



ENVIRONMENTAL ASSESSMENT FOR THE CAHUILLA INDIAN HEALTH CLINIC REPLACEMENT PROJECT VOLUME I



November 2020

Prepared for:
Bureau of Indian Affairs
Pacific Region Office



Prepared by:
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ENVIRONMENTAL ASSESSMENT

CAHUILLA INDIAN HEALTH CLINIC REPLACEMENT PROJECT ANZA, CALIFORNIA

**U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF INDIAN AFFAIRS
PACIFIC REGION OFFICE**



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GLOSSARY, ABBREVIATIONS AND ACRONYMS

Glossary

Action Area – For consultation under the federal Endangered Species Act of 1973, as amended, the Action Area is defined by regulation as all areas to be affected directly or indirectly by the action and not merely the immediate area involved in the action (50 CFR §402.02(d)).

Affected Environment – A description of the existing environment to be affected by the Proposed Action (40 CFR 1502.15).

Alternative – A reasonable way to fix the identified problem or satisfy the stated need. It is used to compare and present the environmental impacts of the Proposed Action to alternatives to provide a clear basis for choice among options by the decisionmaker and the public. (40 CFR 1502.14).

Council on Environmental Quality (CEQ) – Established under Title II of NEPA to develop Federal agency-wide policy and regulations for implementing the procedural provisions of NEPA, resolve interagency disagreements concerning proposed major Federal actions, and to ensure that Federal agency programs and procedures are in compliance with NEPA.

Cumulative Impact (Effect) – The incremental environmental impact or effect of the Proposed Action, together with impacts of past, present, and reasonably foreseeable future actions, regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7).

Environmental Assessment (EA) – A concise public document, prepared in compliance with NEPA, that briefly discusses the purpose and need for an action, alternatives to such action, and provides sufficient evidence and analysis of impacts to determine whether to prepare an environmental impact statement or finding of no significant impact (40 CFR 1508.9).

Environmental Consequences – Environmental effects of project alternatives, including the Proposed Action, any adverse environmental effects which cannot be avoided, the relationship between short-term uses of the human environment, and any irreversible or irretrievable commitments of resources which would be involved if the proposal should be implemented (40 CFR 1502.16).

Finding of No Significant Impact (FONSI) – A document prepared in compliance with NEPA, supported by an environmental assessment, that presents the reasons why a Federal action will

have no significant effect on the quality of the human environment and for which an environmental impact statement, therefore, will not be prepared 40 CFR 1508.13).

Human Environment – Includes the natural and physical environment and the relationship of people with the environment (40 CFR 1508.14).

Impact (Effect) – A direct result of an action which occurs at the same time and place; or an indirect result of an action which occurs later in time or in a different place and is reasonably foreseeable; or the cumulative results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions (40 CFR 1508.8).

Lead Agency – The agency or agencies responsible for preparing the environmental assessment (40 CFR 1508.16).

Major Federal Action – Actions with effects that may be major and which are potentially subject to Federal control and responsibility (40 CFR 1508.18).

Minor – Environmental effects are not detectable or are so minor that they will neither destabilize nor noticeably alter any important attribute of the resource.

Mitigation – Planning actions taken to: avoid an impact altogether; minimize the degree or magnitude of the impact; reduce or eliminate the impact over time by preservation and maintenance operations; rectifying the impact by repairing, rehabilitating, or restoring the affected environment; or, compensating for the impact by replacing or providing substitute resources or environments (40 CFR 1508.20).

Moderate – Environmental effects are sufficient to alter noticeably, but not to destabilize, important attributes of the resource.

National Environmental Policy Act of 1969 (NEPA) – Requires all agencies to examine the environmental impacts of their actions, incorporate environmental information, and utilize public participation in the planning and implementation of all actions. Federal agencies must integrate NEPA with other planning requirements and prepare appropriate NEPA documents to facilitate better environmental decision making.

No Action Alternative – The alternative where current conditions and trends are projected into the future without another Proposed Action (40 CFR 1502.14(d)). The No Action alternative is not to take the action.

Proposed Action – The project, activity, or decision that a federal agency intends to implement or undertake.

Relationship of Short-Term Uses and Long-Term Productivity – The balance or trade-off between short-term uses and long-term productivity need to be defined in relation to the proposed activity in question. Each resource, of necessity, has to be provided with its own definitions of short- term and long-term (40 CFR 1502.16).

Severe – Environmental effects are clearly noticeable and are sufficient to destabilize important attributes of the resource.

Significantly – “Significantly” as used in NEPA requires consideration of both context and intensity (40 CFR 1508.27). (a) Context. This means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. (b) Intensity. This refers to the severity of impact.

Temporary Impacts – Impacts of project alternatives that may occur during project construction.

Unavoidable Adverse Effects – Unavoidable adverse effects caused by the Proposed Action and Action Alternatives that would remain after applying the proposed mitigation measures.

Undertaking – A project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license or approval (36 CFR 800.16 (y)).

Abbreviations and Acronyms

ADT	average daily trips
AI/AN	American Indian/Alaska Native
APE	Area of Potential Effects
APN	Assessor's Parcel Number
ARPA	Archaeological Resources Protection Act
AQMP	Air Quality Management Plan
ASTM	American Society for Testing Materials
BIA	Bureau of Indian Affairs
BMPs	Best Management Practices
BRG	BRG Consulting, Inc.
BSA	biological study area

Abbreviations and Acronyms

BsD2	Bull Trail (soil)
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emission Estimator Model
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CBRA	Coastal Barrier Resources Act
CEDC	Cahuilla Economic Development Corporation
CEQ	Council on Environmental Quality
CESA	Cumulative Effects Study Area
CFR	Code of Federal Regulations
CHRIS	California Historical Resources Information System
CO	Carbon Monoxide
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
dB	Decibel
dBA	A-Weighted Decibel
DEH	Department of Environmental Health
DTSC	Department of Toxic Substances Control
EA	Environmental Assessment
EIC	Eastern Information Center
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Endangered Species Act, Federal
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
FONSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
GIS	Geographic Information System

Abbreviations and Acronyms

gr	granitic rock
HSC	Health and Safety Code
I-	Interstate
IAM	Indian Affairs Manual
IBC	International Building Code
ICC	International Code Council
ITE	Institute of Transportation Engineers
km	kilometer
LEED	Leadership in Energy and Environmental Design
Leq	Equivalent Sound Pressure Level
Lmax	Maximum Sound Pressure Level
Lmin	Minimum Sound Pressure Level
MBTA	Migratory Bird Treaty Act
MCLs	Maximum Contaminant Levels
mg/m ³	milligrams per cubic meter
MsC	Mottsville sandy loam
MSL	mean sea level
ML	sandy silt
MWMP	Medical Waste Management Plan
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NO ₂	Nitrogen Dioxide
NOI	Notice of Intent
NO _x	Oxides of Nitrogen
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
O ₃	ozone
Pb	lead
PM ₁₀	Particulate Matter (10 microns in diameter or less)
PM _{2.5}	Particulate Matter (2.5 microns in diameter or less)

Abbreviations and Acronyms

POLS	petroleum, oil, and lubricants
ppb	parts per billion
ppm	parts per million
QaL	alluvium
RMS	root mean squared
ROG	Reactive Organic Gas
RSBCIHI	Riverside-San Bernardino County Indian Health, Inc.
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SDWA	Safe Drinking Water Act
SF	square feet
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SLF	Sacred Lands File
SM	silty sand
SO ₂	Sulfur Dioxide
SOx	Sulfur Oxides
SPCC	Spill Prevention, Control and Countermeasure
SR	State Route
SSA	Sole Source Aquifer
SWPPP	Stormwater Pollution Prevention Plan
THPO	Tribal Historic Preservation Officer
U.S.	United States
U.S.C.	United States Code
USDA	United States Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
USGS	United States Geological Survey
µg/m ³	Micrograms Per Cubic Meter

1.0 INTRODUCTION

This Environmental Assessment (EA) has been prepared for the Bureau of Indian Affairs (BIA) to support an application from the Riverside-San Bernardino Indian Health Clinics, Inc. (RSBIHCI) to lease approximately 3.01 acres of land within the Cahuilla Indian Reservation (Proposed Action), in compliance with the National Environmental Policy Act (NEPA) and other relevant federal laws, Executive Orders and regulations. The BIA is the federal agency that is charged with reviewing and approving business leases. The RSBCIHI proposes to construct and operate a replacement Cahuilla Indian Health Clinic on a portion of Assessor Parcel Number 572-190-004, located within Section 33, Township 7 South, Range 2 East, within the Cahuilla Indian Reservation in Riverside County (Proposed Action). Figure 1-1 shows the regional location of the Project site, and Figure 1-2 shows the Project site in relation to the Tribe's Reservation and the surrounding area.

This federal action requires the preparation of an EA in accordance with the requirements set forth in NEPA, the Council on Environmental Quality Regulations for Implementing NEPA (40 CFR 1500–1508), and the BIA NEPA Guidebook (59 Indian Affairs Manual [IAM] 3-H; BIA 2012). NEPA requires that environmental consequences associated with the Proposed Action and the Alternatives to the Proposed Action be evaluated in this document.

BRG Consulting, Inc. (BRG), on behalf of the RSBCIHI and under the direction of the BIA, has been contracted to prepare this EA. The BIA is the lead federal agency for purposes of complying with NEPA and all other federal environmental laws, regulations, Executive and Secretarial Orders. Environmental analysis of the resources potentially susceptible to direct, indirect and cumulative impacts from the Proposed Action found no significant negative impacts along with minor beneficial impacts. This EA describes the Proposed Action and No-Action alternative, the affected environment, environmental consequences, and mitigation measures. The key areas analyzed in the EA include land resources, water resources, air resources, living resources (including special status species, wildlife, and vegetation), cultural resources, socioeconomic and environmental justice conditions, important farmlands, noise, transportation, resource use patterns, and other values.

The Department of the Interior regulations (43 CFR 46.300(a)) specify that an EA must be prepared for any Federal action except those: (1) covered by a CE; (2) covered by an earlier environmental document; or (3) a decision has already been made to prepare an Environmental Impact Statement (EIS). The EA is the document that provides sufficient analysis for determining whether a proposed action may or will have a significant impact on the quality of the human environment and therefore require the preparation of an EIS.

On August 15, 2017, President Trump issued Executive Order (EO) 13807, *Establishing Discipline and Accountability in the Environmental Review and Permitting Process for Infrastructure Projects*, to ensure the federal environmental review and permitting process for infrastructure projects is coordinated, predictable, and transparent. Shortly after the issuance of EO 13807, on August 31, 2017, the Secretary of the Department of the Interior (DOI) issued Secretarial Order (SO) 3355, *Streamlining NEPA Reviews and Implementation of EO 13807*. This SO dovetails with EO 13807 regarding the DOI's overall efforts to streamline the NEPA process. SO 3355 applies to all DOI actions and sets page and time limit requirements for Environmental Impact Statements. On August 6, 2018, the DOI Deputy Secretary issued an additional memorandum regarding *Additional Direction for Implementing Secretary's Order 3355 Regarding Environmental Assessments*. This memorandum includes an EA page limit of 75 pages, and a timeline of 180 days to complete the EA process from application to the signing of a Finding of No Significant Impact (or a Notice of Intent to prepare an EIS if warranted).

Accordingly, this EA has been prepared for the BIA to support the RSBIHCI requests for approval of a lease by the Division of Real Estate Services. This approval represents the Proposed Action. The construction and operation of the replacement health clinic and commodity distribution center constitute the Proposed Project. The BIA will use this EA to determine if the Proposed Action and subsequent Proposed Project would result in adverse effects to the environment.

This document has been prepared in accordance with the requirements set out in NEPA (42 United States Code [USC] §4321 et seq.), the Council on Environmental Quality (CEQ) Guidelines for Implementing NEPA (40 CFR Parts 1500-1508), the BIA's NEPA Guidebook (59 Indian Affairs Manual [IAM] 3-H), Executive Order 13807 and Secretarial Order 3355. Section 2.0 of this EA provides a detailed description of the Project Alternatives. Section 3.0 provides a description of the existing environmental conditions on and in the vicinity of the Project site, an analysis of the potential environmental consequences associated with the Project Alternatives, and impact mitigation measures. Section 4.0 describes cumulative and growth-inducing effects.

Consistent with the requirements of NEPA, the BIA will review and analyze the environmental consequences associated with the Proposed Action and Project Alternatives and either determine that a Finding of No Significant Impact (FONSI) is appropriate, request additional analysis, or request that an Environmental Impact Statement (EIS) be prepared.

1.1. Riverside-San Bernardino County Indian Health, Inc. (RSBCIHI)

The RSBCIHI, is a Native American healthcare organization consisting of a consortium of nine tribes located throughout Riverside and San Bernardino Counties including Agua Caliente, Cahuilla, Morongo, Pechanga, Ramona, San Manuel, Santa Rosa, Soboba, and Torres-Martinez. RSBCIHI provides culturally sensitive healthcare to eligible Native Americans and their families

residing in Riverside or San Bernardino counties. RSBCIHI's current facilities include five health clinics; two (2) Community Health Representative Program offices; an Outreach Office; and, a Commodity Warehouse. Formed in 1986, their mission is to provide culturally sensitive healthcare, respect, and abide by the traditional customs of the Indian Communities they serve; to promote wellness and provide early intervention to achieve healthy lifestyles. In FY 2016, the RSBCIHI had a total of 33,817 Registered Patients¹ and 14,231 Active Indian Patients² (Indian Health Services, 2019).

1.2. Background

The Cahuilla Band of Indians are a federally recognized tribe of Native American Indians located near the town of Anza California in western Riverside County. The Cahuilla Reservation was established by Executive Order on December 27, 1875 and currently has a land base of 18,884 acres. All lands are held in trust, with 16,884 acres belonging to individual members of the Tribe and 2,000 acres belonging to the Tribe in common.

