

7.0 Effects Found Not to be Significant

The environmental review process under both CEQA and NEPA requires a brief description of the environmental issues that were determined during preliminary project review not to be significant and were therefore not discussed in detail in this draft EIR/EIS. These issues may be identified in the Initial Study or during the Scoping Process. As described in Section 1.5 (Scoping Process of this EIR/EIS), CEQA and NEPA regulations require an early and open process for determining the scope of issues related to a proposed action. To identify the key issues and concerns relevant to the scope of this draft EIR/EIS, the Wildlife Agencies and Water Authority published an NOP and NOI soliciting comments from other public agencies, organizations, and members of the public. In addition to these required notices, a public scoping meeting was held. The result of this scoping process, as well as an initial evaluation of the potential effects of the proposed action by the Wildlife Agencies and Water Authority, was the identification of potentially significant issues requiring further analysis. These issues are addressed in detail throughout this EIR/EIS, with impact assessments provided in Section 4.0.

For the alternatives analyzed in this draft EIR/EIS, the following environmental effects were determined not to be potentially significant, and therefore did not require detailed analysis: aesthetics, air quality/climate change, agricultural resources, cultural resources, geology and soils, hazardous materials, housing/population, mineral and energy sources, noise, recreation, and transportation/circulation. These issues are addressed individually below, in the context of the potential effects of the alternatives.

Covered Activities under the proposed Plan or alternatives, including most CIP projects, and some O&M and Preserve Area management, may be required to undergo subsequent environmental review and approvals under CEQA, at which time a decision will be made whether there is a requirement to include a detailed analysis of any of these issues.

7.1 Aesthetics

For any of the proposed alternatives, aesthetic resources would not be directly affected and the issue was determined to not warrant further analysis. None of the alternatives would significantly degrade the existing visual character or quality of the Plan Area or have any direct effects on scenic resources including designated scenic highways or vistas. The requirements that Alternatives 2, 3, and 4 assure permanent conservation and management of the Preserve Area that complement regional open space areas will avoid and minimize impacts to aesthetic resources. Thus, aesthetics were not considered to be an issue that warranted further detailed analysis in this draft EIR/EIS.

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Construction of and permanent location of some facilities associated with implementing the proposed Plan and alternatives may have the potential to result in visual impacts. These potential visual impacts by Covered Activities would be determined and mitigation provided through subsequent environmental review and approvals, when required.

7.2 Air Quality/Climate Change

The Plan Area is located within the San Diego Air Basin (SDAB). The U.S. EPA and the state of California have developed Ambient Air Quality Standards (AAQS) for pollutants of primary concern. These pollutants are ozone (O₃), carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), lead (Pb), suspended particulates that are 10 microns or less in diameter (PM₁₀), and suspended particulates that or 2.5 microns or less in diameter (PM_{2.5}). The AAQS represent the maximum levels of background pollution considered safe, with an adequate margin of safety, to protect the public health and welfare. The SDAB is in compliance with the Federal and State AAQS for all regulated air pollutants, with the exception of ozone (Federal and State) and total suspended particulates (PM₁₀, State only) (State of California 2006b). In general, air quality has improved in the SDAB, and pollutant levels continue to show a downward trend (County of San Diego 2007).

The most recent draft CEQ guidance (75 Fed. Reg. 8046 [Feb. 23, 2010]) advises agencies to conduct an emissions-related NEPA analysis where that analysis will provide meaningful information to decision-makers and the public. CEQ proposes a reference point of 25,000 metric tons of GHG emissions per year as a useful indicator that a project may meet the foregoing “meaningful” standard. But the draft guidance also clarifies that the 25,000 metric tons reference point is neither an absolute standard nor an indicator of a level of emissions that may “significantly” affect the quality of the human environment. Examples of actions that may warrant a discussion of emissions impacts include approval of a large solid waste landfill, approval of energy facilities such as a coal-fired power plant, and authorization of a methane-venting coal mine. The draft guidance cautions agencies about engaging in speculative analyses or attempting to link a particular project to specific climatological changes. The draft guidance discourages agencies from relying on the 25,000 metric tons reference point for use as a measure of indirect effects (for example, the growth-inducing impacts of a project), noting that such an analysis must be bounded by limits of feasibility in evaluating the upstream and downstream effects of federal agency actions. The guidance adheres to NEPA’s “rule of reason,” which ensures that agencies determine whether and to what extent to prepare their NEPA analysis based on the usefulness of new information to decision-makers and the public.

