CEQA Environmental Checklist And Determination
PALO VERDE OUTFALL DRAIN BACTERIAL INDICATORS TMDL

The California Regional Water Quality Control Board, Colorado River Basin Region (Regional Board) is the Lead Agency responsible for evaluating potential environmental impacts of the proposed amendment to the Water Quality Control Plan for the Colorado River Basin Region (Basin Plan) incorporating a Palo Verde Outfall Drain Bacterial Indicators Total Maximum Daily Load (TMDL) and Implementation Plan.

The Secretary for Resources certified the basin planning process as exempt from certain requirements under the California Environmental Quality Act (CEQA), including preparation of an environmental impact report [Title 14, California Code of Regulations, Section 15251(g)]. The TMDL and its supporting attachments are a proposed amendment to the Basin Plan, and, therefore, are part of the basin planning process. Thus, the proposed amendment is considered functionally equivalent to an environmental impact report. Included in the functionally equivalent amendment are the:

- Proposed Basin Plan Amendment Incorporating a Palo Verde Outfall Drain Bacterial Indicators TMDL
- Palo Verde Outfall Drain Bacterial Indicators TMDL staff report
- Draft Regional Board Resolution
- CEQA Checklist and Determination
- Natural Environment Study
- Economic Analysis of Palo Verde Outfall Drain Bacterial Indicators TMDL (Attachment 1)

Any regulatory program of the Regional Board certified as functionally equivalent, however, must satisfy the documentation requirements of Title 23, California Code of Regulations, Section 377(a), which requires an Environmental Checklist with a description of the proposed activity and a determination with respect to significant environmental impacts. This information is presented below.

1. Project Title
Amendment to the California Regional Water Quality Control Plan for the Colorado River Basin Region (Basin Plan) to establish Palo Verde Outfall Drain Bacterial Indicators Total Maximum Daily Load (TMDL) and Implementation Plan

2. Lead Agency Name and Address
California Regional Water Quality Control Board, Colorado River Basin Region
73-720 Fred Waring Drive, Suite 100
Palm Desert, CA 92260

3. Contact Person and Phone Number
Teresa Gonzales, Senior Environmental Scientist, (760) 776-8931

4. Project Location
Colorado River Basin Region (southeastern California), Palo Verde Valley, Imperial and Riverside Counties

5. Project Sponsor's Name and Address
See lead agency

6. General Plan Designation
Not applicable

7. Zoning
Not applicable

8. Project Description

The proposed project is an Amendment to the Water Quality Control Plan for the Colorado River Basin Region (Basin Plan) that will establish Palo Verde Outfall Drain Bacterial Indicators Total Maximum Daily Load (TMDL). Also as required by Section 13242 of the Porter-Cologne Water Quality Act the proposed amendment incorporates a TMDL Implementation Plan to address pathogen-caused impairments. The Implementation Plan requires that responsible parties implement Management Practices (MPs) according to a time schedule, and includes proposed compliance monitoring/enforcement activities.

A TMDL is the maximum amount of a pollutant that a waterbody can receive while it still meets water quality objectives (narrative or numerical) designed to protect beneficial uses of waterbodies. The Basin Plan states that designated beneficial uses of Palo Verde Lagoon and Outfall Drain include: Water contact recreation (REC I); non-contact water recreation (REC II); warm freshwater habitat (WARM); wildlife habitat (WILD); and preservation of rare, threatened, or endangered species (RARE) (California Regional Water Quality Control Board 2002). (REC I and REC II usage is unauthorized within Riverside County's portion of the flow.) Water quality objectives that apply to pathogen bacteria (*E. coli*, enterococci, fecal coliform) are being violated in Palo Verde Lagoon. Violation of these objectives indicates impairment of designated beneficial uses of Palo Verde Lagoon and Outfall Drain, and degraded water quality conditions.

The TMDL's purpose is to eliminate the impairments that pathogens are causing on the designated beneficial uses of Palo Verde Lagoon and Outfall Drain, in violation of water quality objectives. Excess pathogens can cause a threat to habitat and biological resources, including wildlife, vegetation, fish, and invertebrates that are supported by Palo Verde Lagoon and Outfall drain. They also pose a threat to public health.