1.2.1. Existing Cahuilla/Santa Rosa Health Clinic

The existing Cahuilla Santa Rosa Health Clinic, located at 39100 Contreras Rd #C, Anza, CA 92539, serves American Indian/Alaskan Native (AI/AN) persons and is operated pursuant to a health care services contract or compact entered into under the Indian Self-Determination and Education Assistance Act, Public Law 93-638. The existing clinic offers a variety of non-emergency medical and community services including:

- Alcohol/ Chemical Dependency
- Behavior Health/Mental Health Services
- Dental Hygiene
- Family Practice/Internal Medicine
- Immunizations Clinics
- Nutrition
- Obstetrics and Gynecology
- Pain Management
- Pediatric Care
- Podiatry
- Preventive Medicine

These services are provided Monday through Thursday, from 8:00 AM to 5:00 PM and Fridays from 8:00 AM to 2:00 PM. The clinic is closed on weekends and holidays.

¹ An eligible Indian individual who has obtained health care services from an Indian health program at least once.

² An eligible Indian individual who resides in a designated community and who has obtained health care services from an Indian health program at least once during the past three years.

1.2.2. Location and Setting

The Project site is located within the unincorporated community of Anza, in Riverside County, California. It consists of approximately three (3) acres situated on the north end of Assessor Parcel Number (APN) APN 572-190-004 at approximately 33°31'23.88" North Latitude and -116°46'34.32" West Longitude, within Sec. 33, T7S, R2E, San Bernardino Meridian. Additionally, the Project site is located within the northeast portion of the Cahuilla Indian Reservation on the United States Geological Survey (USGS) 7.5-minute topographic quadrangle of Cahuilla Mountain.

The site is bordered on the north by State Route 371 (SR-371)/Cahuilla Road, and by vacant land on the south, east and west (Figure 1-2). The nearest metropolitan areas are the City of Hemet, approximately 19 miles (30.6 kilometers [km]) to the north, and the City of La Quinta, 27.7 miles (47.7 km) north east. The Project site is currently vacant of all structures and contains sparse desert vegetation. The nearest residential uses are within Lake Riverside Estates, located north of SR-371 approximately 1.1 miles (1.8 km), south of the Project site.

Regional access to the Project site is provided by Interstate 15 (I-15) and State Route 79 (SR-79) on the west or by State Route 74 (SR-74), State 111 (SR-111) or State Route 86 (SR-86) on the west. SR-79 and SR-74 are the nearest north/south routes and are located approximately 9 miles (14.5 km) west and 10.5 miles (16.9 km) east of the Project site, respectively. Local access to the Project site is provided by SR-371/Cahuilla Road. SR 371/Cahuilla Road is a two-lane paved road aligned in a general east-west direction between its western terminus at SR-79 and its eastern terminus at SR-74.

The Project site is located within the mountainous Peninsular Ranges that extend from the western edge of the continental borderland to the Salton Trough and from the Transverse Ranges Physiographic Province in the north to the tip of Baja California in the south. The climate of the unincorporated Anza Community is characterized by hot, dry summers and mild to cold winters with seasonally heavy precipitation that occurs principally during the winter months. Precipitation averages 9.65 inches annually (WeatherCurrents.com. 2019). Temperatures range between 44- and 75-degrees Fahrenheit, on the average, with Summer daily highs near 90 degrees Fahrenheit (Climate-Data.org. 2019).

1.3. Purpose and Need for the Proposed Action

The federal Proposed Action is the approval of a commercial lease under [25 U.S.C. 415\(a\)](#) for the construction and operation of a replacement health care facility on the Cahuilla Indian Reservation. The purpose of the Proposed Action is to provide improved health care services and assure that comprehensive, culturally acceptable personal and public health services are available and accessible to American Indian people residing in Riverside and San Bernardino Counties. These

services are needed to maintain and promote the health status and overall quality of life for eligible Native Americans and their families.

Implementation of the Proposed Action would assist the RSBCIHI in meeting the following project objectives:

- Construct and operate a new health care facility on the Cahuilla Reservation;
- Provide access to a modern health care facility for American Indians/Alaska Natives that would improve the clinical quality of, and increase their access to health care services; and,
- Replace the existing health clinic with a larger facility and increased staff levels that can accommodate increased patient loads.

1.4. Overview of the Environmental Review Process

This EA is intended to satisfy the environmental review process of 59 IAM 3-H, 40 CFR § 1501.3, and 40 CFR § 1508.9. After reviewing this EA and any public input received, either a FONSI will be issued or additional environmental analysis will be conducted.

1.5. Environmental Issues Addressed

In accordance with NEPA, and based on a review of the Project site, the following environmental issue areas are evaluated in this EA:

- Land Resources;
- Air Quality and Climate Change;
- Cultural Resources;
- Important Farmlands
- Noise
- Other Values
- Water Resources;
- Living Resources;
- Socioeconomic Conditions / Env. Justice;
- Resource Use Patterns
- Transportation

1.6. Resource Categories Not Affected by Proposed Action

The following issues and impact topics were dismissed from further analysis in this EA:

1.6.1. Coastal Resources

The Coastal Zone Management Act (CZMA) encourages states to preserve, protect, develop, and where possible, restore or enhance valuable natural coastal resources such as wetlands, floodplains, estuaries, beaches, dunes, barrier islands, and coral reefs, as well as the fish and wildlife using those habitats. The CZMA and its implementing regulations require federal agencies proposing

actions, whether within or outside of a State's coastal zone, to determine if the action is reasonably likely to affect any land or water use or natural resource within that coastal zone. The nearest coastal zone is located 40 miles west of the Project site and would not be affected by the Proposed Action. For this reason, this topic is dismissed from further analysis.

1.6.2. Wild and Scenic Rivers

The National Wild and Scenic Rivers Act is administered by four (4) federal agencies: the Bureau of Land Management, the National Park Service, the U.S. Fish and Wildlife Service, and the U.S. Forest Service. The Act protects selected rivers, and their immediate environments, which possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values. There are no Wild and Scenic Rivers within the vicinity of the Project site. The nearest wild and scenic river is Bautista Creek located in within the San Bernardino National Forest. It is located approximately 5.7 miles northeast of the Project site and would not be affected by the Proposed Action. For this reason, this topic is dismissed from further analysis.

1.6.3. Wetlands

Executive Order 11990, *Protection of Wetlands*, requires federal agencies to take action to minimize the destruction, loss or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands in carrying out the agency's responsibilities. Wetlands are areas that are inundated or saturated by surface or ground water at a frequency and duration to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs and similar areas, and are protected under the federal Clean Water Act (CWA) Section 404 permit program. The Natural Resource Conservation Service (NRCS) maps soils in the area as "MsC - Mottsville sandy loam, 2 to 8 percent slopes" and "BsD2 - Bull Trail sandy loam, 8 to 15 percent slopes" (NRCS, 2018a). These soil types are not identified as a hydric soil (NRCS, 2018b).

A biological survey of the Project site was conducted by Merkel & Associates, Inc. (M&A) on July 24, 2019 (Merkel & Associates, Inc., 2019; Appendix C) which further concluded that there are no wetlands on or near the Project site. Therefore, this topic is dismissed from further analysis.

1.6.4. Coastal Barrier Resources

The Coastal Barrier Resources Act (CBRA) restricts Federal expenditures and financial assistance which would have the effect of encouraging development of coastal barriers. The Act established a Coastal Barrier Resources System consisting of those undeveloped coastal barriers located on the Atlantic and Gulf coasts of the United States. The coastal barriers provide habitat for migratory birds and wildlife, and contain resources of extraordinary scenic, scientific, natural, historic, and other importance. The project area is not in the vicinity of the Coastal Barrier Resources System; therefore, this topic is dismissed from further analysis.

1.7. Regulatory Requirements and Approvals

The following direct and indirect federal or state actions may occur as a result of the Proposed Action:

- Consultation with the Tribal Historic Preservation Office (THPO) under Section 106 of the National Historic Preservation Act (NHPA);
- National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activity in compliance with the U.S. Environmental Protection Agency (EPA).
- Issuance of an Encroachment permit for the driveway entrance from SR-371 from the California Department of Transportation (Caltrans).
- Issuance of a BIA permit for archaeological investigations, in accordance with the Archaeological Resources Protection Act of 1979 (ARPA), for cultural resources construction monitoring.

2.0 ALTERNATIVES

2.1. Proposed Action

The BIA is considering the approval of a business lease agreement for the construction and operation of a replacement health care facility on the Cahuilla Reservation in the unincorporated community of Anza, Riverside County, California. The existing Cahuilla Santa Rosa Indian Health Clinic serves American Indian/Alaskan Native (AI/AN) persons and is operated pursuant to a health care services contract or compact entered into under the Indian Self-Determination and Education Assistance Act, Public Law 93-638. The new Cahuilla Indian Health Clinic would provide space to support a modern and adequately staffed health care delivery program. The new clinic would ensure availability of the medical services needed to maintain and promote the health status and overall quality of life for the residents of the service area.

2.1.1. Proposed Replacement Clinic

The proposed replacement clinic would consist of a single-story building, approximately 11,600 square feet (SF) in size on a 3-acre portion of APN 572-190-004, located immediately south of SR-371/Cahuilla Road and 0.9 miles north east of Puckit Drive in the Anza community of Riverside County. The Project would provide a covered outdoor area; stormwater retention basin; a septic system; an underground water storage tank; 90 parking spaces along with landscaping and lighting. Vehicle access to the site would be provided by new driveway from SR-371. The proposed Site Plan and proposed Building Elevations are provided on Figures 2-1 and 2-2, respectively. Non-emergency medical and community services, described in Section 1.0 would

continue to be provided from 8:00 AM to 5:00 PM, Monday through Thursday; and from 8:00 AM to 2:00 PM on Friday.

It is anticipated that the building in which the existing Cahuilla Health Clinic is located would be reused for rural commercial uses, as permitted within the County of Riverside's C-R Zone.

2.1.2. Construction

Construction would include clearing of existing vegetation, site grading and paving, construction of a 4-lane driveway entrance/exit from SR-371, construction of a covered outdoor area, and installation of landscaping and lighting within the parking area. Construction would also include installation of a new 185,000-gallon underground water storage tank; installation of a stormwater retention basin sized to retain precipitation from a 100-year storm event; and, extension of electrical lines to the site. The site's wastewater would be handled by a new septic tank and 4,000-square-foot leach field system, located west of the health clinic and covered outdoor area.

Site preparation would involve minor cuts and fills in order to achieve the desired building pad elevation and provide adequate gradients for site drainage. Construction would comply with Executive Order 13717, Section 3(a), Establishing a Federal Earthquake Risk Management Standard. Additionally, the proposed facilities would conform to the applicable building code requirements of the California Building Code (CBC) and California Public Safety Code (CPSC), including building, electrical, mechanical, plumbing, energy, fire protection, and safety.

The new facilities would take approximately six (6) months to construct. Construction activities will occur between 7:00 AM and 7:00 PM on weekdays and will voluntarily be conducted in accordance with the County of Riverside General Noise Regulations found in Chapter 7.35.010 and 7.35.020 of the Code of Ordinances. Approximately 40 construction jobs would be provided in the short term. Employment at the replacement health clinic would be offered first to California tribal members and then to local community residents.

The horizontal area of disturbance is a 4-acre portion of APN 572-190-004 and was determined through reviews of project plans, estimations of maximum potential for ground disturbance, topographic and geographical constraints, etc. The vertical area of disturbance would range between six-inches and 5-feet for construction of the new site access, the building pad, utilities, septic system and retention basin.

2.2. No Action Alternative

The No Action Alternative is considered as a baseline for comparison of environmental effects (including direct, indirect and cumulative effects) and demonstrates the consequences of not meeting the need for the action. Under the No Action Alternative, a replacement health clinic

would not be constructed, and health care services would continue to be provided at the existing Cahuilla Indian Health Clinic. As a result of the No Action Alternative, the quality of health care services would not be improved, and additional patient loads could not be accommodated.

2.3. Alternatives Considered But Rejected

Section 1502.14 of the CEQ's Regulations for Implementing NEPA require that Federal agencies explore and objectively evaluate all reasonable alternatives to a Proposed Action, and to briefly discuss the rationale for eliminating any alternatives that were not considered in detail. Two alternatives were considered, in addition to the Proposed Action, but were dismissed from further analysis. The alternatives are discussed below.

2.3.1. Alternative 1 - Existing Health Clinic Site

Alternative 1 consists of developing the new/replacement facility at the site of the existing Cahuilla Santa Rosa Indian Health Clinic, located at 39100 Contreras Rd # C, Anza, CA 92539. This alternative was rejected because the existing clinic operates within leased space in an existing commercial building and there is insufficient space at the current location to accommodate expansion. Additionally, health care services at the Cahuilla Reservation would be unavailable during the six-month construction period.

2.3.2. Alternative 2 – Alternative Project Sites

Four alternatives Project sites (**Figure 2-3**) were considered but rejected either because the sites were too small; the sites support existing structures and uses that would require demolition and possibly relocation; or would result in additional infrastructure costs. A summary of the alternative sites and the rationale for elimination is provided on Table 2-1.

TABLE 2-1. SUMMARY OF ALTERNATIVE PROJECT SITES, CONDITIONS AND REASONS FOR REJECTION

Alternative Project Site	Size Development Condition	Distance/ Direction (*)	Location	Reason for Rejection
Alternative Site 1	2.1 acres (0.85 ha) Vacant	5.9 miles/ 9.4 kilometers northeast	North of SR-371, east of Bahrman Road and west of Bailiff Road	Alternative Site 1 is too small. Does not provide sufficient space for replacement clinic and supporting infrastructure.
Alternative Site 2	2.3 acres (0.93 ha) Vacant	5.9 miles/ 9.4 kilometers northeast	North of SR-371, east of Bahrman Road and west of Bailiff Road	Alternative Site 2 is too small. Does not provide sufficient space for replacement clinic and supporting infrastructure.