None of the proposed alternatives would obstruct implementation of any air quality plans or directly violate any air quality standards or generate pollutants or odors. These

actions would also not contribute substantial emissions of greenhouse gases, nor directly and adversely affect global climate change. Thus, air quality and climate change were not considered to be issues that warranted further detailed analysis in this draft EIR/EIS.

Implementation of Water Authority activities under each of the alternatives – constructing CIP projects and performing O&M and Preserve Area management – would involve the use of vehicles and equipment or activities, such as vegetation management (prescribed fire), that produce emissions that have the potential to directly affect air quality. Once constructed, most facilities (pipelines, flow regulator structures, vents, etc.) produce little or no point source pollutants. Air quality impacts could result from Water Authority vehicles as routine O&M Activities are conducted, and from construction vehicle emissions. Air quality impacts resulting from Water Authority activities would thus be attributed primarily to mobile emissions rather than point source emissions. Although it is not possible to provide quantitative information about future Covered Activities' specific emissions, the primary potential source of long-term greenhouse gas emissions would be related to the covered O&M Activities within the permit area, principally maintenance vehicles. To help place the magnitude of potential O&M emissions in perspective, 25,000 metric tons would equate to approximately 12.3 million diesel truck miles per year (10.15 kilograms CO₂/gallon diesel fuel / 0.2 gallon/mile for diesel trucks / 25,000 metric tons/year reference x 1,000 kilograms/ton = 12,315,271 miles/year). The actual historic vehicle miles per year associated with proposed Covered O&M Activities (approximately one million miles per year for all Water Authority vehicles) is less than 10 percent of the reference point, or about 2,000 metric tons per year. These sources of potential air pollution would occur under all of the proposed alternatives, even the No Action/No Permit Alternative. Potential air quality/climate change impacts by Covered Activities would be determined and mitigation provided through subsequent environmental review and approvals, when required.

7.3 Agricultural Resources

None of the proposed alternatives would directly affect agricultural resources, particularly since the majority of the actions identified in the Plan are within existing easements, rights-of-way, and the Preserve Area. Thus, effects on cultural resources were not considered to warrant further analysis in this draft EIR/EIS.

In some locations, implementation of Water Authority activities – constructing CIP projects, O&M, and, possibly, Preserve Area management – could potentially directly affect agricultural resources through ground disturbance or subsurface grading activities. Water Authority activities implemented under any of the alternatives, particularly construction projects, are anticipated to have to conduct an environmental analysis in compliance with CEQA, including assessing potential impacts on agricultural resources.

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Potential agricultural resource impacts by Covered Activities would be determined and mitigation provided through subsequent environmental review and approvals, when required.

7.4 Cultural Resources

None of the proposed alternatives would directly affect cultural resources or obstruct or interfere with any existing plans that manage regional cultural resources. None of the alternatives specifically address cultural resource issues, but cultural resources that exist or are found within the Plan's Preserve Area would benefit from the protection given to these areas. Thus, effects on cultural resources were not considered to warrant further analysis in this draft EIR/EIS.