The main source of excess pathogens originates from waterfowl (96.9%). Other sources include muskrat (2.3%), septic systems (0.4%), songbirds (0.4%) and beaver (0.02%). Further monitoring may lead to new information that could alter these results.

The proposed implementation plan will take place in two phases. Phase I consists of actions to be accomplished between 2004 and 2007. Phase I relies on controlling nonpoint sources of bacteria to Palo Verde Outfall Drain via voluntary management practices and regulatory compliance with Assembly Bill 885. Phase I also depends on any existing or future point source contributors being in compliance with their permits, Waste Discharge Requirements (WDRs), waivers and/or Memorandums of Understanding.

If water quality targets are not achieved upon conclusion of Phase I in 2007, Phase II begins and revision of the time schedule for implementation will take place. The dual phase approach allows for immediate control of major sources while allowing time for monitoring in order to provide an analytical basis for Phase II planning. Phase II requires further assessment of bacterial contributions from sources not addressed in Phase I and determines the development of implementation actions to control these sources. Phase II will be completed by 2014. In Phase II, plans for a wastewater treatment plant in the community of Palo Verde may be introduced as the best method for managing bacteria in Palo Verde Outfall Drain. If a WWTP is needed, additional CEQA analysis will be conducted for that project by the CEQA lead agency for the project.

THE PROPOSED BASIN PLAN AMENDMENT:

- Updates references to the State's Nonpoint Source Pollution Control Program.
- Includes Regional Nonpoint Source Control Program elements.
- Includes consideration of a (SSO) Site Specific Objective
- Deletes dated information that is no longer accurate.
- Establishes numeric targets for the constituents that are consistent with Basin Plan water quality objectives (Table 1).

Table 1 Water quality Objectives

Indicator Parameter	30-Day Geometric Mean	30-Day Log Mean[a]	Maximum
E. coli	126 MPN[b]/100 ml	--	400 MPN/100 ml
Enterococci	33 MPN/100 ml	--	100 MPN/100 ml
Fecal Coliform	--	200 MPN/100ml	c

a. Based on a minimum of no less than 5 samples equally spaced over a 30-day period.
b. Most probable number.
c. No more than 10% of total samples during any 30-day period shall exceed 400 MPN/100 ml.

Adds a section for this proposed TMDL that:

- Summarizes Palo Verde Outfall Drain Bacterial Indicators TMDL elements, including the Problem Statement, Numeric Target, Source Analysis, Margin of Safety, Seasonal Variations and Critical Conditions, Loading Capacity, and Load Allocations and Wasteload Allocations;
- Designates responsible parties and management actions;
- Lists recommended Management Practices (MPs), with estimated implementation costs;
- Describes recommended actions for cooperating agencies;
- Describes Regional Board water quality monitoring and implementation tracking activities to assess TMDL implementation;

9. Surrounding Land Uses and Setting
The Basin Plan is applicable to the Colorado River Basin Region of California, as set forth in the California Water Code, Division 7, Section 13200(i). The region is located in southeastern California. The amendment applies to agricultural and residential land that drains into Palo Verde Outfall drain.

10. Other Public Agencies Whose Approval Is Required (e.g., for permits, financing approval, participation agreement): None

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below involve at least one impact that may be potentially affected by the project, as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Geology and Soils
☐ Hazards and Hazardous Materials	☐ Hydrology and Water Quality	☐ Land Use and Planning
☐ Mineral Resources	☐ Noise	☐ Population and Housing

- ☐ Public Services
- ☐ Recreation
- ☐ Transportation and Traffic
- ☐ Utilities and Service Systems
- ☐ Mandatory Findings of Significance

ENVIRONMENTAL CHECKLIST SUMMARY

	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
1. AESTHETICS – Would the project:	☐	☐	☐	☑
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☑
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☑
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☐	☑
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☑
2. AGRICULTURE RESOURCES -- In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☑
b) Conflict with existing zoning for agricultural use, or Williamson Act contract?	☐	☐	☐	☑
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☑
3. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon the make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☑

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☐	☑
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)?	☐	☐	☐	☑
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☑
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☑
4. BIOLOGICAL RESOURCES -- Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☑
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☑
c) Have a substantial adverse effect on 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?	☐	☐	☐	☑
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☑
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☑
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☑

5. CULTURAL RESOURCES -- Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☐	☑
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	☑
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☑
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☑