TABLE 2-1. SUMMARY OF ALTERNATIVE PROJECT SITES, CONDITIONS AND REASONS FOR REJECTION

Alternative Project Site	Size Development Condition	Distance/ Direction (*)	Location	Reason for Rejection
Alternative Site 3	4 acres (1.62 ha) Developed	6.8 miles/ 11 kilometers northeast	North of SR-371 and west of McDonald Lane	Entire property consists of 13.68 acres and is developed with a single-family residence as well as commercial and industrial buildings. Demolition of the existing buildings, and possible relocation of existing business would be required.
Alternative Site 4	4 acres (1.62 ha) Vacant	6.5 miles/ 10.46 kilometers northeast of the project site	South of SR- 371, north of Valley View Road, and east of Anza Road	Alternative Site 4 consists of 3 separate lots (Lots 11, 16 and 17) and is divided by Karen Road easement. This road provides access for residential properties immediately south of the site and cannot be vacated. Lots on either side of Karen Road would require separate stormwater improvements to prevent runoff from entering the ROW.

Notes:

* Denotes distance and direction from proposed Project site.

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

3.1. Land Resources

3.1.1. Affected Environment

Sladden Engineering prepared a Geotechnical Investigation for the Cahuilla Indian Health Clinic Project in November 2018 (Sladden, 2018, Appendix A), which included a review of published and unpublished geotechnical and geological literature regarding seismicity at and near the Project site, as well as an evaluation of engineering properties and characteristics of subsurface materials. This report is included as Appendix B of the EA. Subsurface conditions at the site were investigated by drilling ten (10) exploratory boreholes to depths of between approximately 5 and 15 feet (1.5 and 4.57 m) below the existing ground surface.

Topography

The Project site is located within the Peninsular Ranges Physiographic Province of California. The Peninsular Ranges are mountainous areas that extend from the western edge of the continental borderland to the Salton Trough and from the Transverse Ranges Physiographic Province in the north to the tip of Baja California in the south. The Peninsular Ranges Physiographic Province is

characterized by northwest-trending topographic and structural features that locally include the San Jacinto Structural Block. The San Jacinto Structural Block is a northwest-southeast trending elongated structural block bounded on the southwest by the San Jacinto Fault and by the San Andreas Fault Zone to the northeast. The province is characterized by elongated, northwest-southeast trending mountain ranges and valleys and is truncated at its northern margin by the east-west grain of the Transverse Ranges. The Project site is underlain by alluvium (Qal) and Mesozoic granitic rock (gr) formations (Sladden, 2018, Appendix A). Additionally, the Project site is located within a relatively flat area at an elevation of approximately 3,490 feet (1,064 m) above mean sea level.

Soils

There are two mapped soil series on the Project site. The majority of the site is MsC - Mottsville sandy loam, 2 to 8 percent slopes (NRCS, 2018c). This soil is found on alluvial fans with slopes from 2 to 8 percent and is excessively drained. Its parent material is described as alluvium derived from igneous rock and is considered prime farmland if irrigated. The remaining portion of the site is BsD2 - Bull Trail sandy loam, 8 to 15 percent slopes, eroded. This soil is found on alluvial fans with slopes from 8 to 15 percent and is well drained. Its parent material is described as alluvium derived from igneous and metamorphic rock and is not considered prime farmland.

According to borings conducted at the Project site, silty sand (SM) and sandy silt (ML) was encountered to depths between approximately 1 and 12 feet below grade surface (Sladden, 2018, Appendix B). Underlying the fill and extending to maximum depths explored, bedrock was encountered. The materials appeared yellowish brown, fine grained, and low plasticity.

No natural ponding of water or surface seeps were observed at or near the Project site during Sladden's investigation. No groundwater was encountered at the maximum explored depth of 15 feet (4.57 m).

Geologic Setting and Seismicity

Faults

The Project site is located in the highly seismic Southern California region within the influence of several fault systems that are considered to be active or potentially active. An active fault is defined by the State of California as a "sufficiently active and well-defined fault" that has exhibited surface displacement within the Holocene epoch (about the last 11,000 years). A potentially active fault is defined by the State as a fault with a history of movement within Pleistocene time (between 11,000 and 1.6 million years ago). The site is not located within a State of California Alquist-Priolo active fault zone. Alquist-Priolo zones are well-defined areas located within seismically active zones,

typically along active fault zones susceptible to surface fault ruptures. The nearest potentially active fault is the San Jacinto-Anza, located 6.4 miles (10.3 km) away.

Landslides and Liquefaction

No signs of slope instability in the form of landslides, rock falls, earthflows or slumps were observed at or near the Project site. According to the County of Riverside, the Project site is situated within a “Very High” liquefaction potential zone, however the Project site is underlain with shallow seated bedrock. For this reason, risks associated with liquefaction are considered negligible (Sladden, 2018, Appendix A).

Tsunamis and Seiches

The Project site is situated at an inland location and is not immediately adjacent to any impounded bodies of water. For this reason, the risks associated with tsunamis and seiches are considered negligible.

Mineral Resources

No known minerals or mineral rights exist in the project area. Additionally, no known paleontological resources are documented in the project footprint. Mineral resource zones within Riverside County are shown on Figure 4.14.1 of the Riverside County General Plan Environmental Impact Report (EIR) (EIR Report No. 521, Section 4.14 Mineral Resources, February 2015a). The Project site is located with a mineral resource area (County of Riverside, 2015a).

3.1.2. Regulatory Framework

Executive Order (EO) 13717

EO 13717, *Establishing a Federal Earthquake Risk Management Standard*, establishes minimum levels of seismic safety in buildings owned, leased, financed, or regulated by the Federal government, which is to be achieved by satisfying the requirements of referenced building codes and standards, as outlined in Section 3 of the EO. Specifically, Section 3(a) requires each agency to ensure that every new building is in compliance with the earthquake-resistant design provisions of the 2015 editions of the International Building Code (IBC), nationally recognized building codes promulgated by the International Code Council (ICC), or equivalent codes. When determining the code requirements for new construction, major renovation, and/or replacement of real property, the BIA uses the latest published code at the design contract execution date.

California Building Code (CBC)

The CBC (California Code of Regulations Title 24, Part 2) encompasses a number of requirements related to geologic issues. Specifically, these include general provisions (Chapter 1); structural

design (Chapters 16/16A); structural tests and special inspections, including seismic resistance (Chapters 17/17A); soils and foundations (Chapters 18/18A); concrete (Chapters 19/19A); masonry (Chapters 21/21A); wood, including consideration of seismic design categories (Chapter 23); glass and glazing (Chapter 24); construction safeguards (Chapter 33); and grading, including excavation, fill, drainage, and erosion control criteria (Appendix J). All occupancies in California are subject to national model codes adopted into Title 24, and occupancies are further subject to amendments adopted by state agencies and ordinances implemented by local jurisdictions' governing bodies. As noted in Chapter 2, the proposed facilities would voluntarily conform to the applicable building code requirements of the California Building Code (CBC) and California Public Safety Code (CPSC), including building, electrical, mechanical, plumbing, energy, fire protection, and safety.

3.1.3. Environmental Consequences

3.1.3.1 Proposed Action

Topography

Under the Proposed Action, the entire Project site, would be disturbed by site preparation activities in accordance with local grading permit requirements. However, because the site is flat, the Proposed Action would have negligible impacts on topography. The Project site would be contoured to an even grade according to architectural and engineering design specifications. The portion of the site disturbed for the utilities would be returned to existing grade. This would have a permanent, negligible to minor, adverse impact on the topography of the area.

Soils

As with most construction projects involving the use of heavy equipment, there is a small risk of accidental fuel or chemical spills, and potential contamination of soils. To reduce this potential fuels would be stored and maintained in a designated equipment staging area or equipment would be fueled offsite. A Spill Prevention, Control and Countermeasure (SPCC) Plan would be included in the Stormwater Pollution Prevention Plan (SWPPP) to identify the appropriate emergency response in case of a release of petroleum fluids into the environment. Emergency spill kits containing absorption pads, absorbent material, a shovel or rake, and other cleanup items, would be available on site in the event of an accidental spill. Following these precautions, the potential for an accidental chemical or fuel spill to occur and result in adverse impacts on soils would be negligible.

The NPDES under the Clean Water Act (CWA) prohibits the discharge of any pollutant, including sediments, to waters of the United States. The discharge of stormwater runoff from construction sites is regulated under the NPDES program. The Project will be required to apply for an NPDES

General Permit for Storm Water Discharges Associated with Construction Activity through the US Environmental Protection Agency.

The chief requirements of the NPDES general permit for construction sites are a construction Notice of Intent (NOI) and the preparation and implementation of a SWPPP. SWPPPs contain site-specific non-structural and structural best management practices (BMPs) to reduce soil erosion and prevent pollution from petroleum, oil, and lubricants (POLs) and other chemicals or hazardous/toxic materials at construction sites. Specifically, SWPPP plans assess the characteristics of the site such as nearby surface waters, topography, and storm water runoff patterns; identify potential sources of pollutants such as sediment from disturbed areas, and stored wastes or fuels; and identify BMPs which will be used to minimize or eliminate the potential for these pollutants to reach surface waters through storm water runoff.

By utilizing standard construction BMPs, such as installing perimeter silt fences, spreading straw and mulch to protect exposed ground, and covering stockpiles of earth or soils, runoff, erosion and impacts to on-site and offsite soils would be minimized. Erosion control methods would also be in place to control the fugitive dust produced during construction activities. Dust control could be provided through the use of water applied on exposed earth or the application of calcium chloride on gravel surfaces. With implementation of standard construction BMPs, impacts to soil resources would be negligible to minor and adverse.

Seismic Considerations

The main geotechnical concerns in the construction of the replacement clinic are the presence of loose near surface soil and shallow seated bedrock. Remedial grading, including over-excavation and re-compaction of the surface soil and bedrock for the building and foundation areas, would be required to mitigate this adverse effect.

In compliance with EO 13717 and the California Building Code, recommendations presented in Geotechnical Investigation would be incorporated into the project's design and carried out through construction. Use of the IBC design and construction standards would allow ground shaking-related hazards to be managed from a geologic, geotechnical, and structural standpoint such that adverse impacts to the health or safety of workers or members of the public would be minimized.

Mineral Resources

There are no known mineral resources of local, regional, or national importance on the Project site. Therefore, no impacts to mineral resources would occur.

3.1.3.2 No Action Alternative

Under the No Action alternative, the Cahuilla Indian Health Clinic Replacement Project would not be constructed. The Project site would continue in its present use or could be developed with other allowable uses. Grading and construction activities associated with the replacement health clinic would not occur and there would be no direct, or indirect impacts to land resources. Health care services would continue to be provided at the existing clinic location.

3.1.4. Mitigation Measures

Mitigation Measure Soils-1: SWPPP

The RSBCIHI shall prepare a SWPPP to be administered during grading and project construction. The SWPPP must contain BMPs that meet the technical standards of the General Construction Permit to ensure that on- and off-site erosion during construction is minimized and that no water quality standards are violated. The SWPPP must address spill prevention and include an SPCC Plan describing measures to ensure proper collection and disposal of all pollutants handled or produced on the site during construction. BMPs included in the SWPPP must be consistent with the California Stormwater Best Management Practices Handbook for Construction and typically consist of various erosion and sediment control measures. Regular inspections of the erosion and sediment control measures would be performed after any storm event by qualified personnel, and as required in the NPDES General Permit. All disturbed areas would be stabilized and revegetated with native plant vegetation following commencement of construction activities. Proper seed selection would result in native plants with deep root systems, which would increase local times of concentration and reduce site outflows. The potential to impact soils from sediment and contamination would be minimized through use of BMPs described above.

Mitigation Measure Soils-2: Seismic Mitigation Compliance

In compliance with EO 13717, Section 3(a), mitigation for seismic considerations would follow the recommendations in the Geotechnical Investigation.

Earthwork and Grading

Earthwork including excavation, backfill and preparation of the subgrade soil, shall be performed in accordance with the geotechnical recommendations presented in Appendix B and applicable portions of the Riverside County grading requirements. All earthwork should be performed under the observation and testing of a qualified soil engineer.

- **Stripping.** Areas to be graded should be cleared of any existing vegetation, associated root systems, and debris. All areas scheduled to receive fill should be cleared of old fills and any irreducible matter. The stripplings should be removed off site or stockpiled for later use

in landscape areas. Voids left by obstructions should be properly backfilled in accordance with the compaction recommendations of Appendix B.

- **Preparation of the Building Areas.** In order to achieve firm and uniform foundation bearing conditions, over-excavation and re-compaction is recommended throughout all building areas. All native low density near surface soil should be removed to a depth of at least 3 feet below existing grade or 2 feet below the bottom of the footings, whichever is deeper. Remedial grading should extend laterally, a minimum of five feet beyond the building perimeter. The soil exposed during the over-excavation should then be scarified, moisture conditioned to within two percent of optimum moisture content, and compacted to at least 90 percent relative compaction. Testing of the native soil within the excavation bottoms should be performed during grading to verify adequacy.
- **Compaction.** Soil to be used as engineered fill should be free of organic material, debris, and other deleterious substances, and should not contain irreducible matter greater than 12 inches in maximum dimension. All fill materials should be placed in thin lifts, not exceeding six inches in their loose state. If import fill is required, the material should be of a low to non-expansive nature and should meet the criteria identified in the Geotechnical Investigation. The subgrade and all fill material should be compacted with acceptable compaction equipment, to at least 90 percent relative compaction. The bottom of the exposed subgrade should be observed by a qualified soil engineer prior to fill placement. Compaction testing should be performed on all lifts in order to ensure proper placement of the fill materials.
- **Remedial Grading.** Excavation and re-compaction within the building envelope and extending laterally for 5 feet beyond the building limits and to a minimum of 3 feet below existing grade or 2 feet below the bottom of the footings, whichever is deeper.
- **Native/ Import Engineered Fill.** Should be placed in thin lifts not exceeding 6 inches in a loose condition, compact to a minimum of 90 percent relative compaction within 2 percent of the optimum moisture content.
- **Asphalt Concrete.** Compact the top 12 inches to at least 95 percent compaction within 2 percent of optimum moisture content.
- **Shrinkage and Subsidence.** Volumetric shrinkage of the material that is excavated and replaced as controlled compacted fill should be anticipated (less than 15 percent). Subsidence of the surfaces that are scarified and compacted should be between 1 and 2 tenths of a foot.