In some locations, implementation of Water Authority activities – constructing CIP projects, O&M, and, possibly, Preserve Area management – could potentially directly affect cultural resources through ground disturbance or subsurface grading activities. Water Authority activities, particularly construction projects, are anticipated to have to conduct an environmental analysis in compliance with CEQA, including assessing potential impacts on cultural resources. Potential cultural resources impacts by Covered Activities would be determined and mitigation provided through subsequent environmental review and approvals (including consultation under section 106 of the National Historic Preservation Act), when required.

7.5 Geology and Soils

None of the proposed alternatives would directly impact geology and soils or expose people to adverse effects related to geology and seismic activities. Thus, geology and soils were not considered to be issues that warranted further detailed analysis in this draft EIR/EIS.

Implementation of Water Authority activities in accordance with any of the alternatives may potentially affect geology and soils resources through grading or other ground and soil disturbance activities. Potential geology and soils impacts by Covered Activities would be determined and mitigation provided through subsequent environmental review and approvals, when required.

7.6 Hazards/Hazardous Materials

None of the proposed alternatives would directly involve the transport, storage, handling, or emission of any hazardous materials. However, implementation of Water Authority activities conducted under any of the alternatives, such as O&M Activities, could directly

involve the transport, use, or storage and disposal of chemicals related to water treatment and petroleum products. An accidental spill of these materials would require immediate clean-up and remediation as mandated by state and federal regulations, and the proposed Plan addresses hazardous materials spills and toxic materials. The use and storage of hazardous materials is also regulated by state agencies, as well as Water Authority protocols, and therefore, effects associated with Water Authority activities potential hazardous materials use are not anticipated to result in significant impacts. Potential hazardous materials impacts by Covered Activities would be determined and mitigation provided through subsequent environmental review and approvals, when required. In addition, none of the alternatives contain any provisions that would create safety hazards for any public airports, private airstrips, or interfere with any emergency response plans, or existing or future emergency response plans or emergency evacuation plans. The Water Authority currently complies, and will continue to comply, with all applicable hazardous materials regulations. Thus, the issue of safety hazards/hazardous materials was not considered to be a potentially significant issue that warranted detailed analysis in this draft EIR/EIS.

7.7 Mineral and Energy Sources

None of the proposed alternatives would directly impact valuable known mineral or energy resources or mineral or energy recovery sites. Further analysis of these resources was thus not considered to be warranted in this draft EIR/EIS. As stated previously, Water Authority activities may require further environmental review related to any potential effects on mineral resources as well as local or regional energy supplies and adopted energy conservation plans at the time that projects are proposed. There is a potential for the designation of a Preserve Area to restrict the recovery of mineral resources, although this would actually affect only a little over 1,920 acres within the entire Plan Area which has already been set aside for conservation. In general, this effect is expected to be minor because of the limited extent of potential resources affected relative to their distribution within the Plan area and because of preexisting land use or environmental constraints. For example, the establishment of the Tijuana Wetlands HMA does prevent the recovery of mineral resources, but the project would not have significant impacts because of preexisting restrictions at the site from land use jurisdictions that prevent their development. There is the potential that some lands brought into conservation have other public values related to use of mineral and energy resources, which would be precluded by conservation restrictions. Any mineral and energy resource impacts by Covered Activities would be determined and mitigation provided through subsequent environmental review and approvals, when required.

7.8 Noise

None of the proposed alternatives would generate or expose people or wildlife to any significant direct noise or vibrations, and in general, implementation of any of the alternatives is considered to have little adverse effect on the ambient noise environment. For these reasons noise was not considered to be an issue that warranted detailed analysis in this draft EIR/EIS.