6. GEOLOGY AND SOILS -- Would the project:

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.	☐	☐	☐	☑
ii) Strong seismic ground shaking?	☐	☐	☐	☑
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☑
iv) Landslides?	☐	☐	☐	☑
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☑
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?	☐	☐	☐	☑
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?	☐	☐	☐	☑
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?	☐	☐	☐	☑

7. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☑
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☑
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☑
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☑
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☑
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?	☐	☐	☐	☑
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☑
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?	☐	☐	☐	☑

8. HYDROLOGY AND WATER QUALITY -- Would the project:

a) Violate any water quality standards or waste discharge requirements?	☐	☐	☐	☑

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 the existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☑
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☐	☑
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☐	☑
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?	☐	☐	☐	☑
f) Otherwise substantially degrade water quality?	☐	☐	☐	☑
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?	☐	☐	☐	☑
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☑
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?	☐	☐	☐	☑
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☑
9. LAND USE AND PLANNING -- Would the project:				
a) Physically divide an established community?	☐	☐	☐	☑
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?	☐	☐	☐	☑
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☑

10. MINERAL RESOURCES -- Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☑
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☑

11. NOISE -- Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan ordinance, or applicable standards of other agencies?	☐	☐	☐	☑
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☑
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☑
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☑
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 expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☑
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☑

12. POPULATION AND HOUSING -- Would the project:

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)?	☐	☐	☐	☑
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☑
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☑

13. PUBLIC SERVICES -- Would the project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	☐	☐	☐	☑
Fire protection?	☐	☐	☐	☑
Police protection?	☐	☐	☐	☑
Schools?	☐	☐	☐	☑
Parks?	☐	☐	☐	☑
Other public facilities?	☐	☐	☐	☑

14. RECREATION -- Would the project:

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☑
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☑

15. TRANSPORTATION AND TRAFFIC -- Would the project:

a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	☐	☐	☐	☑
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☑
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?	☐	☐	☐	☑
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☑

e) Result in inadequate emergency access?	☐	☐	☐	☑
f) Result in inadequate parking capacity?	☐	☐	☐	☑
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	☐	☐	☐	☑

16. UTILITIES AND SERVICE SYSTEMS -- Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☑
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?	☐	☐	☐	☑
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☑
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☑
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☑
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	☑
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☑

17. MANDATORY FINDINGS OF SIGNIFICANCE -- Does the project:

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?	☐	☐	☐	☑

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.)	☐	☐	☐	☑
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☑

DETERMINATION

On the basis of this initial evaluation:

X_____ I find that the proposed project could not have a significant effect on the environment.

_____ I find that the proposed project could have a significant adverse effect on the environment. However, there are feasible alternatives and/or feasible mitigation measures that would substantially lessen any significant effects.

_____ I find that the proposed project may have a significant effect on the environment. There are no feasible alternatives and/or feasible mitigation measures that would substantially lessen any significant effects.

_____ _____

PHIL GRUENBERG **Date**
Executive Officer

ENVIRONMENTAL CHECKLIST DISCUSSION

This section contains the:

(a) environmental setting
(b) Management Practices (MPs) analysis
(c) discussion of each question in the Environmental Checklist Summary, explaining the reasons for selection of impact categories, and mitigation measures where appropriate

For the purpose of this CEQA Checklist and Determination, the "proposed project" includes the amendment, the reasonably foreseeable actions (i.e., MPs) to be implemented by responsible parties, and the TMDL compliance monitoring/enforcement activities.

This document fulfills requirements of California Code of Regulations Title 23, section 3777, subdivision (a)(1) through (3); Public Resources Code section 21159, subdivision (a)(1) through (3); and California Code of Regulations Title 14, section 15187, subdivisions (b) and (c)(1) through (3). More explicitly, this document provides an analysis of reasonably foreseeable environmental impacts resulting from project implementation. The evaluation also includes an analysis of reasonably foreseeable: (a) feasible mitigation measures, and (b) alternative means of compliance which would avoid or eliminate identified impacts.

