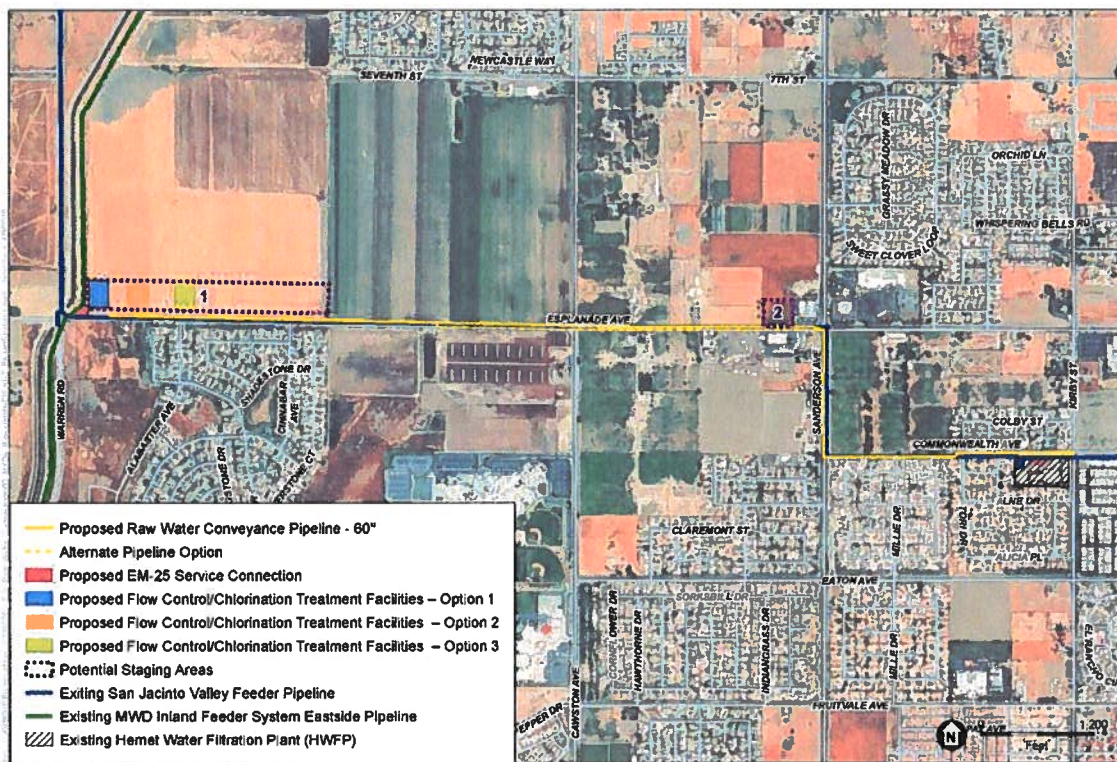




— BUREAU OF —  
RECLAMATION

# National Environmental Policy Act Finding of No Significant Impact

San Jacinto Valley Raw Water Conveyance Facilities Project  
Riverside County, California



SOURCE Mapbox

San Jacinto Valley Raw Water Conveyance  
**Figure 1-2**  
Project Features



## **Mission Statements**

The Department of the Interior (DOI) conserves and manages the Nation's natural resources and cultural heritage for the benefit and enjoyment of the American people, provides scientific and other information about natural resources and natural hazards to address societal challenges and create opportunities for the American people, and honors the Nation's trust responsibilities or special commitments to American Indians, Alaska Natives, and affiliated island communities to help them prosper.

The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.



# BUREAU OF RECLAMATION

## National Environmental Policy Act Finding of No Significant Impact

No. 18-SCAO-007-FONSI

San Jacinto Valley Raw Water Conveyance Facilities Project, Phase 1 Construction  
Riverside County, California

The Bureau of Reclamation is providing a Drought Resiliency Grant to the Eastern Municipal Water District to design and construct the San Jacinto Valley Raw Water Conveyance Facilities Project in Riverside County, California. The project will install a 2.25-mile pipeline connecting the existing Inland Feeder System Eastside Pipeline to the existing San Jacinto Valley Feeder Pipeline in the City of Hemet. The infrastructure will convey imported water to recharge the San Jacinto Groundwater Basin.

Based on our review of the Initial Study and Mitigated Negative Declaration for the San Jacinto Valley Raw Water Conveyance Project, California State Clearinghouse No.2019049073, we have determined that the financial assistance does not constitute a major federal action which would significantly affect the quality of the human environment within the meaning of Section 102(2)(C) of the National Environmental Policy Act of 1969. Accordingly, preparation of an environmental impact statement is not required.

Prepared By: NEAL PRASAD (Affiliate) Digitally signed by NEAL PRASAD (Affiliate)  
Date: 2021.06.11 12:20:58 -07'00' \_\_\_\_\_ Date: \_\_\_\_\_  
Neal Prasad, Environmental Intern

Recommended: DOUGLAS MCPHERSON Digitally signed by DOUGLAS MCPHERSON  
Date: 2021.06.11 13:55:29 -07'00' \_\_\_\_\_ Date: \_\_\_\_\_  
Doug McPherson, Environmental Protection Specialist

Reviewed By: LESLIE CLEVELAND Digitally signed by LESLIE  
CLEVELAND  
Date: 2021.06.11 14:39:41 -07'00' \_\_\_\_\_ Date: \_\_\_\_\_  
Leslie Cleveland, Water Resources Manager

Approved: *John E. Simes, Jr.* Digitally signed by John E. Simes, Jr., (Acting) Area Manager  
Southern California Area Office \_\_\_\_\_ Date: JUNE 14, 2021



Grant Agreement No. R18AP00079 provides Drought Resiliency Project funds for the Eastern Municipal Water District (Eastern) to construct Phase 1 of the San Jacinto Valley Raw Water Conveyance Facilities Project, providing dedicated raw water conveyance for groundwater recharge operations. The facilities will be used to recharge the San Jacinto Groundwater Basin when surplus State Water Project supplies are available from the Metropolitan Water District of Southern California (MWD).

The project is an element of a larger program to replenish the groundwater basin using imported water from the State Water Project: the San Jacinto Valley Water Banking – Enhanced Recharge and Recovery Program will recharge water into the aquifer when available during years with normal or above average water supplies so that Eastern will be better prepared for drought conditions.

## **PURPOSE AND NEED**

The objective of the project is to increase water supply reliability during droughts and emergencies. The project will build long-term resilience to drought by improving the ability to store surplus imported water during wet years for use during drought years.