Liquefaction

Continuous spread footings and isolated pad footings should be used for the proposed structure in order to mitigate potential liquefaction related differential settlements and should be designed to meet criteria identified in the Geotechnical Investigation.

Slabs-On-Grade

Concrete slabs-on-grade must be placed on properly compacted engineered fill soil as outlined in the Geotechnical Report. The slab subgrade should remain near optimum moisture content and should not be permitted to dry prior to concrete placement. Slab subgrades should be firm and unyielding, Disturbed soil should be removed and replaced with engineered fill soil compacted to a minimum of 90 percent relative compaction.

Pavement Design

Asphalt concrete pavements should be designed in accordance with Topic 608 of the Caltrans Highway Design Manual based on R-Value and Traffic Index. Asphalt concrete should conform to Sections 203 and 302 of the latest edition of the Standard Specifications for Public Works Construction ("Greenbook"). Class II aggregate base should conform to Section 26 of the Caltrans Standard Specifications, latest edition. The aggregate base course should be compacted to at least 95 percent of the maximum dry density as determined by the American Society for Testing Materials (ASTM) Test Method D 1557.

Corrosion Series

The soluble sulfate concentrations of the surface soil were determined to be 140 and 120 parts per million (ppm). The soil is considered to have a "low" corrosion potential with respect to concrete. The use of Type V cement and special sulfate resistant concrete mixes should not be necessary. Soluble sulfate content of the surface soil should be reevaluated after grading and appropriate concrete mix designs should be established based upon post-grading test results.

The pH levels of the surface soil were determined to be 8.0 and 7.9. Based on soluble chloride concentration testing (50 & 80 ppm) the soil is considered to have a "low" corrosion potential with respect to normal grade steel. The minimum resistivity of the surface soil was found to be 4300 and 1500 ohm-cm³, which suggests the site soil is considered to have "moderate" corrosion potential with respect to ferrous metal installations. A corrosion expert should be consulted regarding appropriate corrosion protection measures.

³ The term ohms-cm ("ohms centimeter") refers to the measurement of the "volume" resistivity (also known as "bulk" resistivity) of a semi-conductive material. The value in ohms-cm is the inherent resistance of a given material regardless of the shape or size

Utility Trench Backfill

All utility trench backfill should be compacted to a minimum relative compaction of 90 percent. Trench backfill materials should be placed in lifts no greater than six inches in a loose condition, moisture conditioned (or air-dried) as necessary to achieve near optimum moisture condition and mechanically compacted in place to a minimum relative compaction of 90 percent. A representative of the project soil engineer should test the backfill to verify adequate compaction.

Exterior Concrete Flatwork.

To minimize cracking of concrete flatwork, the subgrade soil below concrete flatwork areas should first be compacted to a minimum relative compaction of 90 percent. A representative of the project geotechnical consultant should observe and verify the density and moisture content of the soil prior to concrete placement.

Drainage

All final grades should be provided with positive gradients away from foundations to provide rapid removal of surface water runoff to an adequate discharge point. No water should be allowed to be pond on or immediately adjacent to foundation elements. In order to reduce water infiltration into the subgrade soil, surface water should be directed away from building foundations to an adequate discharge point. Subgrade drainage should be evaluated upon completion of the precise grading plans and in the field.

3.2. Water Resources

3.2.1. Affected Environment

Basin Boundaries and Hydrology

The Cahuilla Indian Reservation lies within two Hydrologic Regions: the South Coast and Colorado (Cahuilla Band of Indians, 2018). The Project site is located within the South Coast Hydrologic Region and is underlain by the Cahuilla Valley Groundwater Basin (Basin Number 9-06 per DWR's Bulletin 118) (Department of Water Resources, 2004). The 28.4 square mile basin is bounded by impermeable crystalline rocks of the Peninsular Ranges and the northeastern boundary is the San Jacinto fault zone. Cahuilla Creek drains surface water westward toward the Pacific Ocean.

The groundwater basin provides water resources to the Cahuilla Reservation and the Anza Valley in south-central Riverside County. The basin is managed publicly by the Cahuilla Indian Reservation and privately by the Anza Mutual Water Company.

Surface Water and Drainage

The Cahuilla Reservation relies on the Cahuilla Creek as a major surface water source (Cahuilla Band of Indians, 2018). Cahuilla Creek is 18 miles long and travels through the southeastern section to the northwest section of the Reservation. The Project site is located approximately 0.30 miles (0.48 km) south of the Cahuilla Creek and no surface waters, natural ponding or surface seeps were observed on- site during the geological investigation (Sladden, 2018, Appendix A).

Site drainage appears to be controlled via sheet flow and surface infiltration. Regional drainage is provided by Cahuilla Creek and associated tributaries located to the south of the site (Sladden, 2018, Appendix A).

Groundwater, Levels, Trends and Quality

As reported in the California Groundwater Bulletin 118, groundwater levels within the Cahuilla Valley Groundwater Basin have steadily declined as a result of widespread pumping in the Anza Valley. The basin has shown a decline in water level of about 35 feet from 1952 through 1976, then a rise of about 10 feet from 1976 through 1986, then a slow decline through 1992. The current storage capacity from the time of the report (2004) is estimated at 75,000-acre feet. The character of the groundwater quality of the Cahuilla Valley Basin ranges from sodium-calcium bicarbonate to sodium chloride in character. Total Dissolved Solids (TDS) concentrations ranged from 304 to 969 mg/L in 1956. Locally, sulfates and nitrates are high for domestic use and nitrate concentrations reach as much as 128 mg/L.

3.2.2. Regulatory Framework

Clean Water Act (CWA), Section 402

CWA Section 402 regulates construction-related stormwater discharges to surface waters through the NPDES program. On tribal lands in California, the EPA retains authority for administering the NPDES program and has developed a General Permit for Discharges from Construction Activities, Permit No. CAR10I000 (US EPA, 2017). Projects that disturb one or more acre of land or projects that disturb less than one acre but are part of a larger common plan of development that, in total, disturbs one or more acre, are required to obtain coverage under this general permit.

This process includes preparation of a SWPPP and submittal of a NOI to EPA at least 14 calendar days before commencing construction activities. During construction, the contractor would be responsible for preparing and implementing a SWPPP, installing stormwater controls, implementing erosion and sediment controls and maintaining stormwater BMPs to prevent the discharge of sediment from the site.

Safe Drinking Water Act (SDWA)

The Safe Drinking Water Act (SDWA), originally passed by Congress in 1974, was enacted to protect the quality of drinking water in the United States. Primary drinking water regulations established legally enforceable levels for contaminants that can affect people's health. Maximum Contaminant Levels (MCLs) were set to be as close as possible to the level that is known to have adverse health effects. Secondary drinking water regulations are non-enforceable guidelines regulating contaminants that can cause cosmetic or aesthetic effects.

The EPA's Sole Source Aquifer (SSA) Program, established in 1977 under the SDWA, requires evaluation of projects to determine if they have the potential to contaminate a sole source aquifer. The nearest sole source aquifers, namely Campo/Cottonwood Creek and Ocotillo-Coyote Wells, are located approximately 44.5 miles (71.6 kilometers) southeast and 58.6 miles (94.3 kilometers) due south of the Project site, respectively (US EPA, 2019).

Executive Order (EO) 11988 - Floodplain Management and Protection

Executive Order 11988, Floodplain Management and Protection (May 24, 1977), directs federal agencies to avoid, to the extent possible, the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct or indirect support of floodplain development wherever there is a practicable alternative. A preliminary review of potential flooding on the Project site was conducted utilizing Federal Emergency Management Agency (FEMA) maps. Flood Insurance Rate Map (FIRM) Map 06065C2800G indicates the Project site lies within Zone "D". The Zone D designation is used for areas where there are possible, but undetermined, flood hazards, as no analysis of flood hazards has been conducted.

Executive Order 11990, Protection of Wetlands

Executive Order 11990, Protection of Wetlands (May 24, 1977), directs federal agencies to avoid, to the extent possible, adverse impacts associated with the destruction or modification of wetlands. Under DOE regulations, a wetlands assessment is required for any action involving wetlands (10 CFR 1022). As described in Section 3.4, a biological survey of the Project site confirmed that there are no wetlands on or near the Project site.

3.2.3. Environmental Consequences

Proposed Action

Operation of the replacement health clinic would result in a slight increase in water use, above current levels. Fire flows and water for fire storage would be provided in accordance with applicable fire insurance codes. The replacement health clinic would rely on on-site water wells for potable water and fire flows, which has adequate water supplies through 2040.

The construction phase of the project would require coverage under EPA Region 9 NPDES CGP. This would require preparation and implementation of a SWPPP and inspection and maintenance of stormwater BMPs throughout the construction phase of the project. General construction impacts associated with the development of the Project site could affect water resources by increased stormwater runoff from the site carrying sediment and contamination loads off-site during times of heavy rain, and by contamination from construction activities infiltrating area soils and percolating down into the groundwater.

The incorporation of the mitigation measures into the design phase of the Proposed Project would reduce impacts to water resources below the level of significance.

Development of the replacement health clinic would introduce impermeable or substantially less permeable surfaces than present groundcover. This could affect water infiltration at the Project site. However, the Project site would be graded to direct surface water run-off to a storm water retention basin, sized to retain precipitation from a 100-year storm event. Collected run-off would be allowed to percolate back into the ground to recharge the groundwater table. The proposed increase in impermeable surfaces resulting from implementation of the Proposed Project would be minimal compared the groundwater recharge area of the East Coachella Valley. Therefore, project impacts with regard to groundwater depletion and groundwater interference would be adverse and minor.

Sole Source Aquifer

The Proposed Action would not require the drilling of drinking water supply wells. Additionally, the nearest designated sole source aquifers are located 44.5 miles (71.6 kilometers) southeast and 58.6 miles (94.3 kilometers) due south of the Project site, respectively and would not be affected. Overall impacts to water resources would be negligible to minor.

No Action Alternative

Under the No Action Alternative, the Cahuilla Indian Health Clinic Replacement Project would not be constructed. The Project site would continue in its present use or could be developed with other allowable uses. Grading and construction activities associated with the replacement health clinic would not occur and there would be no direct, or indirect impacts to water resources. Health care services would continue to be provided at the existing clinic location and would result in no changes to water resources.

3.2.4. Mitigation Measures

BMPs would be placed along portions of the site perimeter to control erosion during all construction activities. Driveways and parking areas would be designed to minimize both the volume and velocity of runoff. Pavement should be minimized; buffers of native vegetation should be maximized to prevent excessive velocity buildup of runoff. The Project site would be graded to

direct surface water run-off to a storm water retention basin to reduce runoff leaving the Project site. The replacement health clinic would be Leadership in Energy and Environmental Design (LEED) certified and would incorporate water-conserving fixtures in accordance with the certification requirements.

3.3. Air Quality

Birdseye Consulting Group, Inc. prepared an Air Quality Report for the proposed Cahuilla Indian Health Clinic Replacement Project to document existing climate and ambient air quality in the Region and at the Project site and identify the effects of construction and operation of the Proposed Action (Birdseye, 2019). A copy of this report is included as Appendix B. The air quality rules and regulations that apply to the Proposed Action are also presented in Appendix B. The Regulatory Context for Air Quality is included in Section 3.3 of Appendix B.

3.3.1. Affected Environment

The Project site is located in the Riverside County portion of the South Coast Air Basin (SCAB) which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD).

The climate of the SCAB is similar to the southern California region, which is characterized by hot, dry summers and mild to cold winters with seasonally heavy precipitation that occurs principally during the winter months. Like the region, the climate of the SCAB is influenced by the moderating effects of the Pacific Ocean. The mountain ranges that surround the SCAB constrain the horizontal movement of air and also inhibit the dispersion of air pollutants out of the region. Precipitation is less than three inches annually and occurs mostly in the winter months from active frontal systems. Temperatures range from 39 to 99 degrees Fahrenheit, on the average, with daily highs near 100 degrees Fahrenheit during July and August.

Air quality is defined by ambient air concentrations of specific pollutants identified by the EPA to be of concern with respect to health and welfare of the general public. The EPA is responsible for enforcing the Federal Clean Air Act (CAA) of 1970 and its 1977 and 1990 Amendments, which required the EPA to establish National Ambient Air Quality Standards (NAAQS). These standards identify concentrations of the ambient air pollutants below which no adverse effects on the public health and welfare are anticipated. In response, the EPA established primary and secondary standards for several pollutants (called “criteria” pollutants). “Primary standards” are designed to protect human health and “Secondary standards” are designed to protect property and the public welfare from air pollutants in the atmosphere. Criteria pollutants include ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), respirable particulate matter of 10 microns or less (PM_{10}), respirable particulate matter of 2.5 microns or less ($PM_{2.5}$) and lead (Pb).

The CAA allows states to adopt ambient air quality standards and other regulations provided they are at least as stringent as federal standards. The California Air Resources Board (CARB) established the more stringent California Ambient Air Quality Standards (CAAQS) for the six original criteria pollutants through the California Clean Air Act of 1988, and as well as CAAQS for additional pollutants, including sulfates, hydrogen sulfide, vinyl chloride and visibility-reducing particles. The NAAQS and CAAQS are presented in Table 3-2 of Appendix B.

Regional Air Quality

National and California Ambient Air Quality Standard Designations

As described above, the EPA regulates six air pollutants (criteria pollutants) for which standards for safe levels of exposure have been set under the Clean Air Act of 1990: ozone, carbon monoxide, nitrogen dioxide, particulate matter, sulfur dioxide and lead. Areas where air pollution levels persistently exceed either the National Ambient Air Quality Standard or the California Ambient Air Quality Standards may be designated “nonattainment.”

