoccurring transfers that utilize State Water Project facilities.

The Legislature will go into summer recess for the month of July, and will come back in August for the final four weeks of the legislative session.

## **Inland Empire Utilities Agency Status Report – June 2016**

### ***Drought and Water Supply***

An early wet winter was a welcome change for Northern California. But the hopes of a prolonged wet season has all but evaporated, along with the Sierra snowpack. Unfortunately, the mountains did not get much snow after the start of April, state data shows. The Central Sierra received the equivalent of about 5 inches of precipitation between April 1 and June 19, a couple of inches below average.

Normally, the Sierra has an average of about 3.3 inches of snow-water remaining at this point in the year. As of June 19, it averaged just 0.1 inches. The snowline in Yosemite National Park sits at roughly 10,000 feet, covering a very small portion of the eastern side of the park.

Other signs don’t bode well for the state’s drought situation. Forecasters announced earlier this month that California faces a 75 percent chance of a potentially dry La Niña weather pattern during the fall and winter.

California continues to be abnormally dry, according to the National Drought Mitigation Center. Almost 43 percent of the state is either in extreme or exceptional drought. One year ago, about 71 percent of the state was in extreme or exceptional drought.

### *Reservoir Levels*

Reservoir	Percent of Capacity		Percent of Historical Average	
	Feb. 25	Jun. 30	Feb. 25	Jun. 30
Lake Shasta	59%	86%	82%	107%
Lake Oroville	51%	84%	74%	103%
Folsom Lake	64%	74%	116%	89%
San Luis Reservoir	47%	18%	50%	29%
Lake Perris	35%	37%	42%	46%
Castaic Lake	32%	75%	32%	86%

### *SmartMeters for Water?*

In early June, the California Public Utilities Commission (CPUC) approved a pilot program to test whether the joint delivery of energy and water data can influence customers to turn off their tap and reduce their energy use. The pilots would look at technical and other issues related to using utility smart-meter networks to get water data.

Southern California Gas Company plans to partner with the San Gabriel Water Company and Valor Water Analytics to gather data from about 1,000 meters that are joint customers of the gas company and the water agency. The data will be analyzed to assess how integrating the information can help enhance conservation efforts, and reduce greenhouse gasses.

### *State Budget*

Both houses met their Constitutional obligation to pass the FY 2016-2017 state budget by the June 15 deadline. As discussed as a possibility in the May report, the final budget package did not include any Greenhouse Gas Reduction Fund (GGRF) appropriations. Many believe that the administration and legislative leadership will hold the funding back with the hope to encourage a two-thirds vote on Senator Pavley's (D-Agoura Hills) SB 32, which would specifically authorize and extend the cap and trade program beyond 2020. Concern about having GGRF funding available after the lackluster auction has also contributed to the inaction on GGRF appropriations.

The GGRF plan can be passed by Budget Trailer Bill any time before the end of session on August 31.

### *Cap and Trade Uncertainty*

Further complicating the GGRF appropriation issue, the results from the most recent Cap and Trade Allowance Auction were released in early June. The state expected more than \$500 million to be generated in the auction of GHG allowances. However, only \$10 million was actually generated. There is significant speculation and growing concern about the poor results of the most recent auction. Ongoing concerns about the legal challenge to the Cap and Trade Program and uncertainty about CARB's legal authority post 2020 are also exacerbating the problem.

The poor auction results and legal troubles are additional reasons that the Brown Administration is likely be pushing hard to get future legislative authorization for the program and post 2020 goals in SB 32 (Pavley). A two-thirds vote of the legislature would avoid any future challenges to the validity of the program because with a super-majority vote, there would be no legal challenge regarding authorization of a tax of fee. However, it seems like an uphill battle to achieve enough votes in the legislature, especially when not all of the Democrat members can be counted on to vote for an extension and expansion of the program, let alone the handful of Republicans that would be needed to reach the two-thirds threshold.

### ***SB 970 (Leyva) Update***

IEUA's sponsored legislation, SB 970 (Leyva) was heard in the Assembly Natural Resources Committee on June 27. IEUA and WCA have been working with the consultants of the Natural Resources Committee and the Senate Environmental Quality Committee and recently amended the bill to add in some more language that allows CalRecycle to consider regional projects that leverage existing infrastructure when they consider applications in their Organics Grant Program.

The bill received some late opposition from a group of composters and some of the recent amendments were removed from the bill. However, the bill still allows CalRecycle to raise the per-project cap.

### ***Legislative Update***

With all bills now out of their house of origin, policy committees are once again back at work hearing and voting on bills from their opposite house ahead of the July 1 policy committee deadline.