## **AUTHORITY**

Financial assistance is authorized by Section 9504(a) of the Secure Water Act, Subtitle F of Title IX of the Omnibus Public Land Management Act of 2009, Public Law 111-11 (42 USC 10364).

## **PROJECT DESCRIPTION**

The grant funding will be used to design and construct a connection to MWD's existing Inland Feeder System Eastside Pipeline (EM-25 service connection), a flow control facility, a chlorination treatment facility, and a 60-inch diameter transmission pipeline to convey raw water from the EM-25 connection to the existing 33-inch diameter San Jacinto Valley Feeder Pipeline near the intersection of Kirby Street and Commonwealth Avenue next to the Hemet Water Filtration Plant. The project includes minor modifications to the existing Commonwealth Booster Pump Station at the Hemet Water Filtration Plant.

The EM-25 service connection will be within MWD-owned property (APN 432-260-012) along Esplanade Avenue near the intersection of Warren Road in the City of San Jacinto. Service connection facilities will be located primarily within sub-surface vault structures. The new connection will consist of a turnout to allow transmission of raw water from MWD's 145.5-inch diameter Inland Feeder System Eastside Pipeline to the new raw water conveyance pipeline. The turnout includes underground lighting, valves, a flow meter, and a sump pump wet well.

A new meter will be installed to provide low flow connection to ensure hydraulic reliability of the proposed pipeline. The meter, as well as lighting and valves, will be installed at the Devil Canyon<sup>1</sup> facility north of the city of San Bernardino and will include mechanical modifications and no ground-disturbing activities.

The flow control facility will be located on a 2.2-acre parcel (APN 432-260-023) along Esplanade Avenue near the EM-25 service connection. The facilities will occupy 1.4 acre; the remainder of the parcel will be reserved for future facilities to support the raw water pipeline. The flow control facility consists of a reinforced concrete slab with above-grade flow control valves, an analyzer, piping, and lighting. The area around the flow control facility will be graded, paved, and surrounded by an 8-foot chain link fence or concrete block perimeter wall.

The chlorination treatment facility will be adjacent to the flow control facility. The chlorination treatment facility will consist of one 5,000-gallon bulk sodium hypochlorite storage tank and chemical injection pumps set on a concrete slab with a perimeter containment curb, a 12-foot high steel shade structure and chain-link fenced enclosure. The injection pumps will be enclosed within a structure to reduce noise.

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<sup>1</sup> Devil Canyon is a State Water Project facility at the south end of the San Bernardino Tunnel from Silverwood Reservoir.

The raw water conveyance pipeline will be constructed within public rights-of-way or within property or easements currently owned or to be acquired by Eastern. Appurtenant features (isolation valves, air vacuum/air release assemblies, blow-off assemblies, cathodic protection assemblies, manways and access manholes, and other appurtenances as required) will be installed both above and below-grade along the pipeline route. The raw water conveyance pipeline consists of 2.25 miles of 60-inch diameter welded steel pipeline connecting to the existing San Jacinto Valley Feeder Pipeline in Commonwealth Avenue downstream of the intake to the Hemet Water Filtration Plant.

The San Jacinto Valley Feeder Pipeline conveys water to existing recharge basins 4.5 miles to the east. The raw water will either be gravity fed when supported by hydraulic gradient conditions at the EM-25 service connection or pumped through the existing Commonwealth Booster Pump Station at the Hemet Water Filtration Plant. The raw water conveyance pipeline will connect to the Commonwealth Booster Pump Station by a new 33-inch-diameter aboveground suction header.

Ground-disturbing activities include excavation for EM-25 and construction of the 60-inch transmission pipeline and appurtenances. The project will have a construction footprint of approximately 9 acres.

### **ADOPTION OF EXISTING ENVIRONMENTAL DOCUMENT**

The National Environmental Policy Act (NEPA) requires review of a proposed Federal action to determine its impact on the human environment. Council on Environmental Quality (CEQ) regulations direct Federal agencies to cooperate with State and local agencies to the fullest extent possible to reduce duplication between NEPA and State and local requirements (40 CFR 1506.2). Department of the Interior regulations for implementing NEPA encourage tiering of environmental documents and provide for adoption of existing environmental documents if, upon evaluation by a responsible official, it is found to comply with relevant provisions of the CEQ regulations.

Eastern prepared a project-level initial study for the Phase 1 San Jacinto Valley Raw Water Conveyance Facilities Project (SCH no. 2019049073) and adopted a Mitigated Negative Declaration, finding that preparation of an environmental impact report is not required under the California Environmental Quality Act (CEQA).<sup>2</sup> On June 19, 2019, Eastern's Board of Directors certified the Initial Study, adopted the Mitigated Negative declaration, and approved the Mitigation Monitoring and Reporting Program. Notice of Determination was filed on June 21, 2019.

Reclamation staff reviewed the initial study and concluded that it adequately identifies and discloses the reasonably foreseeable environmental effects of the action. We adopt the document in accordance with regulations for implementing NEPA promulgated by the CEQ at 40 CFR 1506.3 and by the Department of the Interior at 43 CFR 46.320(a).

### **SUMMARY OF FINDINGS**

The initial study concluded that the project would not create significant environmental impacts. Mitigation measures were identified to reduce impacts for Aesthetics, Air Quality; Biological Resources; Cultural Resources; Geology, Soils and Seismicity; Noise; Transportation; and Wildfire.

### **OTHER FEDERAL CONSIDERATIONS**

#### Clean Air Act

The South Coast air basin is designated nonattainment for PM-2.5 and extreme nonattainment for ozone. The air basin is in attainment/maintenance for PM10, CO and NO<sub>2</sub>; and attainment for SO<sub>2</sub> and lead. The initial study concluded that operational emissions will be negligible. Estimated construction-phase emissions will not exceed *de minimis* thresholds at 40 CFR 93.153(b).

<sup>2</sup> Eastern previously prepared a program-level Environmental Impact Report (SCH# 2015071002) for the Enhanced Recharge and Recovery Program, finding that temporary construction-phase air and noise impacts would be significant under CEQA. All other impacts could be mitigated to a less than significant level.

Clean Air Act general conformity regulations [40 CFR 93.158(a)(5)(v)] provide that regional water projects sized to meet population projections in the State Implementation Plan (SIP) conform or are consistent with the SIP if the requirements of 40 CFR 93.158(c) are met. Conformity determination is not required.

