

TIJUANA RIVER
TOTAL MAXIMUM DAILY LOADS (TMDLS) FOR
INDICATOR BACTERIA AND TRASH

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)
ENVIRONMENTAL CHECKLIST

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A. PROJECT TITLE

Tijuana River Total Maximum Daily Loads (TMDLs) for Indicator Bacteria and Trash

B. LEAD AGENCY NAME AND ADDRESS

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(San Diego Water Board)
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C. LEAD AGENCY CONTACT PERSON

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D. PROJECT LOCATION

The Tijuana River watershed is the southernmost watershed in the San Diego Region. Located on the U.S. and Mexican border and approximately 1,750 square miles (4,465 km²) in area.¹ Divided by the U.S.-Mexico international border, approximately one-third of its area is in the U.S. and two-thirds is in Mexico. More than 80 percent of the watershed is undeveloped although there is a large population in the watershed in Mexico. The City of Imperial Beach and a portion of the City of San Diego are located on the U.S. side of the border while the watershed's larger urban centers, the cities of Tijuana and Tecate, are located in Mexico.

The Tijuana River is an ephemeral stream formed by the confluence of Cottonwood Creek (Río El Alamar) and Palm Creek (Río de las Palmas), about 4.5 miles southeast of the City of Tijuana. The river flows in a 6.6-mile concrete flood control channel through Tijuana to the border. On the U.S. side, the concrete channel continues for approximately 1,223 feet into a grouted energy dissipator for approximately 3,700 feet that then becomes an unlined channel². As the river and several tributaries cross from Tijuana into the U.S., these transboundary flows act as conduits for pollution generated in Mexico. As such, the pollution is transported through the river valley and estuary, and into the Pacific Ocean.

¹ *Tijuana River Watershed Technical Support Document for Solids, Turbidity and Trash TMDLs*, January 2010, Tetra Tech.

² *Final Programmatic Environmental Impact Statement Improvements to the Tijuana River Flood Control Project*, May 14, 2008, Parsons.

E. PROJECT DESCRIPTION

The San Diego Water Board is developing TMDLs for indicator bacteria and trash from the transboundary flows along the lower Tijuana River. The purpose of the TMDLs is to attain water quality objectives that support beneficial uses in the lower Tijuana River watershed.

The San Diego Water Board has identified human health and ecosystem impacts in the Tijuana River Valley as regional priorities for many years. The 2014/2016 Clean Water Act (CWA) Section 303(d) List of Water Quality Limited Segments (303(d) List) includes indicator bacteria and trash as pollutants in the lower Tijuana River watershed. These factors have contributed to the decision to develop TMDLs for indicator bacteria and trash from transboundary flows into the lower Tijuana River watershed. Controlling the sources of indicator bacteria and trash that cross the border will likely result in significant improvements to water quality.

The U.S. and Mexico sections of the International Boundary and Water Commission (IBWC) are tasked with resolving transboundary flow issues. The U.S. section of the IBWC (USIBWC) is responsible for maintaining the Tijuana River Flood Control Project (Tijuana FCP). The Tijuana FCP is a levee system approximately 2.3 miles long that includes a concrete lined channel that contains the Tijuana River from the international border where it crosses from Mexico into the U.S. to the beginning of the natural Tijuana River channel near Dairy Mart Road. The USIBWC is also responsible for operating the South Bay International Wastewater Treatment Plant (SBIWTP). The SBIWTP treats wastes from Tijuana's sewage collection system and transboundary dry-weather flows intercepted from cross-border tributaries in the Tijuana River Valley. These tributaries are sources of sewage and trash that impact the Tijuana River Valley. Development of the Tijuana River Diversion Study by the USIBWC is currently under way. The study is evaluating the nature of the transboundary flows and providing recommendations for technical alternatives that USIBWC can implement to reduce pollution from these flows.

The San Diego Water Board's proposed project is an amendment to the *Water Quality Control Plan for the San Diego Region* (Basin Plan) that will establish TMDLs and an implementation plan to address transboundary flows that contribute indicator bacteria and trash into the Tijuana River along the international boundary west of the San Ysidro Port of Entry in San Diego County, California.

F. PROBLEM STATEMENT

The San Diego Water Board has identified several "water quality limited segments" in and adjacent to the Tijuana River watershed. These are surface waters on the U.S. side of the border that do not support all of their designated beneficial uses due to pollutants that cause impairments. Although the overall water quality in the upper Tijuana River watershed (U.S. side) is considered good, the lower watershed is severely impaired. The 303 (d) List includes the Tijuana River as well as the downstream Tijuana River Estuary and Pacific Ocean shoreline as impaired waterbodies.

In the lower watershed, the river crosses from Mexico into the U.S., acting as a conduit for transboundary pollution generated in Mexico. As such, the pollution is transported through the river valley and estuary, and into coastal waters in the San Diego Region. The Tijuana River is on the 303(d) List for the following pollutants.