There has been significant activity in the month of June on a wide range of issues including:

**SB 163 (Hertzberg):** SB 163 was a "gut and amend" in August of 2015. The bill seeks to address the issue of ocean discharge of treated wastewater. The bill, as recently amended, would require 50 percent of all ocean outfall to be recycled and also declare "waste and unreasonable use" if recycled water is made available and not taken.

A broad coalition was formed to work on the legislation including the California Chamber of Commerce, WaterReuse, California Association of Sanitation Agencies, Metropolitan Water District of Southern California and many others. As the bill neared its first policy committee hearing, it became clear to Senator Hertzberg that there was significant concern among the committee members. During his first hearing, he offered up some amendments he thought would appease members of the committee. The committee ultimately agreed to let the Senator work on the amendments with the opponents and return for another hearing the following week. Parties were unable to come to an agreement and the Senator decided to drop the bill for the current session. However, he stated that this bill is one of his top priorities and he intends to re-introduce it in January.



**SB 1298 (Hertzberg):** The California Water Foundation has been working with Senator Hertzberg on a Proposition 218 fix to allow water agencies to adopt lifeline rates and adopt conservation-based rates without amending the California Constitution.

The bill has some significant opposition from California water agencies, including ACWA, who are concerned that the bill is unconstitutional. Concern also is aimed at the term “indispensable” water use, which the measure utilizes to try to work around the Constitutional issues.

The bill was heard on June 29 in the Assembly Local Government committee. The author took amendments that are not in print yet, but it is believed that he removed all the lifeline and conservation based rates provisions from the bill.

**AB 2909 (Levine):** Assemblyman Marc Levine recently gutted a bill that is already over in the Senate and inserted language similar to his AB 2304, which did not make it out of Assembly appropriations committee earlier this year. His new bill is a paired back version of AB 2304 and only addresses reoccurring transfers and transfers that are environmentally beneficial. The bill requires the Department of Water Resources to develop a 30-day review process for reoccurring transfers, exchange of water rights, point of diversion changes, and place of use changes if the transfer is reoccurring or for an environmentally beneficially use. Additionally, the bill requires DWR to set up a 30-day review process for reoccurring water transfers between contractors for State Water Project water and for reoccurring transfers that utilize the facilities of the State Water Project.

ACWA has communicated with the author that they are in the midst of a process to develop their own language on water transfers and would like the Assemblyman to hold the bill and work with them on a bill next year. Deven Upadhyay from MWD is one of the co-chairs of the ACWA committee, ensuring strong for Southern California and contractor interests.

The bill was heard on June 28 in the Senate Natural Resources Committee where the bill passed.

Below are bills IEUA is tracking.

# *Agricultural Resources*

635 Maryland Avenue, N.E.  
Washington, D.C. 20002-5811  
(202) 546-5115  
[dweiman@agriculturalresources.org](mailto:dweiman@agriculturalresources.org)

June 30, 2016

## Legislative Report

**TO: Joe Grindstaff**  
**General Manager, Inland Empire Utility Agency**

**FR: David M. Weiman**  
**Agricultural Resources**  
**LEGISLATIVE REPRESENTATIVE, IEUA**

**SU: Legislative Report, June 2016**

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As June came to a close, Congress broke for the July 4 recess. Three major events dominated the news – the national election, the international terror attack in Istanbul (less than a year ago, my wife went through that terminal), and the domestic terror attack in Orlando.

Congress attempted to legislatively move forward – and in some cases did. In others, Congress became embroiled in gridlock. As a result of Orlando, some members are demanding votes on highly controversial gun control legislation and the Speaker has now announced that some form of legislation will be considered in early July.

All of these developments have the potential to impact pending consideration of all annual funding bills.

Congress returns from the holiday break on July 5 for ten days. The House and Senate will adjourn for the conventions and the August break no later than July 15.

### Snapshots

#### IEUA \$7 Million BuRec Grant Award

- Last year, with the leadership of Senator Feinstein, \$100 million was added to the Energy and Water Funding bill.
- BuRec then issued a RFP (Request for Proposal) and IEUA submitted a proposal.

- This past month, BuRec finally announced award grantees – seven of them.
- IEUA received a \$7 Million grant.
- IEUA received the largest of the single grants issued.
- IEUA, with these grant funds, will continue to expand its water recycling program.

**Drought Bills/Language/Status**

- Multiple bills – different approaches (exclusive of Feinstein-led efforts to provide special drought-funding).