#### Endangered Species Act

The action will not affect federal threatened or endangered species or critical habitats. A biological resource reconnaissance was prepared. No federally listed species or critical habitat area were identified within the action area. There will be no direct impacts to native habitat areas.

#### National Historic Preservation Act

The pipeline alignment crosses but will not affect the first San Diego aqueduct. No other resources eligible for the National Register of Historic Places are within the Area of Potential Effect.

#### Migratory Bird Treaty Act

The project does not involve removal of any native vegetation that could support migratory bird nests. Adverse effects on migratory birds are not anticipated. There will be no take of migratory birds or their nests. Vegetation clearing will occur outside of the bird nesting season. Biological monitoring is required before construction activities during the nesting season.

#### Water Resources

Eastern has access to groundwater from both the East (Hemet/San Jacinto area) and West San Jacinto Basins. The east portion of the San Jacinto groundwater basin is adjudicated. The Hemet/San Jacinto Water Management Plan was completed in 2007 and a Stipulated Judgment was finalized in 2013, adopting the Groundwater Management Plan and creating the Hemet-San Jacinto Watermaster. Long term groundwater management includes plans for artificial recharge using MWD replenishment water.

The Hemet Water Filtration Plant and the recharge facilities currently share the same MWD connection and supply pipeline. The project will increase the imported water available for recharge by separating the MWD connection and supply pipeline so that each facility has its own discrete source. The project will supply an additional 7,000 acre-feet per year (AFY) for recharge during wet years. The capacity of the existing recharge facilities (about 30,000 AFY) is adequate to handle the additional recharge.

#### Farmland Protection Policy Act

No Prime or Unique Farmland or Farmland of Statewide Importance will be permanently converted to non-agricultural use. The flow control facility and chlorination treatment facility will permanently convert 1.4 acres of Locally Important Farmland. Impacts from staging areas within Prime Farmland will be temporary and will not permanently convert Prime Farmland to non-agricultural use. The project is within the Hemet, CA Urbanized Area mapped by the U.S Census Bureau.<sup>3</sup>

#### Clean Water Act

Construction will comply with two National Pollutant Discharge Elimination System (NPDES) permits:

*Groundwater Dewatering Permit:* General Waste Discharge Requirements for Discharges to Surface Waters that Pose an Insignificant (*de minimis*) Threat to Water Quality, Santa Ana Regional Water Quality Control Board Order no. R8-2020-0006, NPDES permit no. CAG998001.

*Construction Storm Water Permit:* General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, State Water Resources control board Adopted Order 2009-0009-DWQ (as amended by 2010-0014-DWQ and 2012-0006-DWQ), NPDES permit no. CAS000002.<sup>4</sup>

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<sup>3</sup> "Farmland" does not include land already in or committed to urban development or water storage. Farmland already in urban development includes lands identified as "urbanized area" on the Census Bureau Map [7 CFR 658.2(a)].

<sup>4</sup> The State Water Resources Control Board is currently receiving public comments on the proposed reissuance of the statewide NPDES Construction Stormwater General Permit CAS00002. The Construction General Permit Order 2009-0009-DWQ, has been administratively extended until a new order is adopted and becomes effective

Wetlands and Floodplains

No jurisdictional wetlands will be disturbed. Project facilities are located outside of the 100-year flood zone. Project facilities will not impede or redirect flood flows.

Socioeconomic Resources

The project will not have significant social or economic effects. The project will not induce population growth. No housing or people will be displaced. No communities will be divided. No effects to public health and safety were identified.

Environmental Justice

No impacts relevant to Environmental Justice were identified. The raw water conveyance pipeline will be within a community designated as disadvantaged by the California Department of Water Resources. Disproportionately high and adverse human health or environmental effects are not anticipated. The additional water benefits from the project will be available to all customers in Eastern's service area, which includes both low income and minority populations.

Indian Trust Assets

The existing recharge basins were constructed to help meet the water rights of the Soboba Band of Luiseño Indians.<sup>5</sup> The Soboba Band of Luiseño Indians Settlement Act (Public Law 110-297) became law on July 31, 2008. The Secretary of the Interior signed a settlement agreement on October 18, 2008. The Tribal water rights will not be affected.

No other Indian trust assets have been identified in the project area. The project will not limit access to and ceremonial use of Indian sacred sites or result in other impacts on tribal lands.

Wild and Scenic Rivers

No Wild and Scenic Rivers or waterways listed on the National Rivers Inventory are involved. Bautista Creek, Fuller Mill Creek and the North Fork of the San Jacinto River are designated Wild and Scenic. All three tributaries are in the San Jacinto Mountains upstream of the project area.

Coastal Zone Management Act

The project is not within the California Coastal Zone Boundary.

Coastal Barrier Resources Act

The federal expenditure will not encourage development or modification of coastal barriers. The project is not within any units of the Coastal Barrier Resources System. The Coastal Barrier Resources Act applies on the Atlantic, Gulf, and Great Lakes coasts. No system units are located along the Pacific coast.

Sole Source Aquifers

The San Jacinto groundwater basin is not an EPA-designated sole source aquifer.

Noxious Weeds or Invasive Species

Project activities will not contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species. Project components will be on disturbed, developed, and ornamental plant-covered areas and will not disturb native vegetated communities. Project components will not introduce non-native invasive species.

**AGENCY CONSULTATION AND COORDINATION**

California State Historic Preservation Officer (SHPO)

A finding of "No Adverse Effect to Historic Properties" was submitted to the SHPO on October 19, 2020. No objection has been received.

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<sup>5</sup> The Army Corps of Engineers issued Clean Water Act permit no. SPL-2004-1197 for the Hemet/San Jacinto Integrated Recharge and Recovery Project on July 18, 2007, after completing an Environmental Impact Statement (CEQ# 70136). The Record of Decision was signed on June 21, 2007.



Fish and Wildlife Service

Consultation under section 7 of the Endangered Species Act is not required.

California Coastal Commission

Coastal Zone Management Act consistency certification is not required.

Department of Agriculture, Natural Resources Conservation Service (NRCS)

Consultation with the NRCS District Conservationist is not required.

Tribal Consultation

The cultural resources consultant reached out to Tribes recommended by the California Native American Heritage Commission. Most tribes deferred to the Soboba Band of Luiseño Indians. Eastern completed a consultation with the Soboba Band of Luiseño Indians under California law AB 52. The Southern California Area Office will also invite the Soboba Band of Luiseño Indians to consult.