As shown on Table 3.3-1, Riverside County is classified as a federal nonattainment area for PM_{2.5}. It is classified as a state nonattainment area for ozone (8-hour standard), PM₁₀ and PM_{2.5}, and as an extreme nonattainment area for ozone (1-hour standard).

Table 3.3-1. Attainment Status – South Coast Air Basin

Pollutant	Attainment Status South Coast Air Basin	
	Federal	State
Ozone – 1 hour	N/A	Extreme Nonattainment
Ozone – 8 hours (2015 Standard)	Designation Pending	Nonattainment
CO	Attainment (Maintenance)	Attainment
NO ₂	Attainment	Attainment
SO ₂	Attainment	Attainment
PM ₁₀	Attainment (Maintenance)	Nonattainment
PM _{2.5}	Nonattainment	Nonattainment

Source: Birdseye Consulting Group, Inc. 2019 (Appendix B).

In addition to criteria pollutants, the EPA and CARB both regulate greenhouse gases.

Greenhouse Gas Emissions

Greenhouse gases (GHGs) are gases that trap heat in the atmosphere. These emissions occur from natural processes as well as human activities. The accumulation of GHGs in the atmosphere

regulates the earth's temperature. Scientific evidence indicates a trend of increasing global temperature over the past century due to an increase in GHG emissions from human activities.

Recent observed changes resulting from global warming include shrinking glaciers, thawing permafrost, a lengthened growing season, and shifts in plant and animal ranges (Intergovernmental Panel on Climate Change, 2007). Predictions of long-term environmental impacts due to global warming include sea level rise, changing weather patterns with increases in the severity of storms and droughts, changes to local and regional ecosystems including the potential loss of species, and a significant reduction in winter snowpack.

The most common GHGs emitted from natural processes and human activities include carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). Examples of GHGs created and emitted primarily through human activities include fluorinated gases (hydrofluorocarbons and perfluorocarbons) and sulfur hexafluoride. Each GHG is assigned a global warming potential (GWP). The GWP is the ability of a gas or aerosol to trap heat in the atmosphere. The GWP rating system is standardized to CO₂, which has a value of one. For example, CH₄ has a GWP of 21, which means that it has a global warming effect 21 times greater than CO₂ on an equal-mass basis.

Total GHG emissions from a source are often reported as a CO₂ equivalent (CO₂e). The CO₂e is calculated by multiplying the emission of each GHG by its GWP and adding the results together to produce a single, combined emission rate representing all GHGs. Executive Order 13834, Efficient Federal Operations was signed by President Trump on May 17, 2018 with a goal for federal agencies to ensure that new construction conform to application building energy efficiency requirements and sustainable design principles. Consistent with the requirements of E.O. 13834 Section 2(a-g), effective management of overall operations with respect to reducing facility energy consumption, meeting renewable energy targets, minimizing waste, increasing fleet efficiency, advancing sustainable buildings, and improving efficiency will drive reductions of corresponding GHG emissions. Additionally, the California Global Warming Solutions Act of 2006 directs the State of California to reduce statewide GHG emissions to 1990 levels by the year 2020.

General Conformity

The EPA is responsible for ensuring that air quality protects public health and welfare. Under the EPA's General Conformity Rule, any federal agency responsible for an action in a nonattainment area is required to determine that the action conforms to the applicable State Implementation Plan (SIP) or is exempt from the General Conformity Rule requirements. The General Conformity Rule applies only to emissions caused by federal actions that occur in a federal nonattainment or maintenance area. The Project site is located in an area that is classified as a federal nonattainment area for PM_{2.5}. Therefore, if project emissions are equal to or exceed applicable de minimis levels

for any criteria air pollutant provided in 40 CFR §93.153 (b)(1) and (2), then a federal general conformity determination analysis would be required.

Because the Project site is located within the SCAQMD and because the Cahuilla Band of Indians do not have an approved Tribal Implementation Plan (USEPA, 2019), to conform with the SIP the Proposed Project must comply with the SCAQMD's 2016 Air Quality Management Plan (AQMP).

Sensitive Receptors

Sensitive receptors are facilities that house or attract children, the elderly, and people with illnesses or others who are especially sensitive to the effects of air pollutants. Hospitals, schools, convalescent facilities, and residential areas are examples of sensitive receptors. The nearest sensitive receptors are residential uses located approximately 3,000 feet (900 meters) west of the Project site.

3.3.2. Environmental Consequences

3.3.2.1 Proposed Action

The effects on air quality were assessed by developing emission estimates associated with proposed construction and operational activities. Emission calculations were based on anticipated on-road vehicle use, off-road equipment use, and land disturbance.

Construction

The Cahuilla Indian Health Clinic Replacement Project would be constructed over a period of approximately six (6) months. During this time, criteria air pollutants would be emitted from the engine exhaust of diesel- and gasoline-fueled vehicles and construction equipment. Heavy-duty diesel- and gasoline-powered equipment and vehicles at the Project site would include loaders, graders, backhoes, cranes, and trucks. Emissions of fugitive dust would be generated by grading activities and vehicle travel for construction of the replacement clinic. Construction-related traffic generation would include equipment delivery, on- and off-site vehicle and construction equipment, and automobile trips for construction workers in personal vehicles commuting to and from the Project site.

Construction typically proceeds in distinct phases: construction is initiated with site preparation, and paving, which is then followed by erection of structures, and finally the finishing of those structures and infrastructure. Of these phases, site preparation can generate fugitive dust and diesel equipment emissions of PM₁₀ and PM_{2.5}. Construction and finishing of structures typically result in greater reactive organic gas (ROG) and oxides of nitrogen (NOx) emissions associated with diesel and gasoline combustion stationary equipment, mobile equipment, and worker vehicle trips.

The daily emissions presented in Table 3.3-2 represent the highest estimated emissions on a given day from all concurrent construction activities. Detailed emission calculations are presented in Appendix A (Air Emissions) of the Air Quality Technical Report (Appendix C) and were calculated using the California Emission Estimator Model (CalEEMod 2016.3.2) which is the latest version of the air quality model approved by the EPA for use in California.

Additionally, the SCAQMD has developed Localized Significance Thresholds (LSTs) for the following criteria pollutants: NO_x, CO, PM₁₀ and PM_{2.5}. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. LSTs only apply to emissions within a fixed stationary location, including idling emissions during both project construction and operation and are not applicable to mobile sources such as cars on a roadway. The Project site is located in Source Receptor Area 27 (SRA-27, Anza Area). The nearest sensitive receptors are residential uses located approximately 3,000 feet west of the site.

As shown on Table 3.3-2, the level of emissions from construction of the Proposed Project, including ROG, NO_x, CO, SO_x, PM₁₀ and PM_{2.5}, would not exceed SCAQMD thresholds. Additionally, the Project would not exceed the applicable LSTs. Therefore, the adverse air quality impacts during construction would be temporary and minor. No mitigation would be required.

Operations

Operational emissions would be comprised primarily of mobile sources emissions associated with transporting patients, vendors and employees to/from the clinic as well as from operation of the clinic (energy, water and solid waste) and were calculated using the California Emission Estimator Model (CalEEMod 2016.3.2). Operational emissions are summarized on Table 3.3-2.

Table 3.3-2. Construction and Operations Criteria Pollutant Emissions

Emission Source	ROG	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Total Construction Emissions, lbs./day	7.9	20.9	15.1	0.02	3.7	2.1
SCAQMD Significance Thresholds	75	100	550	150	150	55
Above Significance Thresholds?	No	No	No	No	No	No
Operational Emissions	1.05	5.4	8.1	0.03	2.3	0.6
Above Significance Thresholds?	No	No	No	No	No	No
Federal De Minimis Thresholds	10	10	100	N/A	70	100
Above <i>De Minimis</i> Thresholds?	No	No	No	No	No	No
Local Significance Threshold (25 meters)		234	1,100		7	4
Above LST Significance Threshold?		No	No		No	No

Table 3.3-2. Construction and Operations Criteria Pollutant Emissions

Emission Source	ROG	NOx	CO	SOx	PM ₁₀	PM _{2.5}
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Source: Birdseye Consulting Group, Inc. 2019 (Appendix B).

As shown on Table 3.3-2, the long-term operational emissions of ROG, NOx, CO, SOx, PM₁₀ and PM_{2.5} would not exceed SCAQMD thresholds. Adverse air quality impacts would be minor, and no mitigation would be required.

The Proposed Project conforms with the SCAQMD's 2016 AQMP because air emissions would not exceed the thresholds presented in Table 3.3-2. Additionally, emissions are below the SCAQMD and Federal De Minimis thresholds for ROG, NOx, CO, SOx, PM₁₀ and PM_{2.5}. A less than significant impact would occur. Accordingly, a Conformity Determination is not required under 40 CFR Part 51, Subpart W.

Greenhouse Gas Emissions

The potential effects of proposed GHG emissions are by nature global and cumulative impacts, as individual sources of GHG emissions are not large enough to have an appreciable effect on climate change. Therefore, the impact of proposed GHG emissions to climate change is discussed in the context of cumulative impacts. There are no known past, present, and foreseeable future activities within the Project Area that could have the potential to result in cumulative air quality impacts. The Project would provide necessary medical care for Tribal members and reduce the need to travel off the reservation for routine health care services. Because overall travel associated with obtaining medical care would be reduced, it is not anticipated that the Project would result in long-term cumulatively considerable impacts.

Greenhouse gas emissions do not result in direct impacts (CNRA, 2009). They are addressed only on a cumulative basis. Table 3.3-3 presents a summary of the estimated greenhouse gas emissions.

Table 3.3-3. Proposed Greenhouse Gas Emissions

Emission Source	CO ₂	CH ₄	NO ₂
	Emissions, metric tons/year		
Construction Emissions	155.8 (5.19)	0.02	0.0
Operating Emissions	463.08	0.4	0.01
TOTAL	468.27	0.42	0.01
CO ₂ Equivalent			468.7

Source: Birdseye Consulting Group, 2019 (Appendix B).

Total construction emissions are estimated to be 155.8 metric tons of CO₂E. Amortized over the 30-year life of the project, a total of 5.19 metric tons was added to the operational emissions. Total CO₂E emissions would be 396.3 metric tons. The estimated total is below the SCAQMD's

proposed threshold of 3,000 metric tons of CO₂e. The level is also below the 900-metric ton CO₂E threshold proposed by the California Air Pollution Control Officers Association (CAPCOA) as a threshold below which further analysis is not required. This level of GHG emissions would not result in a cumulatively considerable impact on global climate.

3.3.2.2 No Action Alternative

Under the No Action Alternative, the Cahuilla Indian Health Clinic Replacement Project would not be constructed. The Project site would continue in its present use or could be developed with other uses. Emissions associated with travel to/from the existing clinic would continue, but construction related emissions would be avoided. Health care services would continue to be provided at the existing clinic location.

3.4. Living Resources

3.4.1. Affected Environment

Merkel & Associates, Inc. prepared a Biological Resource Report for the proposed Cahuilla Indian Health Clinic Replacement Project to document existing biological conditions within the biological study area (BSA); and identify potential impacts to biological resources (Merkel & Associates, 2019). A copy of this report is included as Appendix D. Evaluation activities included examination of aerial photography for the site, conducting a general biological survey, and a review of the U.S. Fish and Wildlife Service (USFWS) special status species records and critical habitat designations for the project vicinity. A nest survey was also conducted during the general biological survey to determine the presence and location of any active nests (or previously active nests) of avian and/or raptor species.

The BSA is located within a relatively flat area at an elevation of approximately 3,490 feet (1,064 m) above mean sea level (MSL). Soil types mapped for the project area include Mottsville sandy loam, 2 to 8% slopes; and Bull Trail sandy loam, 8 to 15% slopes eroded (Merkel & Associates, 2019, Appendix D).

3.4.1.1 Vegetation

During the general biological field survey, conducted in July 2019, four (4) vegetation types were identified within the BSA, including non-native grassland, disturbed habitat and urban/developed land (Figure 3.4-1). A small patch of red shank chaparral was also identified within the BSA, outside of the Project site boundary, across the dirt road to the east.

The Project site itself is dominated by very dense, thatched, low-quality non-native grassland which does not provide open areas typically necessary for ground nesting avian species, burrowing wildlife species, or foraging raptors. The northeastern corner of the Project site is devoid of vegetation; consists entirely of bare ground and is mapped as disturbed habitat.

3.4.1.2 Wetlands

Based on the field survey, no federal wetlands occur within the Project site due to the lack of all three wetland parameters (i.e., wetland dominant vegetation, hydric soils, and wetland hydrology) onsite.

3.4.1.3 Wildlife

Due to the disturbed nature of the area, few faunal species were observed or are expected to occur within the BSA. The only invertebrate observed on the site was one butterfly species, checkered white (*Pontia protodice*). The only mammal species detected (i.e., scat) on the site was the San Diego black-tailed jackrabbit (*Lepus californicus bennettii*). No amphibians, reptiles or avian species were observed on site.

Potentially expected species to utilize the Project site (but were not observed during the survey) include common species such as western fence lizard (*Sceloporus occidentalis*), gophersnake (*Pituophis catenifer*), northern mockingbird (*Mimus polyglottos*), house finch (*Haemorhous mexicanus*), western meadowlark (*Sturnella neglecta*), western kingbird (*Tyrannus verticalis*), mourning dove (*Zenaida macroura*), deer mouse (*Peromyscus maniculatus*) and coyote (*Canis latrans clepticus*). Common raptors that may forage over the BSA include red-tailed hawk (*Buteo jamaicensis*) and red-shouldered hawk (*Buteo lineatus*).

3.4.1.4 Federally Threatened and Endangered Listed Species

No federally threatened and/or endangered listed species and/or potentially suitable habitat for federally listed species were identified within the project BSA during the biological survey. Further, no federally listed animal and/or plant species are expected to occur within the project BSA primarily due to the lack of suitable habitat.