2014/2016 CWA Section 303(d) Listing	
1.	Ammonia as Nitrogen
2.	Benthic Community Effects
3.	Cadmium
4.	Chlorpyrifos
5.	Diazinon
6.	Eutrophic Conditions
7.	Indicator Bacteria
8.	Low Dissolved Oxygen (DO)
9.	Malathion
10.	Pesticides
11.	Phosphorus
12.	Sedimentation/Siltation
13.	Selenium
14.	Solids
15.	Surfactants (Methylene Blue Active Substances [MBAS])
16.	Synthetic Organics
17.	Total Nitrogen as N
18.	Toxicity
19.	Trace Elements
20.	Trash

The Tijuana River Estuary is on the 303(d) List for indicator bacteria, lead, low dissolved oxygen, eutrophic conditions, nickel, pesticides, thallium, toxicity, trash, and turbidity. In addition, adjacent Pacific Ocean shoreline segments starting from the U.S. border up through the community of Imperial Beach are included on the 303(d) List for indicator bacteria. Pollution from the Tijuana River at times negatively impacts water quality at beaches as far north as Coronado.

The San Diego Water Board has identified human health and ecosystem impacts in the Tijuana River Valley as regional priorities for many years in various resolutions and in annual operational plans driven by the Practical Vision.³ This has led to the decision to develop TMDLs for indicator bacteria and trash. Although the Tijuana River is on the 303(d) List for impairments due to a total of 20 pollutants, control of the sources of indicator bacteria and trash is likely to result in a significant degree of control of the remaining pollutants. Pollutants that are conveyed by dry weather and wet weather transboundary flows are intermingled. Reduction of indicator bacteria requires reduction of sewage and polluted urban runoff entering the Tijuana River Valley. Therefore, the loads and concentrations of other pollutants inherent in sewage and polluted urban runoff would also be reduced.

Indicator Bacteria

Indicator bacteria are not a threat to human health, but they are used to indicate the presence of fecal contamination, which contains bacteria and viruses that are a threat to human health (pathogens). Indicator bacteria in the river, estuary, and coastal waters are of particular concern due to their geographical extent in and around the valley and the indication of high risk to public health from fecal contamination in and around the water. The first year the Tijuana River was added to the 303(d) List for impairments due to indicator bacteria was 1992. This was due to the presence of *Escherichia coli* (*E. coli*) and total coliform. Statewide freshwater bacteria objectives for the protection of REC-1 are established using *E. coli* as they indicate the likelihood of pathogens of fecal origin in surface waters. *E. coli* are part of the intestinal biota of warm-blooded animals. Their presence in surface waters is an indicator of potential pollution. The steady state *E. coli* objective for freshwater is set at 126 colonies per 100 milliliters, which represents an allowable rate of illness deemed acceptable for the protection of public health (32 gastrointestinal illness per 1,000 recreators). Very high and frequent *E. coli* objective exceedances indicate an unacceptable risk of exposure to illness-causing pathogens, which can constrain use of the river for the following recreational activities:

1. REC-1 activities involving body contact with water, where ingestion of water is reasonably possible (e.g., swimming and wading); and
2. REC-2 activities involving proximity to water, which does not normally involve body contact with water, but where ingestion of water is still reasonably possible (e.g., hiking and camping).

³ Through the [Practical Vision](#) and associated annual operational plans, the San Diego Water Board develops environmental outcome measures, sets goals, prioritizes the work of staff, guides decision making, and tracks progress.

The principal source of impairments due to pathogens, represented by indicator bacteria exceedances, is the inadequate sewage collection and treatment on the Mexican side of the watershed. Although the pathogens specifically present a risk to human health, the sewage they are part of contains a wide variety of additional pollutants that negatively impact the river's ecosystem beneficial uses as well. These beneficial uses are: Preservation of Biological Habitats of Special Significance (BIOL), Warm Freshwater Habitat (WARM), Wildlife Habitat (WILD) and Rare, Threatened, or Endangered Species (RARE). Sewage contains high nutrient loads that have prompted eutrophic conditions and low dissolved oxygen concentrations in the Tijuana River Valley, which are detrimental to most aquatic life. Sewage also contains surfactants, widely used in detergents and other cleaning products. Surfactants have toxic effects on aquatic plants and animals.

The Tijuana River Estuary and Pacific Ocean shoreline adjacent to the river mouth are also listed for indicator bacteria due to the presence of enterococcus, fecal coliform, and/or total coliform. These exceedances indicate impairments to recreational beneficial uses and human consumption of filter-feeding shellfish such as clams, oysters, and mussels (SHELL) beneficial use.

Trash

The first year the Tijuana River was added to the 303(d) List for impairments due to trash was 1998. The water quality objective for trash requires that it must not be present in the Tijuana River or adjacent areas in amounts that adversely affect beneficial uses or cause nuisance. Trash, including tires, is a significant pollutant in the Tijuana River, compromising use of the river for recreational activities involving proximity to water, which does not normally involve body contact with water, but where ingestion of water is still reasonably possible (e.g., hiking and camping).