**ENVIRONMENTAL COMMITMENTS**

The Mitigation Monitoring and Reporting Program adopted by the Eastern's Board of Directors is attached. The CEQA mitigations are self-imposed by Eastern and are considered ameliorative design elements per 43 CFR 46.130(b). No additional environmental commitments are required by the Bureau of Reclamation.

**REFERENCES**

San Jacinto Valley Raw Water Conveyance Facilities Project Initial Study/Mitigated Negative Declaration (SCH No. 2019049073), ESA, Los Angeles, CA, June 2019.

**ATTACHMENTS**

Mitigation Monitoring and Reporting Program



**TABLE 5-1  
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE SAN JACINTO VALLEY RAW WATER CONVEYANCE FACILITIES PROJECT**

Mitigation Measure	Monitoring / Reporting Action	Monitoring Timing	Responsible Person(s)	Verification of Compliance (Date/Responsible Person)
<b>Aesthetics</b>				
<p><b>AES-1: Design of Aboveground Structures:</b> EMWD shall ensure that the design of all aboveground structures (the flow control facility, chlorination treatment facility, and appurtenant facilities associated with the pipeline) shall be consistent with the general building style of the existing site and surroundings to ensure compatibility with visual character of the immediate neighborhood while accommodating necessary infrastructure.</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in design specifications</li> <li>• Retain a copy of design specifications in project file</li> </ul>	<ul style="list-style-type: none"> <li>• During preparation of design contractor specifications (mitigation measure in specifications)</li> <li>• During/after construction (retain documentation)</li> </ul>	<ul style="list-style-type: none"> <li>• EMWD Engineer and Design Contractor</li> <li>• EMWD Engineer</li> </ul>	
<p><b>AES-2: Lighting.</b> All nighttime construction lighting and temporary or permanent lighting installed on new facilities shall be attached to motion sensors and shielded and directed downward to avoid light spillage onto neighboring properties.</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in design specifications and construction contractor specifications</li> <li>• Conduct periodic monitoring of mitigation commitments during construction</li> <li>• Retain a copy of design specifications and construction monitoring report in project file</li> </ul>	<ul style="list-style-type: none"> <li>• During preparation of design contractor specifications and construction contractor specifications (mitigation measure in specifications)</li> <li>• During Construction (monitoring)</li> <li>• During/after construction (retain documentation)</li> </ul>	<ul style="list-style-type: none"> <li>• EMWD Engineer, Design Contractor, and Construction Contractor</li> <li>• EMWD Planner</li> <li>• EMWD Engineer</li> </ul>	
<b>Air Quality</b>				
<p><b>AQ-1: Tier 4 Rated Engines.</b> EMWD shall require the construction contractor to use off-road equipment that meets the EPA certified Tier 4 final engines or engines that are certified to meet or exceed the emission ratings for EPA Tier 4 final or interim engines for all construction equipment and vehicles used for the Project.</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contracting specification</li> <li>• Conduct periodic monitoring of mitigation commitments during construction.</li> </ul>	<ul style="list-style-type: none"> <li>• During preparation of construction contractor specifications (mitigation measure in specifications)</li> </ul>	<ul style="list-style-type: none"> <li>• EMWD Engineer and Construction Contractor</li> <li>• EMWD Planner</li> <li>• EMWD Engineer</li> </ul>	

Attachment: Exhibit A - IS/MND (3868) : Adopt the CEQA Determination for the San Jacinto Valley Raw

Mitigation Measure	Monitoring / Reporting Action	Monitoring Timing	Responsible Person(s)	Verification of Compliance (Date/Responsible Person)
<p><b>AQ-2: Construction Schedule Adjustment.</b> During the mass grading and excavation phase associated with construction of the EM-25 service connection, flow control facility, and chlorination treatment facility (estimated as two weeks of the total construction schedule), construction of the pipeline shall not occur along Esplanade Avenue west of Cawston Avenue North. This minimizes exposure of sensitive residential receptors along Esplanade Avenue to PM10 and PM2.5 emissions from the combination of these activities.</p>	<ul style="list-style-type: none"> <li>Retain construction monitoring report in project file.</li> </ul>	<ul style="list-style-type: none"> <li>During construction (monitoring)</li> <li>During/after construction (retain documentation)</li> </ul>	<ul style="list-style-type: none"> <li>EMWD Engineer and Construction Contractor</li> <li>EMWD Planner</li> <li>EMWD Engineer</li> </ul>	
	<ul style="list-style-type: none"> <li>Include mitigation measure in construction contracting specification</li> <li>Conduct periodic monitoring of mitigation</li> <li>Retain construction monitoring report in project file</li> </ul>	<ul style="list-style-type: none"> <li>During preparation of construction contractor specifications (mitigation measure in specifications)</li> <li>During the mass grading and excavation phase (monitoring)</li> <li>During/after construction (retain documentation)</li> </ul>		

**Biological Resources**

<p><b>BIO-1: Focused Burrowing Owl Surveys.</b> Focused protocol surveys for burrowing owl shall be conducted prior to construction of the EM-25 service connection, flow control facility, chlorination treatment facility, pipelines to be installed in bare undisturbed ground, and all staging areas used for the Project. The focused protocol surveys shall be conducted by a knowledgeable biologist following protocol outlined in the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012). If burrowing owl is observed during the focused surveys and found to be potentially impacted by the Proposed Project, additional avoidance and mitigation measures will be required. Avoidance measures include constructing Proposed Project facilities outside the breeding season, establishing a suitable buffer around an active burrow, restricting activities around certain times of year, and excluding and relocating owls. A Burrow Exclusion Plan approved by CDFW will be required to implement exclusion and relocation. Permanent impacts to land that previously contained burrowing owls may also require conservation of mitigation lands to offset the impact to burrowing owl and its habitat. The conservation of mitigation lands will be determined through consultation with CDFW.</p>	<ul style="list-style-type: none"> <li>Include mitigation measure in construction contracting specification</li> <li>Retain a qualified biologist to conduct focused protocol survey for burrowing owl</li> <li>If burrowing owl is observed, implement avoidance measures (which could include implementation of a Burrow Exclusion Plan and/or conservation of mitigation lands), document effort, and consult with CDFW, as applicable</li> <li>Retain copies of all surveys and reports in project file</li> </ul>	<ul style="list-style-type: none"> <li>During preparation of construction contractor specifications (mitigation measure in specifications)</li> <li>Prior to grubbing and trenching (Survey)</li> <li>During Construction (Avoidance measures, as needed)</li> <li>During/after construction (retain documentation)</li> </ul>	<ul style="list-style-type: none"> <li>EMWD Engineer</li> <li>EMWD Planner or EMWD Engineer</li> <li>EMWD Planner, EMWD Engineer, and Construction Contractor</li> <li>EMWD Engineer</li> </ul>	
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Attachment: Exhibit A - IS/MND (3868) : Adopt the CEQA Determination for the San Jacinto Valley Raw