Bill	House Action	Senate Action
H.R. 2889 (Valadao)	Passed Full House, July 16, 2015	Senate Energy and Natural Resources Committee held hearing on 10/8/2015
S. 2533 (Feinstein)	No action.	Subcommittee Hearing held June 17, 2016
S. 2902 (Flake, AZ)	No action.	Subcommittee Hearing held June 17, 2016, Bill incorporates sections from H.R. 2889
FY 2017 Energy and Water Development Appropriations	Incorporates H.R. 2889	Contains funding for western drought and Report Language on real-time Delta Smelt monitoring
FY 2017 Interior and Environment Appropriations	Incorporates H.R. 2889	Not Included.
Energy Bill (Pending Conference)	Incorporate H.R. 2889	Not Included.

Note: Chart adapted from ACWA.

Whether or not Appropriations bills will be finalized is unclear. As an amendment, the House added 200 bills to their House-passed Energy bills – the Valadao bill among them, and asked for a Conference. Senators Murkowski and Cantwell are attempting to have Senate Conferees named, but continue to face opposition. If not done in early July, the bill cannot be considered before mid-September.

**Feinstein Drought Bill – Senate Opposition to Funding Provisions**

- Senate Energy Markup – slated for late June – postponed. The Energy Committee

noticed the mark of 20+ bills – and originally the Feinstein and Flake bills were on the markup list. The Feinstein bill was then dropped from the list (see below). Markup scheduled for late June was then postponed at the last minute. It may now occur in early July (even that is uncertain).

- Flake bill language on the Colorado River has been substantially modified. Whether or not the Valadao bill language is still included has not been confirmed.
- Feinstein bill – cost was \$1.2 billion. Reports are emerging that Senate Energy Committee Rs are objecting to the cost and will not support a bill with a price tag greater than approximately \$400 million (or, one-third of the original estimate).
- The funding in question was slated for the recycling program, the brackish desal projects and storage projects.

#### **Water Resources Development Act (WRDA) 2016, Senate WaterSense/Water Softener Report Language Approved**

- Previously, it was reported that, “*Chairman Inhofe (R-OK) and Ranking Member Barbara Boxer (D-CA) introduced a new WRDA bill the last week of April and marked it up three days later. The massive bill was moved through the Environment and Public Works Committee in less than an hour (no amendments). The bill authorizes (for the first time), EPA’s WaterSense Program, as highlighted by the WaterReuse Association, to identify and promote water efficient products, buildings...including reuse and recycling technologies.*”
- The bill contained general provisions pertaining to water softener devices that were unacceptable to water agencies in Southern California as well as national water organizations. These machines undermine water recycling and drought initiatives (in Southern California and any other salt-sensitive regions/areas).
- IEUA, LA Sanitation District, WaterReuse Association and ACWA submitted draft language to Senators Inhoff and Boxer for the Committee Report. A “white paper” detailing the agency concerns was submitted to the Committee and the CA Congressional delegation, both Senators and the Governor’s DC office.
- The Committee Report, filed at the end of June, contained the following language as recommended:  
Section 7112. “*When developing the criteria for the WaterSense label, consideration should be given to ensure that the performance criteria do not directly or indirectly contribute to the degradation of waste streams treated by community sewer systems.*”

#### **Tax Reform**

- The Municipal Bonds for America Coalition held House and Senate briefings on municipal bonds (and the threat from various tax proposals) in early June. Both briefings were well-attended. It’s part of the on-going educational effort underway.

- House Speaker Ryan, during June, outlined a six-part “agenda” for the election and 2017 which address poverty, the economy, national defense, Constitution, health care and tax reform.
- The Tax Reform proposal was released on June 24. To advance this part of their proposal, Speaker Ryan and House Ways and Means Chair, Rep. Kevin Brady (R-TX) issued a 36-page “A Better Way for Tax Reform.”
- The new plan proposes to reduce corporate tax rates down to 20% and lower personal tax rates as well. Most importantly, the proposal calls for the elimination of most “*deductions, exemptions and credits*” to achieve the lower rates.
- At risk – the deductibility of municipal bonds.
- If enacted, the practical impact is the cost of money – borrowing – will go up for all of infrastructure (hospitals, airports, schools, transportation, energy, libraries, as well as water and waste water projects and programs and others).
- The Plan, at this juncture, is broad in its presentation and identifies benefits to be achieved, but does not identify specific cuts that would be required.

**Unanticipated Drought-Related Federal Tax (Turf Rebate) Issue**

- Still pending – still unresolved. It’s a significant issue for MWD in particular.

**Drought Monitor**

**Drought in California and the West**

- According to the most recent Drought Monitor (posted June 30), dry conditions are now returning to ALL of California and the Pacific Northwest. This reverses the easing of drought conditions during the past couple of months, particularly in Northern California.
- About half the state remains in Extreme (D-3) and Exceptional (D-4) status – all located in the San Joaquin Valley and portions of coastal Southern California.
- Lake Mead levels are continuing to drop (expected).