The USFWS GIS database recorded two (2) federally listed species, quino checkerspot butterfly (*Euphydryas editha quino*) and Stephens' kangaroo rat (*Dipodomys stephensi*) have been recorded within a 2.4-mile radius of the Project site. However, the density and thatched condition of on-site non-native grassland, compacted soils, and lack of vegetation would preclude both listed species from occurring on the Project site.

No designated critical habitat for any federally listed species occurs within or directly adjacent to the project action area.

3.4.1.5 Wildlife Corridors

Wildlife corridors are important in preserving species diversity. Connections between areas of open space are integral to maintaining biological diversity and population viability. For the purposes of this EA, wildlife corridors are defined as a linear landscape feature utilized by resident

or transient wildlife for movement between two blocks of habitat. The Project site is surrounded by undeveloped land to the west and south that supports non-native grassland, SR-371 to the north, as well as Cahuilla Creek further north, and chaparral habitat to the east. The BSA does not feature landscape/topography that typically facilitates wildlife movement such as a canyon, ridgeline, or riparian corridor and is not a part of a regional or local wildlife corridor.

3.4.2. Regulatory Framework

3.4.2.1 Biological Resources

Federal Migratory Bird Treaty Act

Under the Migratory Bird Treaty Act (MBTA), it is unlawful, except as permitted by the USFWS, to “take, possess, transport, sell, purchase, barter, import, or export all species of birds protected by the MBTA, as well as their feathers, parts, nests, or eggs. Take means to pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to pursue, hunt, shoot, wound, kill, trap, capture, or collect (50 CFR 10.12).” It is important to note that “take” as defined under the federal MBTA is not synonymous with “take” as defined under the federal Endangered Species Act (ESA). The MBTA definition of “take” lacks a “harm and harassment” clause comparable to “take” under the ESA, thus, the MBTA authority does not extend to activities beyond the nests, eggs, feathers, or specific bird parts (i.e., activities or habitat modification in the vicinity of nesting birds that do not result in “take” as defined under the MBTA are not prohibited).

Due to the limited amount of potentially suitable nesting habitat within the project BSA, the Project site has the potential to be utilized by a limited amount of ground nesting regionally common migratory birds that are protected under the MBTA. In addition, due to the lack of trees, the Project site does not support potentially suitable nesting raptor habitat.

Invasive and Noxious Species

On February 3, 1999, President William J. Clinton signed EO 13112 requiring federal agencies to combat the introduction or spread of invasive species in the United States. The order defines invasive species as “any species, including its seeds, eggs, spores, or other biological material capable of propagating that species, that is not native to that ecosystem whose introduction does or is likely to cause economic or environmental harm or harm to human health.” Under E.O. 13112, federal agencies cannot authorize, fund, or carry out actions that it believes are likely to cause or promote the introduction or spread of invasive species in the United States or elsewhere unless the agency has determined that the benefits of the actions outweigh the potential harm caused by invasive species and that all reasonable measures to minimize risk of harm will be taken in conjunction with the actions. Any federal invasive animal species or noxious weed species found to be present must be considered as part of the NEPA analysis for the Proposed Project.

The U.S. Department of Agriculture, Natural Resources Conservation Service (NRCS) Federal Noxious Weed List webpage (<https://plants.usda.gov/java/noxious>) provides the most current noxious weed list. The NRCS also maintains a list of invasive animal species.

As part of the Biological Resource Study (Appendix D), the NRCS Federal Noxious Weed List was cross-referenced with the flora observed within the Project site to determine if any species were considered invasive/noxious weed species, as defined by the above referenced list/source. No invasive plant species as identified on the federal Noxious Weed List occur within the Project site. However, biological field survey identified one invasive plant species, downy brome (*Bromus tectorum*), as identified on the federal NRCS Invasive Species List which occurs within the project BSA. Downy brome occurs within the non-native grassland onsite.

3.4.3. Environmental Consequences

3.4.3.1 Proposed Action

Direct impacts were determined by overlaying the project action area boundary on the mapped vegetation communities/habitats in GIS ESRI software platforms. Indirect impacts were determined based on the design, intended use, and location of the project elements relative to biological resources within the project area and surroundings.

Habitats/Vegetation Communities

The Proposed Project would result in direct impacts to 2.79 acres of low-quality non-native grassland and 0.22 acre of disturbed habitat. The loss of these onsite low-quality habitats that are not federal wetlands and do not support federally listed species would not be significant. No mitigation would be required.

The project construction activities may temporarily elevate noise levels, increase dust, and increase human disturbance into the immediately adjacent habitats; however, the surrounding habitats also do not support federal wetlands or federally listed species and thus the potential direct impacts during construction would not be significant.

Potential indirect impacts such as an increase in noise and artificial lighting from the clinic building and parking lot that may spill into the adjacent offsite habitats may occur from the operation of the proposed health clinic development; however, these potential impacts are not significant, because the surrounding habitats also do not support federal wetlands or federally listed species.

Wildlife

Due to the disturbed nature of the area, few wildlife species would be impacted by the Proposed Action. Impacts to wildlife would not be significant.

Federally Threatened and Endangered Listed Species

No federally listed animal or plant species occur or are expected to occur onsite based on a lack of suitable habitat, conditions, and/or known records in project BSA or vicinity and thus no federally listed animal or plant species would be impacted or adversely affected by the Proposed Action.

Similarly, no federally designated or proposed critical habitat for any federally listed species occurs within or directly adjacent to the project BSA and thus no critical habitat would be affected by the Proposed Action.

Wildlife Corridors

The project action area does not support a regional or local wildlife movement corridor and thus no wildlife corridors would be impacted by the Proposed Action.

Impacts Under the Federal Migratory Bird Treaty Act

The project action area has the potential to be utilized by a limited amount of nesting regionally common migratory birds that are protected under the federal MBTA. Due to the lack of vegetation and specifically larger trees, the Project site does not support potentially suitable nesting raptor habitat.

The Proposed Action could result in impacts to active bird nests for a limited amount of common species such as mourning dove or killdeer that may nest on the ground within the Project site if construction-related activities were to occur during the avian breeding season (February 1 to September 15). No suitable raptor habitat (i.e., trees) occurs within the Project site and thus no raptor species would be impacted.

Minor, adverse and temporary impacts to active birds' nests would be avoided or minimized with implementation of Mitigation Measure BIO-1.

3.4.3.2 No Action Alternative

Biological Resources

Under the No Action Alternative, the Cahuilla Indian Health Clinic Replacement Project would not be constructed. The Project site would continue in its present use or could be developed with other allowable uses. The current vegetation and wildlife conditions would continue as they are. There would be no disturbance to the Project site and no biological resources would be impacted. Similarly, the No Action Alternative would not contribute to the introduction, continued existence or spread of invasive animal species. Health care services would continue to be provided at the existing clinic location.

3.4.4. Mitigation Measure

Mitigation Measure BIO-1: Conduct Pre-Construction Surveys for Migratory Birds

- To avoid any direct impacts to migratory birds protected under the federal Migratory Bird Treaty Act and California Fish and Game Code Sections 3503 and 3513, respectively, removal of habitat that supports active nests in the proposed area of disturbance shall occur outside of the general breeding season for most bird species (February 15th to August 31st). If construction activities are to take place between February 15th and August 31st, a pre-construction survey shall be conducted by a qualified biologist within 14 days of construction to identify any active migratory bird nests protected under MBTA. The Pre-Construction Survey will be conducted within the Project site and include all areas where substantial ground disturbance or vegetation clearing is required.
- If no active nests are found, construction-related activities may proceed without further studies or mitigative actions.
- If occupied nests are present, an appropriate nest exclusion zone will be established and an appropriate buffer area around the nest shall be established and maintained until the juvenile birds have fledged.
- To the extent practicable, no project vehicles, chain saws, or heavy equipment will be operated in this exclusion zone until the biologist has determined that the nest is no longer active and or the young have fledged. If it is not practicable to avoid work in an exclusion zone around an active nest, work activities will be modified to minimize disturbance of nesting birds but may proceed in these zones at the discretion of the biologist. The biologist shall monitor all work activities in these zones daily when construction is occurring and assess their effect on the nesting birds. If the biologist determines that particular activities pose a high risk of disturbing an active nest, the biologist shall recommend additional, feasible measures to minimize the risk of nest disturbance. If work cannot proceed without disturbing the nesting birds, or signs of disturbance are observed by the monitor, work may need to be halted or redirected to other areas until the nesting and fledging is completed or the nest has otherwise failed for non-construction-related reasons. The biologist shall conduct periodic biological monitoring where needed and adjust buffers as appropriate.

The results of the pre-construction survey shall be reviewed and approved by the BIA prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan shall be prepared and include proposed measures to be implemented to ensure that disturbance of breeding activities is avoided.

3.5. Cultural Resources and Paleontological Resources

The following describes the existing cultural and paleontological resources conditions that occur within the Project site and general vicinity.

The term “historic properties” refers to a wide array of resources that includes prehistoric or historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in the National Register of Historic Places (NRHP).

3.5.1. Affected Environment

The Area of Potential Effects (APE) for direct impacts resulting from the Proposed Action includes all areas of potential ground disturbing activities. The horizontal APE is a 4-acre (1.61874 ha) portion of APN 572-190-004. The vertical APE will extend up to 5-feet below ground surface for site preparation activities and installation of the utilities, including the proposed septic system and retention basin.

No known paleontological resources are documented in the project footprint. The paleontological sensitivity of lands with Riverside County is shown on Figure 4.9.3 of the Riverside County General Plan Environmental Impact Report (EIR) (EIR Report No. 521, February 2015). The Project site is identified as having a “low” paleontological sensitivity (Riverside County, 2015b).

3.5.2. Regulatory Framework

According to 36 CFR 60.4 - Criteria for Evaluation, a historic resource is listed or considered eligible for listing on the NRHP if it meets one of the following criteria:

- Criterion A:** the resource is associated with events that have made a contribution to the broad pattern of our history;
- Criterion B:** the resource is associated with the lives of people significant in our past;
- Criterion C:** the resource embodies the distinct characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction; or
- Criterion D:** the resource has yielded, or is likely to yield, information important in prehistory or history.

Recommendations for site NRHP eligibility are presented in reports and site recordation forms. A site determined to be eligible for the NRHP is a site that would need to be mitigated if adversely affected by an undertaking⁽⁴⁾. Cultural resources found to be “ineligible” for the NRHP are not, by definition, Historic Properties and would not require further consideration if affected by the

⁴ Undertaking means a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license or approval (36 CFR 800.16).

undertaking. Eligibility determinations are made by the federal lead agency and reviewed by the appropriate SHPO or THPO for concurrence. Comparatively few sites are formally nominated due to the NRHP to the lengthy and labor-intensive nomination process. Typically, if a site is evaluated by the cultural resources consultant and determined by the lead federal agency to meet the eligibility criteria, and if the SHPO/THPO concurs with this determination, the site will be avoided, or impacts mitigated without going through the nomination process.

According to 36 CFR§ 800.5, a proposed action would have an adverse effect on a historic property if it would directly or indirectly alter any of the characteristics that renders it eligible for inclusion in the NRHP. Adverse effects include:

- Physical destruction of or damage to all or part of the property;
- Alteration of a resource, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary of Interior's Standards and Guidelines for the Treatment of Historic Properties (36 CFR§ 68);
- Removal of the property from its historic location;
- Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
- Introduction of visual, atmospheric, or audible elements that diminish the integrity of the resource's significant historic characteristics;
- Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a resource of religious and cultural significance to an Indian Tribe; and,
- Transfer, lease, or sale of the resource out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the resource's historic significance.

Tribal Historic Preservation Office, Cahuilla Band of Indians Department

Pursuant to the National Historic Preservation Act (54 U.S.C. 300101 et seq.), Preservation of Historic and Archaeological Data Act (P.L. 93-291), Executive Order 11593, and Protection and Enhancement of the Cultural Environment (36 CFR Part 800 or 801 as amended) federal agencies and Indian tribes are to identify and take into account the adverse effect their proposed project may have on the historic and prehistoric resources in the Area of Potential Effect (APE).

The Cahuilla Cultural Department and the Tribal Historic Preservation Office (THPO) was established in July of 2015. The purpose of the department is to preserve and protect traditional lands, sacred sites, including landscapes and culturally related practices throughout Cahuilla's aboriginal territory. The Cultural Department on behalf of the Tribe carries on consultation with

agencies and developers as prescribed by cultural preservation laws and carries out a cultural monitoring program where cultural monitors work alongside federal, State, County, City agencies in order to ensure the preservation of Cahuilla's cultural resources. The cultural monitor plays a vital role in preserving culturally sensitive areas by working together with said entities before and during construction and development on traditional lands. For projects on the Reservation, THPO is the lead agency for consultation purposes pursuant to 36 CFR Part 800.

Archival and Field Investigations

Cogstone prepared the Cultural Resources Assessment Report for the Cahuilla Health Clinic Replacement Project to document existing conditions and identify potential impacts (Appendix E-1, Cogstone, 2019). A records search was conducted at the Eastern Information Center (EIC) of the California Historical Resources Information System (CHRIS), which encompassed the APE and a one-mile radius around it.

Results of the record search indicate that only one previous study has been completed within the APE while an additional three studies have been completed previously within a one-mile radius. Additionally, the records search indicated no cultural resources have been identified within the APE. A total of seven cultural resources were previously recorded within a one-mile radius of the APE. Of these, one is located within 0.25 miles of the APE, one is located within 0.25 to 0.5 miles of the APE, and five are located within 0.5 to one-mile of the APE.