Mitigation Measure	Monitoring / Reporting Action	Monitoring Timing	Responsible Person(s)	Verification of Compliance (Date/Responsible Person)
<p><b>BIO-2: Preconstruction Surveys.</b> EMWD shall conduct pre-construction surveys for coastal whiptail to determine if this species is present within the areas to be used for the EM-25 service connection, flow control facility, chlorination treatment facility, pipelines to be installed in bare undisturbed ground, and all staging areas used for the Project. If this species is present, construction best management practices (BMPs) and Worker Environmental Awareness Program (WEAP) training shall be implemented during construction activities to avoid and minimize potential impacts to these species. Example BMPs to be implemented during construction include limiting vehicle speed onsite to 15 miles per hour, covering trenches and open pits, if trenches are left open adding wooden ramps in the trench to allow small mammals to escape, temporarily fencing work areas using silt fencing, and cleaning up all trash and debris daily. Additional avoidance measures may include establishing a buffer around the species an onsite monitoring should a population of a special-status species be found. Additionally, the WEAP training will be conducted by a knowledgeable biologist to identify species that could be impacted and summarize the construction BMPs to be implemented. Construction personnel will be instructed to not directly harm any special-status species onsite by halting activities until the species can move to offsite areas or contact a qualified biologist to move the species out of harm's way.</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contracting specification</li> <li>• Retain a qualified biologist to conduct survey for coastal whiptail</li> <li>• Conduct construction BMPs and WEAP training if coastal whiptail is observed</li> <li>• Retain copies of all surveys and reports in project file</li> </ul>	<ul style="list-style-type: none"> <li>• During preparation of construction contractor specifications (mitigation measure in specifications)</li> <li>• Prior to grubbing and trenching activities (Survey)</li> <li>• During construction (BMPs and WEAP, as needed)</li> <li>• During/after construction (retain documentation)</li> </ul>	<ul style="list-style-type: none"> <li>• EMWD Engineer</li> <li>• EMWD Planner or EMWD Engineer</li> <li>• EMWD Engineer and Construction Contractor</li> <li>• EMWD Engineer</li> </ul>	
<p><b>BIO-3: Nesting Birds.</b> Construction of the Proposed Project shall avoid the general avian nesting season of February through August. If construction of Proposed Project facilities that contain or are immediately adjacent to suitable nesting habitat must occur during the general avian nesting season, a pre-construction clearance survey should be conducted within 10 days prior to the start of construction activities to determine if any active nests or nesting activity is occurring on or within 500 feet of the Proposed Project. If no sign of nesting activity is observed, construction may proceed without potential impacts to nesting birds.</p> <p>If an active nest is observed during the pre-construction clearance survey, an adequate buffer should be established around the active nest depending on sensitivity of the species and proximity to Proposed Project impact areas. Typical buffer distances include up to 300-feet for passerines and up to 500-feet for raptors, but can be reduced as deemed appropriate by a monitoring biologist. Onsite construction monitoring may also be required to ensure that no direct or indirect impacts occur to the active nest. Proposed Project activities may encroach into the buffer only at the discretion of the monitoring biologist. The buffer should remain</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contracting specification</li> <li>• If construction occurs between February and August, retain a qualified biologist to conduct nesting bird survey, and establish appropriate buffer (fencing or flagging, or other method determined by qualified biologist), if necessary</li> <li>• Conduct construction monitoring</li> <li>• Retain copies of all surveys and reports in project file</li> </ul>	<ul style="list-style-type: none"> <li>• During preparation of construction contractor specifications (mitigation measure in specifications)</li> <li>• Prior to construction (nesting bird survey and buffer establishment)</li> <li>• During construction (monitoring of active nests and buffers, if applicable, on a weekly basis, or</li> </ul>	<ul style="list-style-type: none"> <li>• EMWD Engineer</li> <li>• EMWD Planner or EMWD Engineer and Construction Contractor</li> <li>• EMWD Planner</li> <li>• EMWD Engineer</li> </ul>	

Attachment: Exhibit A - IS/MND (3868) : Adopt the CEQA Determination for the San Jacinto Valley Raw

Mitigation Measure	Monitoring / Reporting Action	Monitoring Timing	Responsible Person(s)	Verification of Compliance (Date/Responsible Person)
<p>in place until the nest is no longer active as determined by the monitoring biologist.</p>		<p>as determined by qualified biologist)</p> <ul style="list-style-type: none"> <li>• During/after construction (retain documentation)</li> </ul>		
<b>Cultural Resources</b>				
<p><b>CUL-1: Retention of Qualified Archaeologist.</b> Prior to the start of any ground disturbing activities, a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology (U.S. Department of the Interior 2008) shall be retained by EMWD to carry out all mitigation measures related to cultural resources.</p>	<ul style="list-style-type: none"> <li>• Retain a qualified archaeologist to carry out all mitigation measures</li> </ul>	<ul style="list-style-type: none"> <li>• Prior to construction</li> </ul>	<ul style="list-style-type: none"> <li>• EMWD Planner or EMWD Engineer</li> </ul>	
<p><b>CUL-2: Cultural Resources Sensitivity Training.</b> Prior to start of any ground-disturbing activities, the qualified archaeologist shall conduct cultural resources sensitivity training for all construction personnel associated with the Project. Construction personnel shall be informed of the types of cultural resources that may be encountered during construction, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains. EMWD shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance</p>	<ul style="list-style-type: none"> <li>• Retain a qualified archaeologist to conduct cultural resources sensitivity training for all construction personnel</li> <li>• Retain documentation demonstrating the attendance of all construction personnel in training</li> </ul>	<ul style="list-style-type: none"> <li>• Prior to grubbing and trenching activities (sensitivity training)</li> <li>• During/after construction (retain documentation)</li> </ul>	<ul style="list-style-type: none"> <li>• EMWD Planner or EMWD Engineer and Construction Contractor</li> <li>• EMWD Engineer</li> </ul>	
<p><b>CUL-3: Construction Monitoring.</b> An archaeological monitor (working under the direct supervision of the qualified archaeologist) and a Native American monitor shall observe all ground-disturbing activities, including but not limited to brush clearance, vegetation removal, grubbing, grading, and excavation. The qualified archaeologist, in coordination with EMWD and the Native American monitor(s), may reduce or discontinue monitoring if it is determined that the possibility of encountering buried archaeological deposits is low based on observations of soil stratigraphy or other factors. Archaeological monitoring shall be conducted by an archaeologist familiar with the types of archaeological resources that could be encountered within the Project area. The Native American monitor shall be from a tribe that is culturally and geographically affiliated with the Project area (according to the California Native American Heritage Commission's contact list for this Project). The archaeological and Native American monitor(s) 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</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contracting specification</li> <li>• Retain an archaeological and Native American monitors to conduct monitoring of all ground disturbance</li> <li>• Require daily logs and a final monitoring report, that shall be submitted to EMWD, Native American groups, and EIC.</li> </ul>	<ul style="list-style-type: none"> <li>• During preparation of construction contractor specifications (mitigation measure in specifications)</li> <li>• Prior to grubbing and trenching activities (retain monitors)</li> <li>• During/after construction (daily logs, monitoring report, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>• EMWD Engineer</li> <li>• EMWD Planner or EMWD Engineer and Construction Contractor</li> <li>• EMWD Engineer, Construction Contractor, and Environmental Monitor</li> </ul>	