# # #

**INFORMATION**

**ITEM**

**2C**



CALIFORNIA STRATEGIES, LLC

Date: June 30, 2016  
To: Inland Empire Utilities Agency  
From: John Withers, Jim Brulte  
Re: June Activity Report

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Listed below is the California Strategies, LLC monthly activity report. Please feel free to call us if you have any questions or would like to receive any more information on any of the items mentioned below.

- Met with Executive Management Team to review priority issues and to discuss activities for June that Executive Staff wanted accomplished
- Discussed Ontario Plume/Title XVI Funding
- Reviewed Chino Basin Water Bank project concept
- Support and advise on IEUA/SBVMWD transfer transaction on an as needed basis.
- Reviewed Water Rates progress with member agencies and Regional Contract renewal.
- Continue to monitor statewide water issues including The Water Fix, water bond, and drought relief act activities. Made recommendation regarding the request for money from various state special funds.
- Monitor Santa Ana Regional Board agenda and issues of interest to IEUA.
- Respond to requests for information from IEUA Directors.

**INFORMATION**  
**ITEM**  
**2D**



**Federal Legislation of Significance**

Bill Number	Sponsor	Title and/or Summary	Summary/Status
H.R.5055 / S.2804	Rep. Mike Simpson / Sen. Lamar Alexander	FY 17 Energy and Water Development and Related Agencies Appropriations bill	<p>The President's budget request to Congress was released on February 9, 2016.</p> <p><b>President' Budget Request for priority programs:</b>            Title XVI: \$21.5 million            WaterSMART: \$23.4 million</p> <p><b>House Energy and Water Appropriations Committee Report:</b>            Title XVI: \$24 million            WaterSMART: \$24 million</p> <p><b>Senate Energy and Water Appropriations Committee Report:</b>            Title XVI: \$21.5 million            WaterSMART: \$23.4 million            Western Drought: \$100 million</p> <p>The Senate Energy and Water Appropriations bill has passed the Senate. The Senate's legislation included additional funding, but no authorization for western drought.</p> <p>Since the House Energy and Water Appropriations bill failed to passed the House on a vote of 112-305, Subcommittee Chairman Mike Simpson (R-ID) has said he is looking for a path to bring the legislation back to the floor without the controversial amendments that caused Republicans to vote against the legislation. It is unclear if the subcommittee will reintroduce legislation, or if a more complicated procedural process will be used to remove provisions without reintroducing the legislation.</p> <p>If the legislation is reintroduced in the House, we anticipate funding levels will remain relatively consistent. While amendments regarding LGBT rights and the North Carolina bathrooms will be removed, we anticipate that the drought provisions (Valadao bill) will continue to be included.</p>
S.2533	Sen. Dianne Feinstein (D-CA)	California Long-Term Provisions for Water Supply and Short-Term Provisions for Emergency Drought Relief Act	<p>A Committee markup was scheduled for June 30 in the Senate Energy and Natural Resources Committee on Senator Feinstein's legislation (and a number of other bills), but was subsequently pulled after the Senate wrapped up work early before the July 4<sup>th</sup> recess.</p>

			<p>Senator Feinstein's latest drought bill received its first hearing in the Water Subcommittee of the Energy and Natural Resources Committee along several other bills, including a western package introduced by Senator Jeff Flake (R-AZ).</p> <p>In testifying in support of her legislation, Senator Feinstein noted that this is the second iteration of her legislation this Congress. She noted that her offices have continued to solicit feedback from federal, state, and local stakeholders. She also mentioned the support from ACWA and 104 local water agencies and individuals who have written letters of support for the legislation.</p>
S.2902	Sen. Jeff Flake (R-AZ)	Western Water Supply and Planning Enhancement Act of 2016	<p>We have been told that Senator Flake has a substitute amendment ready for his drought package. It was originally scheduled to be marked up on June 30<sup>th</sup>, but the markup was postponed when the Senate left early for the July 4<sup>th</sup> recess.</p> <p>Senator Flake introduced his legislation less than a week before the Water Subcommittee of the Senate Energy and Natural Resources Committee held a hearing along other drought bills, including Senator Feinstein's drought package.</p> <p>Senator Flake's bill is cosponsored by several western state Republicans and contains many Republican priorities to deal with drought conditions in their home states. Included in the legislation are reforms at the Bureau of Reclamation along with provisions relating to the Colorado River. It is unclear how the Colorado River provisions will be impacted by the Senator's substitute amendment.</p>
H.R.2898	Rep. David Valadao	Western Water and American Food Security Act of 2015	<p>Passed the House.</p> <p>House Republicans have inserted the Valado bill into several pieces of legislation currently moving through the House. Several provisions from his bill have been included in the Energy and Water Appropriations bill that failed in the House during the last week of May. The legislation was also included in the House Amendment to the Energy Policy Modernization Act. Republicans hope to place the language in several bills in order to conference with the Senate on a drought package before the end of 2016.</p>
S.2012	Sen. Lisa Murkowski	Energy Policy Modernization Act of 2015	<p>The Energy Policy Modernization Act has passed both the House and Senate in different forms, setting up a possible conference committee between the two chambers. While the House has voted to conference with the Senate, the Senate still has not held a vote uncertain what type of agreement could come out of a Conference Committee.</p>