Trash also presents pathogen threats as it promotes vectors. For example, some mosquitos thrive in waste tires, exposing the public to higher risks from mosquito-carrying viruses such as West Nile, yellow fever, chikungunya, and Zika. *Aedes aegypti* mosquitoes carry the yellow fever, chikungunya, and Zika viruses. They, in particular, thrive in waste tires.

Trash is a threat to the river's aforementioned ecosystem beneficial uses as well. Mammals, turtles, birds, fish, and crustaceans are at risk of ingestion and entanglement of trash, which can be fatal for freshwater, estuarine, and marine life. The alteration of habitats due to trash can render them unsuitable. Negative impacts from trash on aquatic life beneficial uses are discussed in Appendix A of the State Water Resources Control Board's 2015 Amendment to the Water Quality Control Plan for Ocean Waters of California. In addition to the river, the Tijuana River Estuary is also listed for trash. The principal source of impairments due to trash is the inadequate collection and disposal of trash on the Mexican side of the watershed.

G. ENVIRONMENTAL IMPACTS – CEQA CHECKLIST

1. AESTHETICS	Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Except as provided in Public Resources Code section 21099, would the project:

a.	Have a substantial adverse effect on a scenic vista? Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
b.	In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				X
c.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				X

2. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

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?				X
b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X
d.	Result in the loss of forest land or conversion of forest land to non-forest use?				X
f.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

a.	Conflict with or obstruct implementation of the applicable air quality plan?				X
b.	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?				X
c.	Expose sensitive receptors to substantial pollutant concentrations?				X
d.	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				X

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, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
c.	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
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?				X
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
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?				X

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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5. CULTURAL RESOURCES

Would the project:

a.	Cause a substantial adverse change in the significance of a historical resource pursuant to section 15064.5?				X
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to section 15064.5?				X
c.	Disturb any human remains, including those interred outside of dedicated cemeteries?				X

6. ENERGY

Would the project:

a.	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?				X
b.	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				X

7. GEOLOGY AND SOILS

Would the project:

a.	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				X
	i. Rupture of 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.				X
	ii. Strong seismic ground shaking?				X
	iii. Seismic-related ground failure, including liquefaction?				X
	iv. Landslides?				X
b.	Result in substantial soil erosion or the loss of topsoil?				X
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?				X
d.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				X
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X

	Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X

8. GREENHOUSE GAS EMISSIONS

Would the project:

a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				X

9. 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?				X
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?				X
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
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?				X
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
f.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g.	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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10. HYDROLOGY AND WATER QUALITY

Would the project:

a.	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?				X
b.	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				X
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
	i. result in a substantial erosion or siltation on- or off-site;				X
	ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;				X
	iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				X
	iv. impede or redirect flood flows?				X
d.	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
e.	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X

11. LAND USE AND PLANNING

Would the project:

a.	Physically divide an established community?				X
b.	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				X

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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12. MINERAL RESOURCES

Would the project:

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

13. NOISE

Would the project:

a.	Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				X
b.	Generate excessive groundborne vibration or groundborne noise levels?				X
c.	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X

14. POPULATION AND HOUSING

Would the project:

a.	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b.	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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15. PUBLIC SERVICES

Would the project:

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

16. 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?				X
b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X

17. TRANSPORTATION

Would the project:

a.	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?				X
b.	Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)				X
c.	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
d.	Result in inadequate emergency access?				X

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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18. TRIBAL CULTURAL RESOURCES

Would the project:

a.	Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
	i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or				X
	ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				X

19. UTILITIES AND SERVICE SYSTEMS

Would the project:

a.	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects			X	
b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X
c.	Result in a determination by the waste water 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?				X
d.	Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				X
e.	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				X

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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20. WILDFIRE

If located in or near state responsibility areas or lands classified as very high hazard severity zones, would the project:

a.	Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
b.	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				X
c.	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				X
d.	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				X

21. MANDATORY FINDINGS OF SIGNIFICANCE

a.	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				X
b.	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)				X
c.	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				X

H. ENVIRONMENTAL CHECKLIST DISCUSSION

For the purpose of this CEQA Checklist, the “proposed project” includes the amendment and reasonably foreseeable implementation actions by the USIBWC.

8. GREENHOUSE GAS EMISSIONS

Would the project:

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

Less Than Significant Impact. The project may include USIBWC installing a new lift station and related fixtures as part of the existing treatment system. Construction of a new lift station may involve temporary use of heavy equipment; however, the overall impact is likely to be less than significant. Adding a new lift station to an existing facility is likely to cause a less than significant impact.

19. UTILITIES AND SERVICE SYSTEMS

Would the project:

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

Less Than Significant Impact. The project may include USIBWC installing a new lift station as part of the larger existing treatment system which would expand the facility; however, the overall impact of one additional lift station to an existing facility is likely to cause a less than significant impact.