NAHC Correspondence

In June 2019, Cogstone requested the Native American Heritage Commission (NAHC) conduct a search of the Sacred Lands File (SLF) and provide a list of Native American contacts that may have additional information or concerns regarding the proposed replacement clinic. The response letter from NAHC indicated that a search of the SLF returned negative results. The list of tribal contacts provided included Temet Aguilar, Pauma Band of Luiseno Indians; Paul Macarro, Pechanga Band of Luiseno Indians; Mark Macarro, Pechanga Band of Luiseno Indians; John Gomez, Ramona Band of Cahuilla; Joseph Hamilton, Ramona Band of Cahuilla; Jim McPherson, Rincon Band of Luiseno Indians; Bo Mazzetti, Rincon Band of Luiseno Indians; San Luis Rey Tribal Council, San Luis Rey Band of Mission Indians; San Luis Rey Band of Mission Indians; Steven Estrada, Santa Rosa Band of Cahuilla Indians; Mercedes Estrada, Santa Rosa Band of Cahuilla Indians; Scott Cozart, Soboba Band of Luiseno Indians; Joseph Ontiveros, Soboba Band of Luiseno Indians; and Michael Mirelez, Torres-Martinez Desert Cahuilla Indians. A copy of this information is provided in Appendix E-1.

Archaeological Survey

An archaeological survey of the project APE was conducted on July 24, 2019 by Cogstone Archaeologist, Dr. John Gust, Ph.D. Native American Monitor, Danny Lee Esparza, of the

Cahuilla Band of Mission Indians, was also present during the survey. The entire four-acre APE was surveyed using transects spaced 15 meters apart. Ground visibility was poor (0-5%) within the majority of the APE due to vegetation. Within the area of the proposed retention pond (nearly 100%). In areas with vegetation, the dry brush was pushed aside every 15 to 20 meters to expose the bare ground. The Tribe had previously granted permission for excess fill to be dumped and spread within the APE (Appendix E-1). This fill contained a large amount of modern trash debris especially plastic. The Tribe has had a number of workdays aimed at cleaning up the debris, but a large amount is still present.

The survey was negative for prehistoric or historic cultural resources. Two small fragments of potentially historic white earthenware tiles were identified during the survey, however, their close proximity to the modern refuse within the APE suggests that these were imported with the fill and not in context. Given this association, they were not recorded.

Tribal Consultation and Coordination

Branches of the Federal Government are required to consult with Native American tribes for federal undertakings that may affect historic properties for which they attach religious and cultural significance. This requirement is stipulated under the National Historic Preservation Act at 36 CFR Part 800.2(c)(2)(ii) and the following Executive Orders:

- **Executive Memorandum, Government-to-Government Relationship with Tribal Governments (2004):** Recommitted the federal government to work with federally recognized Native American tribal governments and to respect and support tribal sovereignty.
- **Executive Order 13175 Consultation and Coordination with Indian Tribal Governments (2000):** Recognizes the right for tribal self-government and sovereignty. It also committed the federal government to work with tribal governments on a government-to-government basis.
- **Executive Order 13007 Indian Sacred Sites (1996):** Directs federal agencies to accommodate access to and ceremonial use of Native American sacred sites by the Native American communities, and to avoid adversely affecting the physical integrity of sacred sites.
- Executive Order 12898 Federal Actions to Address Environmental Justice in Minority populations and Low-Income Populations (1994): Section 6-606, “Native American Programs” requires that federal agencies responsibilities apply equally to Native American programs.
- **Memorandum, Government-to-Government Relations with Native American Tribal Governments (1994):** Establishes that the head of each agency is responsible for ensuring that that agency or department conducts government-to-government

consultation prior to taking actions that may affect federally recognized tribal governments, and that consultations are to be open and candid so that the interested parties may evaluate for themselves the potential impact of the action.

Section 106 of the National Historic Preservation Act also requires that federal agencies consult with the THPO regarding the efforts taken to identify and mitigate impacts to cultural resources. A letter of consultation was submitted to the Tribal Council and the THPO on August 4, 2020 (Appendix E-2) requesting concurrence with the APE delineation and Finding of Effect. The THPO sent a letter dated August 11, 2020 concurring with the determination that the proposed action would result in No Effects/No Adverse Effects on Historical Properties (Appendix E-3) thus completing Section 106 consultation.

Paleontological Resources

The Project Area is located in a region with low paleontological sensitivity and construction associated with the Project is not anticipated to result in significant adverse effects to paleontological resources. It is not expected that potential paleontological resources would be disturbed.

3.5.3. Environmental Consequences

Proposed Action

No cultural resources have been previously recorded in the APE or within a half-mile of the APE, nor were any identified during the pedestrian survey. However, the potential for discovery of unknown intact archaeological deposits, resources, or features is deemed to be moderate for the following reasons:

- The lack of prior development within the APE;
- The placement of fill material to an unknown depth over the APE;
- The inability to observe cultural resources on the ground surface due to dense vegetation; and,
- The maximum depth of excavation (five feet below ground surface).

Therefore, in order to avoid impacts to unknown subsurface historic properties, it is recommended that archaeological and Native American monitoring be conducted during all ground-disturbing activities associated with proposed construction. A permit for archaeological investigations, in accordance with the Archaeological Resources Protection Act of 1979 (ARPA), will be obtained from the BIA for the construction monitoring efforts.

Implementation of Mitigation Measure CR-1 (Cultural Resource Monitoring) would reduce the possibility of adverse effects to historic properties. Therefore, construction of the Cahuilla Indian Health Clinic Replacement Project would result in no adverse effects on historic properties.

No Action Alternative

Under the No Action Alternative, the Cahuilla Indian Health Clinic Replacement Project would not be constructed. The Project site would continue in its present use or could be developed with other allowable uses. No ground disturbance, grading and construction activities associated with the replacement health clinic would occur; therefore, there would be no effects on historic properties and paleontological resources. Health care services would continue to be provided at the existing clinic location.

3.5.4. Mitigation Measure CR-1 (Cultural Resource Monitoring)

Full-time cultural resources monitoring by both a professionally qualified archaeologist meeting the Secretary of the Interiors Standards and a Tribal Monitor would be conducted during all ground-disturbing activities associated with the construction of the Proposed Project.

In the event of an unanticipated discovery, all work would be suspended within 50 feet of the find and directed to other project areas until a professionally qualified archaeologist meeting the Secretary of the Interiors Standards and the Tribe's Tribal Historic Preservation Office (THPO) evaluate its significance pursuant to 36 CFR Part 800.13(b) for Post Review Discoveries. If cultural objects are identified by the Tribe's THPO as funerary objects, sacred objects, or objects of cultural patrimony, compliance with the Native American Grave Protection and Repatriation Act (NAGPRA), Section 3(d), and implementing regulations 43 CFR Part 10, S10.4 would be initiated.

In the unlikely event that human remains are encountered during construction, all work would be suspended within 50 feet of the remains and the BIA and Tribe's THPO would take steps to determine whether the burial remains are of Native American or non-Native American origin. The BIA would seek the advice and other services of the County Coroner. Work would remain diverted while the BIA and Tribe's THPO determine whether the remains are Native American and for any subsequent treatment. Protection of human burials while awaiting BIA and the Tribe's determination would include keeping the discovery confidential and securing the discovery location to prevent disturbance of the remains and associated materials. If the Riverside County Coroner, in cooperation with the BIA and the Tribe, determines that the remains are most likely of Native American origin, compliance of NAGPRA, Section 3(d), and implementing regulations 43 CFR Part 10, S10.4 would be initiated.

If the Riverside County Coroner, in cooperation with the BIA and the Tribe's THPO, determine the remains represent a historic non-Native American burial, the BIA and the Tribe's THPO would consult with the SHPO regarding their proposed treatment of these remains.

A report documenting the monitoring efforts shall be provided to BIA and the THPO within 30 days of the completion of ground disturbing activities.

3.6. Socioeconomic Conditions

3.6.1. Affected Environment

Demographic and Economic Characteristics

The Project site is located in an unincorporated, and rural portion of Riverside County. The nearest population centers to the Project site are the cities of Hemet, approximately 19 miles (30.6 km) to the north, and La Quinta, 27.7 miles (47.7 km) north east.

Table 3.6-1 shows 2000, 2010 and 2017 population estimates for the Cahuilla Reservation, unincorporated areas of Riverside County, Riverside County as a whole, and for the state of California. Over the 17-year period from 2000 to 2017, population on the Reservation and within unincorporated areas of Riverside County declined at rates of 1.2 percent and 11.6 percent per year, respectively. Over the same period, population growth within Riverside County as a whole grew at a rate of 2.1 percent per year and population within the State grew at a rate of 0.8 percent per year.

Table 3.6-1. Regional Population, 2000 to 2017

Location	2000	2010	2017	Net Change	Trend ⁽¹⁾
Cahuilla Reservation (a) (b) (c)	168 (a)	124 (b)	133 (c)	(35)	-1.2%
Unincorporated Riverside County (d) (e) (f)	1,124,666	504,392	379,252	(745,414)	-11.6%
Riverside County (d) (e) (f)	1,545,387	2,189,641	2,382,640	837,253	2.1%
California (d) (e) (f)	33,873,086	37,253,956	38,982,847	5,109,761	0.8%

Note:

(1) Denotes change per year

Source:

- (a) U.S. Census Bureau, Total Population, Census 2000 Summary File 3 (SF3), (US Census Bureau, 2000).
- (b) U.S. Census Bureau, Historic City, County and State Population Estimates, 1990-2000, with 1990 and 2000 Census Counts (US Census Bureau, 2001.)
- (c) California, 2018a. State of California, Department of Finance, E-4 Population Estimates for Cities, Counties, and the State, 2001-2010, with 2000 & 2010 Census Counts. Sacramento, California, November 2012
- (d) California, 2018b. State of California Dept. of Finance, E-4 Population Estimates for Cities, Counties, and the State 2011 – 2018
- (e) U.S. Census Bureau, 2006-2010 American Community Survey (US Census Bureau 2010).
- (f) U.S. Census Bureau, 2013-2017 American Community Survey (US Census Bureau 2017).

A comparison of the ethnic makeup of the Reservation, Riverside County and the State of California in 2017/2018 is presented on Table 3.6-2. For the purposes of this analysis, a minority population consists of any geographic area in which minority representation is greater than the national average of 23.4 percent (U.S. Census Bureau, 2018). Minorities include individuals

classified by the U.S. Census Bureau as Black or African American, American Indian and Alaska Native, Asian, Native Hawaiian and other Pacific Islander, Hispanic or Latino, and those classified under “two or more races.” Hispanics may be of any race and are excluded from the totals for individual races to avoid double counting.

As shown on Table 3.6-2, ethnic minorities make up 48 percent of the Reservation’s population. The ethnic makeup of Riverside County was 62 percent White and 38 percent minority. Although the population of Riverside County is predominantly white, it reflects a similar level of diversity, when compared to the State of California and the US as a whole.

Table 3.6-2. Population By Race

Population by Race	Cahuilla Band Reservation ⁽¹⁾		Riverside County ⁽¹⁾		California ⁽¹⁾		United States ⁽¹⁾	
	Persons	%	Persons	%	Persons	%	Persons	%
White	69	52%	1,450,473	62%	23,607,242	61%	235,507,457	72%
Black/African American	0	0 %	148,960	6%	2,263,222	6%	41,393,491	13%
American Indian/Alaskan Native	51	38%	19,865	> 1%	292,018	> 1%	2,726,278	1%
Asian	8	6%	148,213	6%	5,503,672	14%	18,215,328	6%
Native Hawaiian/Pacific Islander	0	0%	6,863	> 1%	152,027	> 1%	608,219	0%
Some Other Race (Hispanic)	0	0%	474,855	20%	5,329,952	14%	16,552,940	5%
2+ Races	5	4%	105,773	4%	1,834,714	5%	21,430,930	7%
TOTAL PERSONS	133	100%	2,355,002	100%	38,982,847	100%	326,434,643	100%
TOTAL MINORITY	64	48%	904,529	38%	15,375,605	39%	100,927,186	30%

Source: (1) US Census Bureau 2017.

The US Census Bureau reported that Riverside County had a 2017 population of 2,355,000. The US Census Bureau reported a total population on the Reservation was estimated at 133 persons. Of this total, 90 percent of the population is over the age of 16; 55 percent are working in civilian jobs; and 35 percent are not in the labor force. Approximately 3.6 percent of families on the Reservation are below the poverty level, compared to 12.0 percent of families in Riverside County and 11.1 percent state-wide.

The census data did not identify median household income for persons residing on the Cahuilla Reservation. However, the Riverside County’s Strategic Health Alliance reported a median household income of \$61,994 for Riverside County, and \$71,805 for the state of California.

Environmental Justice

Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, requires Federal agencies to identify and address disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations in the United States. Because, as shown on Table 3.6-2, the Cahuilla Reservation has a higher minority population than the national average, it is considered to be an environmental justice community.

3.6.2. Environmental Consequences

Proposed Action

Economic Impacts

Approximately 40 workers would be required for construction of the replacement health clinic. Construction contractors will be encouraged to give Tribal members living within or near the boundaries of the Cahuilla Reservation preference in employment. The RSBCIHI is further encouraged to select Indian-owned companies for contracts and employ tribal members to the maximum extent possible. Benefits to the local economy would be seen through increased wages, overhead expenses, materials costs, and profit. Local commercial and service entities in the community could expect to see some short-term, minor increase in activity related to expenditures by workers that are not from the area. Construction employment would be limited and temporary and does not represent a permanent change in local employment.

Currently, the Cahuilla/Santa Rosa Indian Health Clinic is staffed with 15 full-time employees with five (5) additional staff that rotate on-site weekly or twice monthly. No appreciable increase in staffing above current levels is anticipated. Over the next 5 years, it is anticipated that 2 to 3 new staff persons would be added annually; for a total of 10 to 15 new employees. This increase would not be appreciable and overall, the impact on the local economy would be minor, beneficial and temporary.

Social Impacts

The provision of a replacement health clinic would be beneficial toward improving the health and environment of eligible Native Americans and their families living in Riverside or San Bernardino counties which would enhance the long-term social vitality of these areas.

Environmental Justice

Although the Cahuilla Reservation is considered to be an environmental justice community, no disproportionately high and adverse “human health impacts” are anticipated as a result of construction or operational of the Proposed Project.

In terms of adverse “environmental impacts”, construction of the Proposed Project would subject neighboring properties to increased construction-related air quality emissions and noise levels. Section 3.3.2 (Air Quality) found that the construction emissions would be far below SCAQMD’s significance thresholds, such that adverse air quality impacts would be temporary and minor. No mitigation would be required.