			<p>The original Senate bill was the first broad energy reform policy bill in eight years considered by the Senate. The bill includes a number of policy priorities from both Republicans and Democrats and came as a result of months of negotiations, meetings outreach and other activities aimed at a truly bipartisan bill. The bill instead on fossil fuels and infrastructure: natural gas pipeline permitting, authorizing the main federal conservation fund, job training, updating the grid, as well as a push on energy efficiency. The legislation was brought back to the floor in April after an agreement was reached on amendments. While originally a target for energy tax breaks, those amendments were not added to the legislation.</p> <p>The House took up the legislation during the final week of May. The House inserted its own substitute amendment that included a number of bills that have passed the House but have not advanced in the Senate, including H.R.8—the energy bill that passed the House in 2015 along party lines. The substitute amendment also contains the Valadao drought bill passed by the House in 2015. After passing the substitute amendment, the House voted to go to conference with the Senate.</p>
H.R.4470	Rep. Dan Kildee (D-MI) / Rep. Fred Upton (R-MI)	Safe Drinking Water Act Improved Compliance Awareness Act	<p>The House has approved legislation to clarify the Environmental Protection Agency's authority to notify the public about danger from lead in their drinking water. The bill is the first approved by Congress to respond to the water crisis in Flint, Michigan. The legislation requires the Environmental Protection Agency to notify the public when concentrations of lead in drinking water rise above mandated levels and to create a plan to improve communication between the agency, utilities, states, and consumers. While the bill's authors admit that the new legislation will not prevent future water contamination, they contend that it will prevent the situation from dragging out as has happened in Flint.</p> <p>The legislation has not been taken up in the Senate, but it is expected to receive bipartisan support when Senators vote.</p>
H.R.3143 / S.886	Rep. Jerry McNerney (D-CA) / Sen. Tom Udall (D-MN)	Smart Energy and Water Efficiency Act of 2015	<p>Directs the Department of Energy (DOE) to establish and carry out a smart energy and water efficiency management pilot program to award grants to three to five eligible entities (authorities that provide water, wastewater, or water reuse services) to demonstrate advanced and innovative technology-based solutions that will: (1) increase and improve the energy efficiency of water, wastewater, and water reuse systems to help communities make significant progress in conserving water, saving energy, and reducing costs; (2) support the implementation of innovative processes and the installation of advanced automated systems that provide real-time data on energy and water; and (3) improve energy and water conservation, water quality, and predictive maintenance of energy and water systems, through the use of Internet-connected</p>

			<p>technologies, including sensors, intelligent gateways, and security embedded in hardware.</p> <p>The legislation was referred to the Senate Committee on Energy and Natural Resources. Hearings have also been held.</p>
<p>H.R.5303 / S.2848</p>	<p>Rep. Bill Shuster (R-PA) /Sens. Jim Inhofe (R-OK) and Barbara Boxer (D-CA)</p>	<p>Water Resources Development Act of 2016</p>	<p>The Senate Environment and Public Works Committee has advanced its Water Resources Development legislation for consideration by the Senate. IFS successfully worked with ACWA on language included in the report accompanying the legislation establishing a WaterSense program. The report language is as follows:</p> <p>“Section 7112 authorizes EPA's voluntary WaterSense program that allows water efficient products, buildings, landscapes, facilities, processes, and service to bear a “WaterSense” label.</p> <p>When developing the criteria for the WaterSense label, consideration should be given to ensure that the performance criteria do not directly or indirectly contribute to the degradation of waste streams treated by community sewer systems.”</p> <p>The House Transportation and Infrastructure Committee marked up their version of the Water Resources Development Act and ordered it to be reported by voice vote. The Committee report still has not been filed in the House.</p> <p>Both the House and Senate hope to complete consideration of the WRDA bill this year, putting the legislation back on to an every other year reauthorization.</p> <p>At the end of June, Senator Inhofe went to the Senate floor to urge the legislation’s passage, stating:</p> <p>“So let me close by saying that not passing this bill will result in nearly \$6 billion in navigation and flood control projects to be necessarily delayed or never constructed. There will also be no critical reforms to the Army Corps of Engineers and their policies, no essential affordability reforms for the communities clean water infrastructure mandates, no new assistance for innovative approaches to clean water and drinking water needs to address drought and water supply issues, no resolution of the natural lead emergencies like Flint, Michigan, and no dam rehabilitation programs. So, you know, today I'm asking the leadership and my fellow Republicans, let's seize a valuable opportunity and bring the WRDA bill 2016 to the floor.”</p>