ENVIRONMENTAL SETTING

Palo Verde Lagoon and Outfall Drain are located in Palo Verde Valley that lies in both Riverside and Imperial Counties of California. The area is 29 miles long and 15 miles across at its widest point (USDA 1974). Palo Verde Irrigation District irrigates 91,000 acres; 83,000 in Riverside County and 8,000 in Imperial County. The valley is bounded on the north by the Big Maria Mountains, on the west by Palo Verde Mesa, and on the south and east by the Colorado River. The valley has an irrigation system of canals, levees, drains, and a lagoon around which the community of Palo Verde is located.

Agriculture in the valley is sustained by irrigation water provided by Palo Verde Irrigation District (PVID). Water is diverted from the Colorado River at Palo Verde Diversion Dam. Large acreages of land in the valley are used to grow high-value row crops such as melons, cotton, alfalfa, and produce vegetables (USDA 1974). Drainage is provided by a 150 mile system of open drains that discharge into Palo Verde Outfall Drain. The outfall drain discharges into a prior channel of the Colorado River and enters the present river channel at the Cibola National Wildlife Refuge. The flow in the outfall drain ranges from approximately 350 cfs to approximately 800 cfs (PVID 1980).

MANAGEMENT PRACTICES (MPS) ANALYSIS

During TMDL development Regional Board staff (staff) created a list of potential MPs. Most pathogen-control MPs work by stopping pathogen sources from reaching the waterway. The listed MPs are not prescriptive because California law prohibits the

Regional Board from specifying design, location, type of construction, or particular manner in which compliance may be had (CWC § 13360). Hence, the Basin Plan amendment allows responsible parties to implement other non-listed MPs, so long as law does not prohibit the MPs.

The initial implementation of this TMDL will not cause economic impacts because the proposed Management Practices (MPs) are current regulations or will be required under future regulations. Depending on the initial success Phase 1 of the TMDL in achieving water quality goals, subsequent MPs could impact growers and residents of the area. Phase I has required and voluntary implementation actions that will be conducted and evaluated through the year 2007. If water quality goals are not achieved, Phase II will include another assessment of bacterial discharges and subsequent development of additional MPs.

A. PHASE I REQUIRED IMPLEMENTATION ACTIONS

Inspecting and maintaining septic systems is required under this TMDL. Upgrading and maintaining existing septic systems is also mandated under AB 885. Since this is also a condition of a septic system permit, the cost of requiring it cannot be attributed AB 885 or the TMDL being considered.

B. PHASE I VOLUNTARY IMPLEMENTATION ACTIONS

One practice was considered under this category, septic system maintenance public education.

1. Septic System Maintenance Public Education

Educating septic system owners on proper operation and maintenance is the responsibility of the county agency that issues septic system permits. Insuring that septic systems are being operating according to the permit is also the responsibility of the issuing agency. The cost of these actions is normally included in the cost of the permit. Therefore, these costs should not be attributed to this TMDL.

C. PHASE II PALO VERDE WASTEWATER TREATMENT FACILITY

Phase II will be implemented if Phase I water quality goals are not achieved by the year 2007. It is difficult to assess the economic impacts of Phase II because it is conditional on what the water quality is four years from now. What additional MPs or other measures will be implemented at that time will depend on the re-assessment of bacterial sources contributing to the problem. If needed, an economic analysis will be conducted at that time.

DISCUSSION OF EACH QUESTION IN THE ENVIRONMENTAL CHECKLIST SUMMARY

I. Aesthetics

Would the project:

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

No Impact. The proposed project will not have any substantial adverse effect on a scenic vista. MP implementation is expected to occur in residential areas where septic tanks are already present this will not have any adverse affects. Reduced pathogen levels in the Palo Verde Outfall drain will not affect this resource.

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

No Impact. The proposed project will not substantially damage scenic resources as the project is not located on or near any scenic resources.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

No Impact. The proposed project will not substantially degrade the existing visual character or quality of the site and its surroundings. MP implementation is expected to occur in residential areas where septic tanks are already present this will not have any adverse affects. Reduced pathogen levels in the Palo Verde Outfall drain will not affect this resource.

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

No Impact. The proposed project will not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

II. Agriculture Resources

Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The proposed project will not 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. MP implementation is expected to occur in residential areas.

b) Conflict with existing zoning for agricultural use, or Williamson Act contract?

No Impact. The proposed project does not conflict with existing zoning for agricultural use, or the California Land Conservation Act known as the Williamson Act.

c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

No Impact. The proposed project does not involve other changes in the existing environment that could result in conversion of Farmland to non-agricultural use.