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<p>determined appropriate treatment (as prescribed in CUL-4). The archaeological 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 EMWD and any Native American groups who request a copy. The qualified archaeologist shall submit a copy of the final report to the California Historic Resources Information System (CHRIS) Eastern Information Center (EIC).</p>				
<p><b>CUL-4: Unanticipated Discoveries.</b> In the event of the unanticipated discovery of archaeological materials, all work shall immediately cease in the area (within approximately 100 feet) of the discovery until it can be evaluated by the qualified archaeologist. Construction shall not resume until the qualified archaeologist has conferred with EMWD, and the appropriate Native American representatives for prehistoric resources, on the significance of the resource.</p> <p>If it is determined that the discovered archaeological resource constitutes a historical resource or a unique archaeological resource under CEQA, avoidance and preservation in place is the preferred manner of mitigation. 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, an Archaeological Resources Treatment Plan shall be prepared and implemented by the qualified archaeologist in consultation with EMWD that provides for the adequate recovery of the scientifically consequential information contained in the archaeological resource. The qualified archaeologist and EMWD 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 those that are scientifically important, are considered.</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contracting specification</li> <li>• Retain a qualified archaeologist to coordinate with EMWD and Native American representatives on developing an appropriate treatment plan for discovered resources, if any</li> <li>• If found, document and retain records regarding discovery of archaeological resources</li> </ul>	<ul style="list-style-type: none"> <li>• During preparation of construction contractor specifications (mitigation measure in specifications)</li> <li>• During construction (coordinate regarding treatment plan)</li> <li>• During/after construction (retain documentation)</li> </ul>	<ul style="list-style-type: none"> <li>• EMWD Engineer</li> <li>• EMWD Engineer, EMWD Planner, and Construction Contractor</li> <li>• EMWD Engineer</li> </ul>	
<p><b>CUL-5: Artifact Disposition.</b> Prior to the start of Project construction, EMWD shall execute an agreement with the Soboba Band of Luiseño Indians regarding the final disposition and reburial of inadvertently discovered prehistoric/Native American artifacts that are culturally relevant to the tribe. The agreement shall identify a mutually acceptable location in the vicinity of the Project area on EMWD-owned land where these types of artifacts will be reburied in perpetuity. The location shall be kept confidential and shall not be subject to further disturbance and filed with the California Native American Heritage Commission's</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contracting specification</li> <li>• Execute Agreement with Soboba Band of Luiseño Indians regarding location of reburied prehistoric artifacts</li> </ul>	<ul style="list-style-type: none"> <li>• During preparation of construction contractor specifications (mitigation measure in specifications)</li> <li>• During construction</li> </ul>	<ul style="list-style-type: none"> <li>• EMWD Engineer</li> <li>• EMWD Engineer, EMWD Planner, and Construction Contractor</li> <li>• EMWD Engineer and EMWD Planner</li> </ul>	

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<p>Sacred Lands File. The agreement shall only be applicable to prehistoric artifacts and/or features that are not associated with inhumations and/or grave goods, the treatment of which is subject to California State law as prescribed in Mitigation Measure CUL-6. Prior to reburial, the treatment and reporting of significant discoveries shall be conducted in accordance with Mitigation Measure CUL-3, which will document the location of the discoveries as well as their reburial location in the monitoring report which will be filed with the Eastern Information Center. Prior to the reburial of the inadvertent discoveries, the qualified archaeologist shall be allowed an adequate amount of time to collect the scientifically consequential information associated with the discoveries prior to their reburial.</p>	<ul style="list-style-type: none"> <li>Retain agreement and all artifact disposition reports in project file, and submit to the EIC</li> </ul>	<p>(agreement with Soboba Band of Luiseño Indians if artifacts are found)</p> <ul style="list-style-type: none"> <li>During/after construction (retain documentation)</li> </ul>		
<p><b>CUL-6: Human Remains.</b> If human skeletal remains are uncovered during implementation of the Project, EMWD shall immediately halt work and contact the Riverside County coroner to determine whether the remains are human. If the County Coroner determines that the remains are Native American, they shall contact the NAHC, as required by law. The NAHC shall then identify the person(s) thought to be the Most Likely Descendant (MLD) of the deceased Native American, who will then help determine what course of action should be taken in dealing with the remains. EMWD shall ensure that the immediate vicinity where the Native American human remains are located is not damaged or disturbed by further development activity until the landowner has discussed and conferred with the MLD regarding their recommendations.</p>	<ul style="list-style-type: none"> <li>Include mitigation measure in construction contracting specification</li> <li>If human remains are found, coordinate with Riverside County Coroner, and contact the NAHC if applicable</li> <li>NAHC shall notify MLD, if applicable</li> <li>Document and retain records regarding discovery of skeletal remains in project file</li> </ul>	<ul style="list-style-type: none"> <li>During preparation of construction contractor specifications (mitigation measure in specifications)</li> <li>During construction (coordinate with coroner if human remains are found)</li> <li>Notify the MLD</li> <li>During/after construction (retain documentation)</li> </ul>	<ul style="list-style-type: none"> <li>EMWD Engineer</li> <li>EMWD Engineer or EMWD Planner and Construction Contractor</li> <li>NAHC</li> <li>EMWD Engineer</li> </ul>	