**INFORMATION**

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**2E**

**State Legislation to Watch**

Bill Number	Sponsor	Title and/or Summary	Summary/Status	IEUA Position
AB 1704	Dodd	Water Rights	The Water Rights Permitting Reform Act of 1988 provides that the State Water Resources Control Board is not required to adopt general conditions for small irrigation use until the board determines that funds are available for that purpose and that a registration for small irrigation use pursuant to the act is not authorized until the board establishes general conditions for small irrigation use to protect instream beneficial uses, as specified. This bill would require the board, on or before January 1, 2018, to adopt general conditions that would permit a registrant to construct a facility that would store water for small irrigation use during times of high streamflow in exchange for the registrant reducing diversions during periods of low streamflow, as specified.	6/20 Gut and Amend  Senate Appropriations
AB 1713	Eggman	Sacramento-San Joaquin Delta: peripheral canal	Current law requires various state agencies to administer programs relating to water supply, water quality, and flood management in the Sacramento-San Joaquin Delta. The bill would prohibit the construction of a peripheral canal, as defined, unless expressly authorized by an initiative voted on by the voters of California on or after January 1, 2017, and would require the Legislative Analyst's Office to complete a prescribed economic feasibility analysis prior to a vote authorizing the construction of a peripheral canal.	OPPOSE  DEAD  Failed Assembly Appropriations Committee
AB 1738	McCarty	Building Standards: Dark Graywater	Would define "dark graywater" as a specified wastewater that comes from kitchen sinks and dishwashers. This bill would require the Department of Housing and Community Development, at the next triennial building standards rulemaking cycle, to adopt and submit for approval building standards for the construction, installation, and alteration of dark graywater systems for indoor and outdoor uses. This bill contains other existing laws.	DEAD  Senate Environmental Quality Committee
AB 1749	Mathis	California Environmental Quality Act: exemption: City of Porterville	Would, until January 1, 2021, exempt from the California Environmental Quality Act's requirements a water treatment project determined by the City of Porterville as the best option based on a certain feasibility study, as provided. This bill contains other related provisions.	6/15 Gut and Amend  DEAD  Senate Environmental Quality Committee

AB 1755	Dodd	The Open and Transparent Water Data Act	Would enact the Open and Transparent Water Data Act. The act would require the Department of Water Resources to establish a public benefit corporation that would create and manage (1) a statewide water information system to improve the ability of the state to meet the growing demand for water supply reliability and healthy ecosystems, that, among things, would integrate existing water data information from multiple databases and (2) an online water transfer information clearinghouse for water transfer information that would include a database of historic water transfers and transfers pending responsible agency approval and a public forum to exchange information on water market issues.	SUPPORT  Senate Appropriations Committee
AB 1842	Levine	Water Pollution: Fines	Current law imposes a maximum civil penalty of \$25,000 on a person who discharges various pollutants or other designated materials into the waters of the state. This bill would impose an additional civil penalty of not more than \$10 for each gallon or pound of polluting material discharged. The bill would require that the civil penalty be reduced for every gallon or pound of the illegally discharged material that is recovered and properly disposed of by the responsible party.	Senate Appropriations Committee
AB 1925	Chang	Desalination: Statewide Goal	The Cobey-Porter Saline Water Conversion Law, states the policy of this state that desalination projects developed by or for public water entities be given the same opportunities for state assistance and funding as other water supply and reliability projects, and that desalination be consistent with all applicable environmental protection policies in the state. This bill would establish a goal to desalinate 300,000 acre-feet of drinking water per year by the year 2025 and 500,000 acre-feet of drinking water per year by the year 2030.	DEAD
AB 2206	Williams	Renewable Gas	Would require the State Air Resources Board , in coordination with the Public Utilities Commission and State Energy Resources and Conservation Development Commission, to consider and, as appropriate, adopt a policy or programs to increase the production and use of renewable gas, as specified, generated by either an eligible renewable energy resource that meets the requirements of the California Renewables Portfolio Standard Program or direct solar energy, as specified.	6/25 Gut and Amend  DEAD  Senate Environmental Quality Committee