III. Air Quality

Would the project:

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

No Impact. The proposed project does not conflict with or obstruct implementation of the applicable air quality plan.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

No Impact. The proposed project will not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

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)?

No Impact. The contribution attributable to the proposed project is not considered cumulatively considerable and, as a consequence, is no impact.

d) Expose sensitive receptors to substantial pollutant concentrations?

No Impact. The proposed project will not expose sensitive receptors to substantial pollutant concentrations.

e) Create objectionable odors affecting a substantial number of people?

No Impact. The proposed project will not create objectionable odors.

IV. Biological Resources

Would the project:

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

No Impact. The proposed project will not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. The proposed amendment will require the implementation of actions to reduce pathogens in Palo Verde lagoon and outfall drain this will not affect such resources.

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

No Impact. The proposed project will not have any substantial adverse effect on riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. The proposed amendment will require the implementation of actions to reduce pathogens in Palo Verde lagoon and outfall drain this will not affect such resources.

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?

No Impact. No impacts are expected to 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.

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?

No Impact. No impacts are expected to interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

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

No Impact. The proposed project does not conflict with any local policies or ordinances protecting biological resources.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The proposed project does not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

V. Cultural Resources

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

No Impact. The proposed project will not cause a substantial adverse change in the significance of a historical resource as defined in §15064.5. MP implementation is expected to occur in existing residential areas where any adverse affect such historical resources already would be identified and protected if they occur on-site.

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

No Impact. The proposed project will not cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5. MP implementation is expected to occur in existing residential areas this will not have any adverse affects.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No Impact. The proposed project will not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. MP implementation is expected to occur in existing residential areas this will not have any adverse affects.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No Impact. The proposed project will not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. MP implementation is expected to occur in existing residential areas this will not have any adverse affects.

d) Disturb any human remains, including those interred outside of formal cemeteries?

No Impact. The proposed project is not expected to disturb any human remains, including those interred outside of formal cemeteries. MP implementation is expected to occur in existing residential areas this will not have any adverse affects.

VI. Geology and Soils

Would the project:

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.
ii) Strong seismic ground shaking?
iii) Seismic-related ground failure, including liquefaction?
iv) Landslides?

No Impact. The proposed project will not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic activity

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

No Impact. The proposed project will not result in substantial soil erosion or the loss of topsoil.

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?

No Impact. The MPs that are likely to be implemented pursuant to this project are not structures that would affect or disturb soils to any significant degree such that the soils would become unstable, result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

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?

No Impact. MP implementation would not affect any soil to any significant degree such that they would create a risk to life or property.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact MP implementation is expected to take place on existing residential land where any soils incapable of adequately supporting the use of septic tanks would already be identified if they occur on-site.

VII. Hazards and Hazardous Materials

Would the project:

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

No Impact. The proposed project will not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The proposed project does not involve use of hazardous materials.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

No Impact. The proposed project will not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. The proposed project does not involve use of hazardous materials.

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

No Impact. The proposed project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The proposed project does not involve use of hazardous materials.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. The proposed project will not be located on sites that are included on a list of hazardous materials sites that would result in creation of a significant hazard to the public or the environment. MP implementation is expected to occur on existing residential areas which are not identified as hazardous materials sites.

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?

No Impact. The proposed project is not located within an airport land use plan or within two miles of a public airport or public use airport. MP implementation is expected to occur in residential areas.

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?

No Impact. The proposed project is not located within the vicinity of a private airstrip, MP implementation is expected to occur in existing residential areas.

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. The proposed project will not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

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?

No Impact. The proposed project will not 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.

VIII. Hydrology and Water Quality

Would the project:

a) Violate any water quality standards or waste discharge requirements?

No Impact. The proposed amendment will require the implementation of actions to reduce pathogens in Palo Verde lagoon and outfall drain this will improve water quality and in no way violate water quality standards or waste discharge requirements.

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 the existing land uses or planned uses for which permits have been granted)?

No Impact. This project does not involve the extraction or recharge of groundwater supplies. The surface waters involved with this project do not recharge any groundwater aquifers that are of significant value in terms of their beneficial uses.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

No Impact. MP implementation will not result in alteration of the course or drainage patterns of any surface water within Palo Verde Watershed.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

No Impact. This project will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

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?