**Geology, Soils, and Seismicity**

<p><b>GEO-1: Soils Reports and Geotechnical Investigation.</b> A soils report and geotechnical investigation report shall be prepared by a California licensed geotechnical engineer for the Project facilities with potential to encounter shallow groundwater or expansive soils. These reports shall evaluate various geotechnical characteristics including existing liquefaction risk, expansive soils, and soil stability, and whether the operation of Project facilities would exacerbate an existing risk of liquefaction or soil instability or create a new risk. The reports and evaluation shall provide</p>	<ul style="list-style-type: none"> <li>Include mitigation measure in design specifications</li> <li>Retain a copy of Geotechnical Investigation report, recommendations, and design specifications in project file</li> </ul>	<ul style="list-style-type: none"> <li>During preparation of construction contractor specifications (mitigation measure in specifications)</li> <li>During/after construction</li> </ul>	<ul style="list-style-type: none"> <li>EMWD Engineer and Design Contractor</li> <li>EMWD Engineer</li> </ul>	
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Mitigation Measure	Monitoring / Reporting Action	Monitoring Timing	Responsible Person(s)	Verification of Compliance (Date/Responsible Person)
<p>recommendations for Project design per these findings and recommendations shall be incorporated into facility design.</p>		<p>(retain documentation)</p>		
<p><b>GEO-2: Paleontological Monitoring.</b> Prior to the start of earth moving activities, EMWD shall retain a Qualified Paleontologist defined as one meeting SVP standards (Society for Vertebrate Paleontology 2010) to attend any pre-grade construction meetings to determine when and where excavations will occur below a depth of 3 feet below the existing ground surface. Working with EMWD and the construction crew, the Qualified Paleontologist shall determine a paleontological monitoring schedule.</p> <p>The Qualified Paleontologist, or a paleontological monitor working under the direct supervision of the Qualified Paleontologist, shall monitor all ground-disturbing activity below a depth of 3 feet below the existing ground surface. The location, duration, and timing of monitoring shall be determined by the Qualified Paleontologist designated for the Project in consultation with the EMWD and shall be based on a review of geologic maps and grading plans. During the course of monitoring, if the Qualified Paleontologist can demonstrate based on observations of subsurface conditions that the level of monitoring should be reduced, increased, or discontinued, the paleontologist, in consultation with EMWD may adjust the level of monitoring, as warranted.</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contractor specification</li> <li>• Retain a Qualified Paleontologist to coordinate with EMWD and construction contractor to develop location and schedule for monitoring</li> <li>• Retain a Qualified Paleontologist to conduct monitoring during construction</li> <li>• Retain construction monitoring reports in the project file</li> </ul>	<ul style="list-style-type: none"> <li>• During preparation of construction contractor specifications (mitigation measure in specifications)</li> <li>• Prior to grubbing and trenching (retain paleontologist)</li> <li>• Prior to grubbing and trenching activities (monitoring)</li> <li>• During/after construction (retain documentation)</li> </ul>	<ul style="list-style-type: none"> <li>• EMWD Engineer</li> <li>• EMWD Planner or EMWD Engineer</li> <li>• EMWD Planner or EMWD Engineer</li> <li>• EMWD Engineer</li> </ul>	
<p><b>GEO-3: Paleontological Sensitivity Training.</b> Prior to start of earth moving activities, the Qualified Paleontologist shall conduct pre-construction worker paleontological resources sensitivity training. This training shall include information on what types of paleontological resources could be encountered during excavations, what to do in case an unanticipated discovery is made by a worker, and laws protecting paleontological resources. All construction personnel shall be informed of the possibility of encountering fossils and instructed to immediately inform the construction foreman or supervisor if any bones or other potential fossils are unexpectedly unearthed in an area where a paleontological monitor is not present.</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contractor specification</li> <li>• Retain a Qualified Paleontologist to conduct paleontological sensitivity training for all construction personnel</li> </ul>	<ul style="list-style-type: none"> <li>• During preparation of construction contractor specifications (mitigation measure in specifications)</li> <li>• Prior to grubbing and trenching (conduct sensitivity training)</li> </ul>	<ul style="list-style-type: none"> <li>• EMWD Engineer</li> <li>• EMWD Planner or EMWD Engineer and Construction Contractor</li> </ul>	
<p><b>GEO-4: Unanticipated Paleontological Discovery.</b> In the event of unanticipated discovery of paleontological resources when a paleontological monitor is not present, the contractor shall cease ground-disturbing activities within 50 feet of the find until it can be assessed by the Qualified Paleontologist. The Qualified Paleontologist shall assess the find, implement recovery and reporting measures, if necessary, and determine if paleontological monitoring is warranted once work resumes.</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contracting specification</li> <li>• Qualified Paleontologist to assess the find, implement recovery and reporting measures</li> </ul>	<ul style="list-style-type: none"> <li>• During preparation of construction contractor specifications (mitigation measure in specifications)</li> </ul>	<ul style="list-style-type: none"> <li>• EMWD Engineer</li> <li>• EMWD Planner or EMWD Engineer</li> <li>• EMWD Engineer</li> </ul>	