AB 2304	Levine	California Market Water Exchange	Would establish the California Water Market Exchange, governed by a 5-member board, in the Natural Resources Agency. This bill would require the market exchange, on or before December 31, 2017, to create a centralized water market platform on its Internet Web site that provides ready access to information about water available for transfer or exchange.	DEAD  Failed Passage Assembly Appropriations Committee
AB 2313	Williams	Renewable Natural Gas	The California Global Warming Solutions Act of 2006 establishes the State Air Resources Board as the state agency responsible for monitoring and regulating sources emitting greenhouse gases. This bill would require the state board to study and evaluate a strategy or strategies to increase the instate production and use of renewable natural gas, as defined, to further specified goals.	Senate Appropriations Committee
AB 2488	Dababneh	Protected species: unarmored threespine stickleback: taking or possession.	Would permit the Department of Fish and Wildlife to authorize, under the California Endangered Species Act, the take of the unarmored threespine stickleback ( <i>Gasterosteus aculeatus williamsoni</i> ) attributable to the periodic dewatering, inspection, maintenance, or repair of the Metropolitan Water District of Southern California's Foothill Feeder water supply facility from Castaic Dam to the Joseph Jensen Treatment Plant in the County of Los Angeles, as specified, if certain conditions are satisfied.	Senate Appropriations Committee
AB 2583	Frazier	Sacramento-San Joaquin Delta Reform Act of 2009	Would add a definition of the California Water Fix to the Sacramento-San Joaquin Delta Reform Act of 2009. This bill would eliminate certain provisions applicable to the BDCP and would revise other provisions to instead refer to a new Delta water conveyance project for the purpose of exporting water. This bill would require new Delta water conveyance infrastructure to be considered as interdependent parts of a system and to be operated in a way that maximizes benefits for each of the coequal goals. This bill contains other related provisions and other existing laws.	OPPOSE  DEAD- Did not pass Water, Parks and Wildlife Committee
AB 2702	Atkins	Climate Change	Would state the intent of the Legislature to enact legislation that would continue the work with local governments, state agencies, and others to meet the goals set forth in Governor Brown's Under 2 MOU, which brings together subnational governments willing to commit to either reducing the emissions of greenhouse gases 80% to 95% below 1990 levels by 2050 or achieving a per capita annual emissions target of less than 2 metric tons of carbon dioxide equivalent by 2050.	DEAD  Failed Assembly Appropriations Suspense



ACA-8	Bloom	Local government financing: water facilities and infrastructure: voter approval	Would create an additional exception to the 1% limit for a rate imposed by a city, county, city and county, or special district to service bonded indebtedness incurred to fund the construction, reconstruction, rehabilitation, or replacement of wastewater treatment facilities and related infrastructure, potable water producing facilities and related infrastructure, nonpotable water producing facilities and related infrastructure, and stormwater treatment facilities and related infrastructure, that is approved by 55% of the voters of the city, county, city and county, or special district, as applicable, if the proposition meets specified requirements, and would authorize a city, county, city and county, or special district to levy a 55% vote ad valorem tax. This bill contains other related provisions and other existing laws.	Assembly Rules Committee
SB 163	Hertzberg	Wastewater treatment: recycled water	Would declare that the discharge of treated wastewater from ocean outfalls, except in compliance with the bill's provisions, is a waste and unreasonable use of water in light of the cost-effective opportunities to recycle this water for further beneficial use. This bill, on or before January 1, 2026, would require a wastewater treatment facility discharging through an ocean outfall to achieve at least 50% reuse of the facility's actual annual flow, as defined, for beneficial purposes.	Oppose Unless Amended  DEAD  Withdrawn from committee
SB 885	Wolk	Construction Contracts: Indemnity	Would specify, with certain exceptions, for construction contracts entered into on or after January 1, 2017, that a design professional, as defined, only has the duty to defend himself or herself from claims or lawsuits that arise out of, or pertain or relate to, negligence, recklessness, or willful misconduct of the design professional. Under the bill, a design professional would not have a duty to defend claims or lawsuits against any other person or entity arising from a construction project, except that person's or entity's reasonable defense costs arising out of the design professional's degree of fault, as specified.	OPPOSE  DEAD  Withdrawn from committee
SB 1043	Allen	Renewable gas: biogas and biomethane	Would require the State Air Resources Board to consider and adopt policies to significantly increase the sustainable production and use of renewable gas, as defined, and, in so doing, would require the state board, among other things, to ensure the production and use of renewable gas provides direct environmental benefits and identify barriers to the	DEAD  Failed Senate Appropriations Suspense

			rapid development and use of renewable gas and potential sources of funding.	
SB 1318	Wolk	Local government: drinking water infrastructure or services: wastewater infrastructure or services	Would prohibit a local agency formation commission from authorizing a city or a district to extend drinking water infrastructure or services or wastewater infrastructure or services until it has extended those services to all disadvantaged communities within or adjacent to its sphere of influence, as specified, or has entered into an agreement to extend those services to those disadvantaged communities, unless specified conditions are met. This bill contains other related provisions and other existing laws.	DEAD  Dropped by author