No Impact. The proposed project will not result in the contribution of any additional runoff or create any new sources of polluted runoff.

f) Otherwise substantially degrade water quality?

No Impact. The proposed project will not otherwise substantially degrade water quality.

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?

No Impact. The proposed project will not place housing within a 100-year flood hazard area.

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. The proposed project will not place structures which would impede or redirect flood flows anywhere within a 100-year flood hazard area.

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?

No Impact. The proposed project will not 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.

j) Inundation by seiche, tsunami, or mudflow?

No Impact. The proposed project will not expose people or structures to a significant risk of inundation by seiche, tsunami, or mudflow.

IX. Land Use and Planning

Would the project:

a) Physically divide an established community?

No Impact. The proposed project will not physically divide an established community.

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?

No Impact. The proposed project will not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. The proposed project will not conflict with any applicable habitat conservation plan or natural community conservation plan

X. Mineral Resources

Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The proposed project will not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. The proposed project will not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan

XI. Noise

Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan ordinance, or applicable standards of other agencies?

No Impact. The proposed project will not result in exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan ordinance, or applicable standards of other agencies.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

No Impact. The proposed project will not result in exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

No Impact. The proposed project will not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

No Impact. The proposed project will not result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

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

No Impact. The proposed project is not located within an airport land use plan or within two miles of a public airport or public use airport.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The proposed project is not located within the vicinity of a private airstrip.

XII. Population and Housing

Would the project:

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)?

No Impact. The proposed project will not induce substantial population growth in an area, either directly or indirectly.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. The proposed project will not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere. MP implementation will not necessitate removal of housing.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. The proposed project will not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. MP implementation will not necessitate displacement of people.

XIII. Public Services

Would the project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Fire protection? Police protection? Schools? Parks? Other public facilities?

No Impact. The proposed project will not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives for public services.

XIV. Recreation

Would the project:

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. The proposed project will not increase the use of existing neighborhood and regional parks or other recreational facilities. MP implementation will not increase park or recreational facility use.

b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The proposed project will not include recreational facilities or require the construction or expansion of recreational facilities. MP implementation will not include or require recreational facility use.

XV. Transportation and Traffic

Would the project:

a) Cause an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?

No Impact. The proposed project will not cause an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections).

b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?

No Impact. The proposed project will not exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways.

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?

No Impact. The proposed project will not result in a change in air traffic patterns. MP implementation does not involve or affect air traffic.

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

No Impact. The proposed project will not substantially increase hazards due to design features or incompatible uses.

e) Result in inadequate emergency access?

No Impact. The proposed project will not result in inadequate emergency access.

f) Result in inadequate parking capacity?

No Impact. The proposed project will not result in inadequate parking capacity.

g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

No Impact. The proposed project does not conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks). MP implementation does not involve or affect alternative transportation.

XVI. Utilities and Service Systems

Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

No Impact. The proposed project will not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board. Rather, this project is expected to improve or prevent water quality degradation by reducing high pathogen loads that are in violation of water quality objectives established to protect Palo Verde out fall drain beneficial uses.

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?

No Impact. The proposed project could result in the construction of wastewater treatment facilities in Phase II of the implementation plan. Construction would be subject to CEQA and any other applicable permits or requirements and would not cause significant environmental effects?

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?

No Impact. The proposed project will not require or result in the construction of new storm water drainage facilities or expansion of existing facilities.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

No Impact. The proposed project has sufficient water supplies available to serve the project from existing entitlements and resources. The proposed project will not need new or expanded entitlements, either during or after MP construction/installation.

e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

No Impact. The proposed project will result in a determination by the wastewater treatment provider which serves the project area that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

No Impact. The proposed project does not involve, and will not affect, landfills. MP implementation does not involve, and will not generate, additional garbage to be accommodated by a landfill.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

No Impact. The proposed project complies with federal, state, and local statutes and regulations related to solid waste. The project is expected to improve or prevent water quality degradation by reducing high pathogen loads that are in violation of water quality objectives established to protect Palo Verde Outfall beneficial uses. MP implementation does not involve, and will not generate, additional solid waste.

XVII. Mandatory Findings of Significance

Does the project:

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?