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	<ul style="list-style-type: none"> <li>Retain construction monitoring report in project file</li> </ul>	<ul style="list-style-type: none"> <li>Prior to grubbing and trenching (paleontologist to assess find)</li> <li>During/after construction (retain documentation)</li> </ul>		
<b>Hazards and Hazardous Materials</b>				
Implementation of <b>Mitigation Measure TRAF-1</b> is required (see below).	See below.			
<b>Noise</b>				
<p><b>NOISE-1: Noise Barriers.</b> EMWD shall require the construction contractor to provide temporary fences and noise barriers to block the line-of-sight between the construction equipment and the noise-sensitive receptor when the use of heavy equipment is prevalent for construction occurring in the City of San Jacinto outside of the allowable hours specified in the City of San Jacinto Municipal Code Section 8.40.090 and for construction occurring in the City of Hemet outside of the allowable hours specified in the City of Hemet Municipal Code Section 67-10. Building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.</p> <ul style="list-style-type: none"> <li>Provide a 15-foot-tall construction fence equipped with noise reduction materials such as noise blankets rated to achieve nighttime noise performance levels of 55 dBA Leq and 75 dBA Lmax or less at noise sensitive receptors with a line-of-sight to the construction site at the intersection of Esplanade Avenue and Sanderson Avenue during nighttime construction.</li> </ul>	<ul style="list-style-type: none"> <li>Include mitigation measure in construction contracting specification</li> <li>Implement mitigation measure during nighttime construction at the intersection of Esplanade Avenue and Sanderson Avenue</li> <li>Building plans shall include documentation prepared by a noise consultant verifying compliance</li> <li>Conduct periodic monitoring of mitigation commitments during construction</li> </ul>	<ul style="list-style-type: none"> <li>During preparation of construction contractor specifications (mitigation measure in specifications)</li> <li>During nighttime construction at the intersection of Esplanade Avenue and Sanderson Avenue</li> <li>During design (noise consultant verify compliance)</li> <li>During construction (monitoring)</li> </ul>	<ul style="list-style-type: none"> <li>EMWD Engineer</li> <li>EMWD Engineer and Construction Contractor</li> <li>EMWD Engineer and Design Contractor</li> <li>EMWD Planner</li> </ul>	
<p><b>NOISE-2: Noise Best Management Practices.</b> EMWD shall require the construction contractor to implement BMPs that ensure the following:</p>	<ul style="list-style-type: none"> <li>Include mitigation measure in construction contracting specification</li> <li>Implement BMPs</li> </ul>	<ul style="list-style-type: none"> <li>During preparation of construction contractor specifications (mitigation</li> </ul>	<ul style="list-style-type: none"> <li>EMWD Engineer</li> <li>Construction Contractor</li> <li>EMWD Planner</li> </ul>	

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<ul style="list-style-type: none"> <li>Place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest to the Project site.</li> <li>Locate equipment staging areas at the greatest possible distance between construction-related noise sources and noise-sensitive receptors nearest the Project site.</li> <li>Ensure appropriate maintenance and working order of equipment and vehicles, and that all construction equipment is equipped with manufacturers approved mufflers and baffles.</li> <li>Install sound-control devices in all construction equipment, no less effective than those provided on the original equipment.</li> </ul>	<ul style="list-style-type: none"> <li>Conduct periodic monitoring of mitigation commitments during construction</li> <li>Retain construction monitoring report in project file</li> </ul>	<ul style="list-style-type: none"> <li>measure in specifications)                             <ul style="list-style-type: none"> <li>During Construction (BMPs)</li> <li>During construction (monitoring)</li> <li>During/after construction (retain documentation)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>EMWD Engineer</li> </ul>	
<p><b>NOISE-3: Operation Noise Standards.</b> EMWD shall ensure that new aboveground facilities are designed such that operational noise complies with applicable noise standards at the property boundary.</p>	<ul style="list-style-type: none"> <li>Include mitigation measure in design specifications</li> <li>Conduct periodic monitoring of mitigation commitments</li> <li>Retain a copy of design specifications in project file</li> </ul>	<ul style="list-style-type: none"> <li>During preparation of construction contractor specifications (mitigation measure in specifications)</li> <li>At the start of operation (Monitoring)</li> <li>During/after construction (retain documentation)</li> </ul>	<ul style="list-style-type: none"> <li>EMWD Engineer and Design Contractor</li> <li>EMWD Planner</li> <li>EMWD Engineer</li> </ul>	
<b>Transportation</b>				
<p><b>TRAF-1: Traffic Control Plan.</b> Prior to the start of construction of the raw water conveyance facilities, EMWD shall require the construction contractor to prepare a Traffic Control Plan. The Traffic Control Plan will show all signage, striping, delineated detours, flagging operations and any other devices that will be used during construction to guide motorists, bicyclists, and pedestrians safely through the construction area and allow for adequate access and circulation to the satisfaction of the City of San Jacinto and the City of Hemet. The Traffic Control Plan shall be prepared in accordance with the City of San Jacinto and the City of Hemet’s traffic control guidelines and will be prepared to ensure that access will be maintained to individual properties, and that emergency access will not be restricted. Additionally, the Traffic Control Plan will ensure that congestion and traffic delay are not substantially increased as a result of the construction</p>	<ul style="list-style-type: none"> <li>Include mitigation measure in construction contracting specification</li> <li>Prepare Traffic Control Plan</li> <li>Provide written notice at least two weeks prior to the start of construction to owners/occupants along portions of Esplanade Avenue, Sanderson Avenue, and Commonwealth Avenue</li> </ul>	<ul style="list-style-type: none"> <li>During preparation of construction contractor specifications (mitigation measure in specifications)</li> <li>Prior to construction (Traffic Control Plan)</li> </ul>	<ul style="list-style-type: none"> <li>EMWD Engineer</li> <li>Construction Contractor</li> <li>EMWD Engineer and Construction Contractor</li> <li>EMWD Planner</li> <li>EMWD Engineer</li> </ul>	

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<p>activities. Further, the Traffic Control Plan will include detours or alternative routes for bicyclists using on-street bicycle lanes as well as for pedestrians using adjacent sidewalks. In addition, EMWD shall provide written notice at least two weeks prior to the start of construction to owners/occupants along portions of Esplanade Avenue, Sanderson Avenue, and Commonwealth Avenue to be affected during construction.</p> <p>During construction, EMWD shall verify that the construction contractor has maintained continuous vehicular and pedestrian access to any affected residential driveways from the public street to the private property line, except where necessary construction precludes such continuous access for reasonable periods of time. Access will be reestablished at the end of the workday. If a driveway needs to be closed or interfered with as described above, EMWD shall notify the owner or occupant of the closure of the driveway at least five working days prior to the closure. The Traffic Control Plan shall include provisions to ensure that the construction of the conveyance pipeline does not interfere unnecessarily with the work of other agencies such as mail delivery, school buses, and municipal waste services.</p>	<p>to be affected during construction</p> <ul style="list-style-type: none"> <li>• Conduct periodic monitoring of Traffic Control Plan requirements during construction, including notification to owners/occupants affected by road closures</li> <li>• Retain copy of Traffic Control Plan in project file</li> </ul>	<ul style="list-style-type: none"> <li>• Prior to construction (notification)</li> <li>• During construction (monitoring)</li> <li>• During/after construction (retain documentation)</li> </ul>		
<b>Wildfire</b>				
<p>Implementation of <b>Mitigation Measure TRAF-1</b> is required (see above).</p>	<p>See above.</p>			

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