**INFORMATION**  
**ITEM**  
**2F**

# 4th Quarter Planning & Environmental Compliance Update



*Inland Empire Utilities Agency*

A MUNICIPAL WATER DISTRICT

**Sylvie Lee**

IEUA Board of Directors Meeting  
July 2016

# Regulatory Compliance Update

## ■ RWQCB

- All Facilities – 100% compliance
- Facility inspections – no follow-up

## ■ AQMD

- RP-5 SHF – Venting incident on 4/1, 6/14, 6/24
- RP-5 NOV – Resolved on 4/13
- RP-5 SHF Flare – Submitted final compliance letter & excess emission fee on 5/11

## ■ SWRCB-DDW

- CDA1 and GWR – 100% compliance



# Septic to Sewer Feasibility Study

## ■ Project Background

- RMC Water & Environment (RMC) selected for Study
- Evaluate each Contracting Agency service area for septic to sewer conversion

## ■ Progress to Date

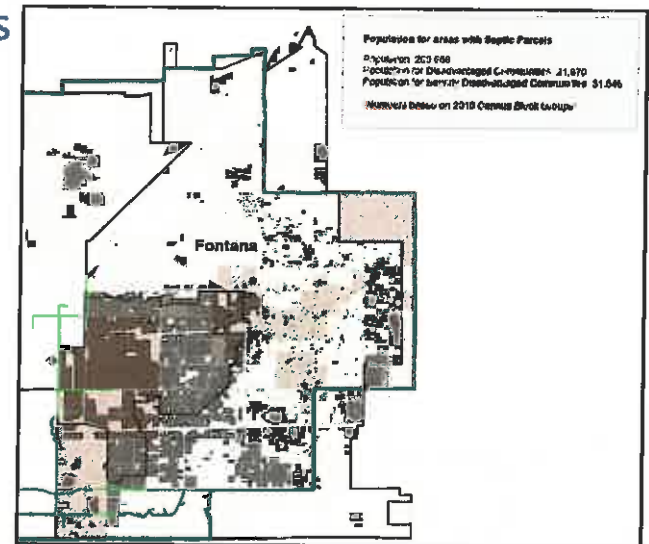
- Data Gathering with Contracting Agencies – (Sewer GIS & Master Plans)
- Identification & Confirmation of Septic System Parcels

## ■ Next Steps

- Defining and Prioritizing Sewer Service Regions

## ■ Project Schedule

- Completion of Feasibility Study - December 2016





# Pretreatment & Source Control

- **Regional System**
  - Local Limits Dioxin Evaluation
  
- **North NRWS**
  - Solids Discrepancy Formula Evaluation
  - Industry Rate Workshop Completed
  
- **South Brine Line**
  - SAWPA Ordinance No. 8
  - OCSD Local Limits Revision
  - Capacity Pool
  - TSS Solids Imbalance



# Planning

- **Integrated Resources Plan**
  - IRP Phase 1 finalized and posted on website
  - Complete Programmatic EIR: summer 2016
  - Commence Phase 2: summer 2016
- **Water Use Efficient Business Plan**
  - Plan finalized in May 2016
  - Board Adoption – June 15, 2016
- **Prado Basin Adaptive Management Plan**
  - AMP finalized May 2016
- **Santa Ana River Habitat Conservation Plan (Jan 2017)**
  - Hydraulic modeling completed
  - Assessment of impacts underway





# Water Resources Activities

- **2015 Urban Water Management Plan (UWMP) Update**
  - Plan finalized in May 2016
  - Board Adoption – June 15, 2016
  
- **SAWPA Proposition 84 DWR Grant –Turf Removal & Aerial Mapping**
  - Staff continues to submit monthly turf invoices to secure potential unspent funds
  - The Aerial Mapping Project has been completed and data is being organized for distribution to IEUA member agencies
  
- **IEUA Water Purchase Agreements**
  - CVWD agreement: purchased 2,022 AF to date
  - WMWD agreement: for shared use of IW service connection – drafting

# Agriculture Conservation

- **USDA grant application for Ag conservation submitted for \$400,000**
- **Weather Station will be installed for California Institute for Men (CIM)**
  - Received approval from State/DWR
  - Used to calculate evapotranspiration (ET) for service area water budgets
- **Ag Pool assistance with promoting on-site farm upgrades**