No Impact. The proposed project does not 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.

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)?

No Impact. The proposed project will not have impacts that are individually limited, but cumulatively considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects

c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

No Impact. The proposed project does not have environmental effects which will cause substantial adverse effects on human beings either directly or indirectly. Rather, the proposed project is expected to reduce pathogen problems that may adversely affect human beings.

ALTERNATIVES & CUMULATIVE IMPACT ANALYSIS

The proposed amendment will require the implementation of actions to reduce pathogens in Palo Verde Lagoon and Outfall Drain. This will have no potentially significant cumulative impact upon Palo Verde Outfall Drain's biological resources.

ALTERNATIVES DISCUSSION

The proposed Bacterial Indicators TMDL for Palo Verde Outfall Drain (i.e., Preferred Alternative) has been the basis for all discussions in environmental documents, including this CEQA Checklist. Other alternatives exist including a No Action Alternative, a Shorter Compliance Timeframe Alternative (Alternative 2), and an Increased Regulatory Oversight Alternative (Alternative 3). Each alternative is described briefly below, with an assessment of impacts upon biological resources**.**

No Action Alternative
The No Action Alternative is defined as no Regional Board adoption of a TMDL and corresponding Implementation Plan. This means that pathogen levels will continue to: (a) violate Basin Plan water quality objectives, (b) impair beneficial uses, and (c) place the health of human communities at unacceptable risk. This alternative does not comply with the Clean Water Act or meet the purpose of the proposed action, which is to alleviate water quality problems. It is precisely because of these problems that law dictates a regulatory action. However, current pathogen levels are not a health risk to wildlife populations, based on: (a) wildlife being the major source of pathogens, and (b) a lack of wildlife disease outbreaks. Accordingly, this alternative would result in no impact upon environmental resources. However, the No Action alternative is not acceptable because of human health risks.

Preferred Alternative
The Preferred Alternative is defined as a Basin Plan amendment that will require responsible parties to utilize pathogen-control Management Practices (MPs) so that the project area will come into compliance with existing Basin Plan water quality objectives. This alternative requires full compliance within ten years. The Preferred Alternative is a feasible approach to decrease existing pathogen levels, and thus to decrease health risks for human communities. The timeframe is moderately aggressive yet reasonable, allowing sufficient time for responsible parties to evaluate MPs, and potentially apply for and be awarded grant money for MP implementation. This alternative would result in no impact upon environmental resources, for the same reasons as stated in the No Action Alternative.

Shorter Compliance Timeframe Alternative (Alternative 2)
The Shorter Compliance Timeframe Alternative (Alternative 2) is defined as the proposed project requiring compliance within five years, instead of ten years in the Preferred Alternative. This alternative would result in no impact upon biological resources (as in the Preferred Alternative), but the economic impacts would be much greater as it could force MP implementation to proceed without responsible parties having sufficient time to apply for and be awarded grant money.

Increased Regulatory Oversight Alternative (Alternative 3)
The Increased Regulatory Oversight Alternative (Alternative 3) is defined as the proposed project with an Implementation Plan of greater regulatory oversight. Such oversight could include requiring Riverside and Imperial Counties to: (a) collect data on septic system maintenance and failure rates, and (b) report such data to the Regional Board. This alternative would result in no impact upon environmental resources (as in the Preferred Alternative), but could be unnecessarily burdensome on the regulated community, and exhaustive of limited Regional Board staff resources.

Summary of Alternatives

Table 8 summarizes the alternatives.

Table 8: Alternatives Summary

Alternative	Agricultural Impacts	Biological Impacts	Water Quality Impacts	Objectives Met?
No Action	None	None	Adverse	No
Preferred Alternative	Less Than Significant	None	None	Yes
Alternative 2 (Faster time frame)	Less Than Significant	None	None	Yes - same time frame
Alternative 3 (Faster time frame)	Less Than Significant	None	None	Yes - faster time frame

REFERENCES

California Air Resources Board. 2002. Website. Links for 2000 Area Designations Maps / State and National. Available online at http://www.arb.ca.gov/desig/adm/adm.htm

California Regional Water Quality Control Board. 2002. Water Quality Control Plan, Colorado River Basin – Region 7. Colorado River Basin Regional Water Quality Control Board. Palm Desert, CA.