Water Authority activities implemented under any of the alternatives have the potential to directly generate noise. Construction activities, routine vehicular use, and some operational machinery may generate noise in proximity to sensitive receptors. The Water Authority would use BMPs and similar practices to minimize noise effects in developed areas. However, it is not expected that implementation of any of the alternatives would significantly alter existing noise conditions. Noise generating activities, such as O&M Activities, are currently conducted by the Water Authority, and would continue in the future, with or without implementation of one of the alternatives. Temporary changes to the local noise environment may result from implementation of some projects and associated construction noise; however, these noise level increases would be short-term. Many of the Water Authority activities occur in undeveloped areas, where construction noises would not impact residences or businesses. For Water Authority activities located in undeveloped areas, temporary increases in noise levels would be constrained by noise requirements to minimize impacts on sensitive species. As stated in Sections 6.4.2.1, 6.4.2.5, and 6.11.6 of the Plan, the Water Authority will employ specific measures to minimize impacts to Covered Species from noise. These may include setbacks/buffers, temporary noise barriers, limited hours of work, and/or disseminating materials about edge effects. The Conservation Analysis (see Appendix B of the Plan) also includes additional measures for noise-sensitive species (e.g., least Bell's vireo). Potential operation, maintenance, and construction noise impacts by Covered Activities would be determined and mitigation provided through subsequent environmental review and approvals, when required.

7.9 Population and Housing

As discussed in Section 5.0 (Growth Inducement), the Water Authority is not a land use agency and does not make decisions regarding the timing, location, or magnitude of growth and development, the primary activities affecting population and housing within the Plan Area. However, the Water Authority plans and executes CIP projects and O&M activities to meet current and future water demands derived from population projections and analysis conducted by SANDAG and the local general purpose governments. The Water Authority reviews and adjusts its CIP program on an annual basis to reflect changes in population growth projections, which can result in timing, capacity, or location changes for future water delivery facilities. The Water Authority CIP thus functions as a

dynamic program that can be adapted to accommodate and reflect the changing environment of the area. Its activities can be viewed as accommodating existing and projected future water supply demands rather than providing excess capacity for unplanned growth. For these reasons, population and housing were not considered to be issues that warranted further analysis in this draft EIR/EIS. Potential population and housing impacts by Covered Activities would be determined and mitigation provided through subsequent environmental review and approvals, when required.

7.10 Recreation

None of the proposed alternatives would impact existing recreation resources, such as trails and opportunities for hiking. In some portions of the Preserve Area, compatible public recreational use may be allowed, providing an increase in outdoor recreational opportunities. None of the alternatives would negatively affect existing active recreation areas, such as ball fields or other facilities. The alternatives would also not generate an increased need for these types of recreation facilities. For these reasons, recreation was not considered to be an issue that warranted further analysis in this draft EIR/EIS.

Potential recreation impacts by Covered Activities would be determined and mitigation provided through subsequent environmental review and approvals, when required.

7.11 Transportation/Circulation

None of the proposed alternatives would directly generate any traffic or transportation related issues. The alternatives also would not impact the development of planned roadways nor interfere with regional traffic plans.

The majority of the Plan Area is addressed by SANDAG's 2020 Regional Transportation Plan (RTP) and the 2007 draft update that addresses transportation needs through 2030 (SANDAG 2007b). The purpose of the RTP is to reduce regional impacts related to regional growth and transportation. Implementation of the proposed Plan would not affect the rate or amount of development and associated transportation facilities. Therefore, transportation issues associated with growth and development would be similar under any of the alternatives. The same amount of growth and required transportation facilities would occur under all alternatives and independent of the proposed project and in all cases would conform with assumptions in the RTP. Traffic and circulation was thus not considered a potentially significant issue warranting further analysis in this draft EIR/EIS.

Water Authority activities under each of the alternatives, including construction of water supply facilities and vehicular use during construction and conducting O&M Activities, are not expected to significantly impact existing or planned transportation facilities.

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Pipeline projects and ancillary support facilities have flexibility to be designed and constructed to avoid and minimize potential impacts to transportation facilities. Implementation of any of the alternatives is not expected to increase traffic congestion, affect levels of service, increase the need for parking, preclude development of planned roadways, or increase safety risks or affect emergency access. Potential transportation and circulation impacts by Covered Activities will be determined and mitigation provided through subsequent environmental review and approvals, when required.