As described in Section 3.8 (Noise), construction of the health care facility could result in temporary noise levels that would not exceed 55 dBA at the nearest sensitive receptor. The “noisiest” construction equipment would result in exterior noise levels of approximately 47 dBA, which is below the EPA’s compatibility guideline of 55 dBA. No mitigation would be required.

No Action Alternative

Under the No Action alternative, the Cahuilla Indian Health Clinic Replacement Project would not be constructed. The Project site would continue in its present and health care services would continue to be provided at the existing clinic location. Therefore, no new construction-related employment opportunities would be created. No additional wages or benefits would be generated or spent in the local economy and no beneficial social impacts from improving the health of eligible Native Americans and their families would be realized.

3.7. Important Farmlands

3.7.1. Affected Environment

3.7.1.1 Farmland Protection Policy Act

Congress passed the Farmland Protection Policy Act (FPPA) in 1981 in response to a substantial decrease in the amount of open farmland (7 United States Code [U.S.C.] 4201 et seq.). Under the FPPA, the Secretary of Agriculture established criteria for use by federal agencies to consider effects to farmland. As stipulated by the FPPA, federal agencies are to: (1) use the criteria to identify and account for the adverse effects of their programs on the preservation of farmland; (2) consider alternative actions, as appropriate, that could lessen adverse effects; and (3) ensure that their programs, to the extent practicable, are compatible with state, units of local government, and private programs and policies to protect farmland (7 U.S.C. 658.1).

The FPPA applies to projects that would irreversibly convert farmland (directly or indirectly) to non-agricultural use and are completed by a federal agency or with assistance from a federal agency. Assistance includes the provision of financing or loans.

Federal agencies comply with the FPPA by completing a Farmland Conversion Impact Rating Form (Form AD-1006) for submittal to the United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS).

Farmland that is subject to the FPPA is:

Prime Farmland: Land that has the best combination of physical and chemical characteristics for producing food, feed, fiber, forage, oilseed, and other agricultural crops with minimum inputs of fuel, fertilizer, pesticides, and labor, and without intolerable soil erosion.

Unique Farmland: Land other than prime farmland that is used for production of specific high-value food and fiber crops, as determined by the Secretary of Agriculture. It has the special combination of soil quality, location, growing season, and moisture supply needed to economically produce sustained high quality or high yields of specific crops when treated and managed according to acceptable farming methods.

Farmland of Statewide or Local Importance: Farmland, other than prime or unique farmland, that is of statewide or local importance for the production of food, feed, fiber, forage, or oilseed crops

3.7.1.2 Farmland Mapping and Monitoring Program

Conservation of agricultural land in California is monitored on the state level through the Department of Conservation's Division of Land Resource Protection, and specifically through the Farmland Mapping and Monitoring Program (FMMP) and the California Land Conservation Act of 1965, commonly referred to as the Williamson Act.

The FMMP uses NRCS soils surveys and existing land use observations to determine the nature and quality of farmland in 10-acre-minimum units across the state. The NRCS's definition of

Prime Farmland and Farmland of Statewide Importance is similar to that in the FPPA with one exception—the NRCS' definition of Prime Farmland includes the availability of water. In general, Prime Farmland is defined as having an adequate and dependable water supply from precipitation or irrigation, a favorable temperature and growing season, an acceptable level of acidity or alkalinity, an acceptable content of salt or sodium, and few or no rocks (NRCS 2018). As described in 7 CFR Part 622.3, the term “Prime Farmland if Irrigated” refers to land with the soil characteristics to qualify as Prime Farmland but which lacks the irrigation or water supply necessary to qualify as Prime Farmland (NRCS 2018). As shown on **Figure 3.7-1**, the FMMP designates the Project site as “Farmland of Local Importance”.

NRSC Soil Types

The soils on the Project site have been mapped by the NRCS and the majority is mapped as “MsC – Mottsville sandy loam, 2 to 8 percent slopes” (NRCS, 2019). It has a farmland classification of “prime farmland, if irrigated.” The remaining portion of the Project site is mapped as “BsD2 – Bull Trail sandy loam, 8 to 15 percent slopes”. It has a farmland classification of “not prime farmland”.

3.7.2. Environmental Consequences

Proposed Action

The Project site consists of vegetated land that is vacant of development. In compliance with the FPPA a Farmland Conversion Impact Rating Form AD-1006 (Appendix E) was prepared which considered the amount of prime farmland on the Project site compared to the amount of important farmland in the area and in the County; the impact converting the site’s farmland would have on local farm support services and continuance of local farms; and the compatibility of the Proposed Project with agricultural use. No further studies are necessary as the score is below the 160 points that would trigger further analysis.

No Action Alternative

Under the No Action alternative, the Cahuilla Indian Health Clinic Replacement Project would not be constructed, and no impacts farmlands would occur. The Project site would continue in its present use or could be developed with other allowable uses. Health care services would continue to be provided at the existing clinic location.

3.8. Noise

Noise Definitions and Overview of Sound Measurement

Noise is defined as unwanted sound. The degree to which noise disturbs others can be subjective and depends upon its intensity. The loudness of a sound is measured in units called decibels (dB). “A-weighted” decibel (dB(A)) measurements are used to characterize sound levels that can be sensed by the human ear. “A-weighted” denotes the adjustment of the frequency content of a noise event to represent the way in which the average human ear responds to the noise event. The EPA identifies 24-hour exposure levels in excess of 45 dBA indoors and 55 dBA outdoors as interfering with activities and causing annoyance (US EPA, 1974). Levels below these noise thresholds permit spoken conversation and other activities such as sleeping, working, and recreation.

The County of Riverside has General Noise Regulations at Chapter 7.35.010 and 7.35.020 of the Code of Ordinances (Code) which indicate construction and other reasonable noise activity is acceptable during the hours of 7:00 AM to 7:00 PM on weekdays (County of Riverside, 2018a). Additionally, Nuisance Exterior Sound Level Limits, contained in Chapter 7.25.010 of the Code, makes it unlawful for any person to cause or allow the creation of any exterior noise level, measures at the property line of a residential use to exceed 55 dBA during the day (7:00 AM to 10:00 PM) and 45 dBA at night (10:00 PM to 7:00 AM) (County of Riverside, 2018b).

Although the County’s Noise Regulations do not apply on Reservation lands, both the EPA and the County’s noise exposure limits are considered in the assessment of potential noise effects.

Noise levels typically attenuate (or drop off) at a rate of 6 dBA per doubling of distance from the source. Noise from lightly traveled roads typically attenuates at a rate of about 4.5 dBA per doubling of distance. Noise from heavily traveled roads typically attenuates at about 3 dBA per doubling of distance. Noise levels may also be reduced by intervening structures; generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA.

In addition to the actual instantaneous measurement of sound levels, the duration of sound is important since sounds that occur over a long period of time are more likely to be an annoyance or cause direct physical damage or environmental stress. One of the most frequently used noise metrics that considers both duration and sound power level is the equivalent noise level (Leq). The Leq is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time (essentially, the average noise level). Typically, Leq is summed over a one-hour period. Maximum Sound Pressure Level (Lmax) is the highest root mean squared (RMS) sound pressure level within the measuring period, and Minimum Sound Pressure Level (Lmin) is the lowest RMS sound pressure level within the measuring period.

3.8.1. Affected Environment

Sensitive Receptors

Sensitive receptors are facilities that house or attract children, the elderly, and people with illnesses or others who are especially sensitive to the effects of noise. Hospitals, schools, convalescent facilities, and residential areas are examples of sensitive receptors. The nearest sensitive receptors are residences located approximately 3,000 feet west of the Project site.

Existing Noise Sources

The Project site is in a rural setting, with only sparse residential development in the immediate area. Although there are no figures for ambient sound levels in the area, noise levels associated with neighboring activities and traffic in the vicinity of the Project site can be assumed to be low.

3.8.2. Environmental Consequences

Proposed Action

Operational Noise

Operation of the replacement health clinic is anticipated to have a negligible impact on noise levels. The hours of operation would be 8:00 AM to 5:00 PM Monday through Thursday, and 8:00 AM to 2:00 PM on Fridays. Additionally, the new health clinic would be set back from Cahuilla Road (State Route 371), and vehicle noise associated with the new facility would only contribute an insignificant amount over the background levels of traffic noise that exists in the area. No mitigation would be required.

Construction Noise

The main sources of short-term noise impacts during construction activities would include heavy machinery used during site preparation at the Project site, as well as equipment used for construction. Table 3.8-1 shows the typical noise levels associated with heavy construction equipment. As shown, average noise levels at construction sites can range from about 75 to 89 dBA at 50 feet from the source, depending upon the types of equipment in operation at any given time and phase of construction.

TABLE 3.8-1. TYPICAL CONSTRUCTION EQUIPMENT NOISE

Equipment Onsite	Typical Level (dBA) 25 Feet from the Source	Typical Level (dBA) 50 Feet from the Source	Typical Level (dBA) 100 Feet from the Source	Typical Level (dBA) 3,200 Feet from the Source
Air Compressor	84	78	64	34
Backhoe	84	78	64	34

TABLE 3.8-1. TYPICAL CONSTRUCTION EQUIPMENT NOISE

Equipment Onsite	Typical Level (dBA) 25 Feet from the Source	Typical Level (dBA) 50 Feet from the Source	Typical Level (dBA) 100 Feet from the Source	Typical Level (dBA) 3,200 Feet from the Source
Bobcat Tractor	84	78	64	34
Concrete Mixer	85	79	73	43
Bulldozer	88	82	76	46
Jack Hammer	95	89	83	53
Pavement Roller	86	80	74	44
Street Sweeper	88	82	76	46
Man Lift	81	75	69	39
Dump Truck	82	76	70	40

Construction noise is considered a point source and would attenuate at approximately 6 dBA for every doubling of distance. Given that the nearest sensitive receptors area located approximately 3000 feet west of the Project site, a jackhammer with a noise level of 89 dBA at 50 feet from the source would emit a noise level of approximately 53 dBA at the closest sensitive receptor. Therefore, the operation of the “noisiest” construction equipment would result in exterior noise levels that would be below the EPA’s and the County’s compatibility guidelines of 55 dBA. No mitigation would be required.

No Action Alternative

Under the No Action alternative, the replacement health care facility would not be built at the Project site, and there would be no associated noise from new construction or operation. Health care services would continue to be provided at the existing clinic location.

3.9. Transportation

3.9.1. Affected Environment

Regional access to the Project site is provided by Interstate 15 (I-15) and State Route 79 (SR-79) on the west or by State Route 74 (SR-74), State 111 (SR-111) or State Route 86 (SR-86) on the west. SR-79 and SR-74 are the nearest north/south routes and are located approximately 9 miles (14.5 km) west and 10.5 miles (16.9 km) east of the Project site, respectively. Local access to the Project site is provided by State Route 371 (SR-371). SR-371 is a two-lane undivided conventional highway that connects San Diego County and Riverside Counties. The total length of SR-371 is 20.8 miles (33.5 km) beginning in the community of Aguanga at its junction with State Route 79 (SR-79) near the Riverside-San Diego County Line. It traverses the communities of Riverside

Lake, Anza, and the Cahuilla Indian Reservation ending at its junction with State Route 74 (SR-74) near the Riverside-San Diego County Line (CALTRANS, 2016).

Bicycle access is permitted along the entirety of SR-371. However, there are no designated bicycle facilities along the route. Cyclists must ride along the shoulder or can utilize the full lane as they see fit. While pedestrian access is permitted along the entire route, none of the segments have sidewalks and therefore pedestrians are expected to walk along the shoulder. The route traverses rural, mountainous terrain where pedestrian activity is minimal (CALTRANS, 2016).

There are no transit facilities or transit services along SR-371 and no freight or generators along this route. Given that the route traverses rural, mountainous terrain, this is to be expected since there is not a dense enough customer base to support public transit services along the route.

According to the California Department of Transportation's (Caltrans) *Transportation Concept Report for State Route 371* (June 2016), traffic volumes are anticipated to increase in the future, however, additional capacity is not needed to maintain an acceptable Level of Service of "D", under 2035 Build Out Conditions (CALTRANS, 2016). No capacity increase or major operational projects are proposed for SR-371.

3.9.2. Environmental Consequences

Proposed Action

The trip generation for the Proposed Action was calculated using trip rates from the Institute of Transportation Engineers (ITE) 10th Edition *Trip Generation Manual* (ITE, 2017). After applying a "credit" for trips generated by the existing health clinic, the replacement health clinic is estimated to generate an additional 267 average daily trips (ADT), with 23 of those trips occurring during the PM peak hour (**Table 3.9-1**).

Table 3.9-1. Project Trip Generation

ITE No.	Proposed Use	Daily Rate (a)	Size	ADT	PM Peak Hour Rate (a)	PM Peak Hour Trips
720	Replacement Health Clinic	38.16	11,600 SF	443	3.28	38
720	Credit for Existing Clinic	38.16	(4,600 SF)	-176	3.28	-15
NET INCREASE			7,000	267		23

Notes:

- (a) Rate based on trips per 1,000 SF
(b) ADT = Average Daily Trips

Source: ITE, 2017.

The Proposed Project includes a new driveway entrance to the replacement clinic, approximately 52 feet in width from SR-371. The driveway would include two 12' ingress lanes, two 12' egress

lands and a 6' median. Potential impacts on local transportation and circulation patterns on SR-371 would be minimal.

No Action Alternative

Under the No Action Alternative, the Cahuilla Indian Health Clinic Replacement Project would not be constructed, and no transportation impacts would result. The Project site would continue in its present use or could be developed with other allowable uses. Health care services would continue to be provided at the existing clinic location.

3.10. Resource Use Patterns

3.10.1. Environmental Consequences

Proposed Action

Hunting, Fishing and Gathering

The Project site is not currently utilized for traditional gathering and hunting. Therefore, implementation of the Proposed Project is not anticipated to cause adverse effects to hunting, fishing, or gathering resources.

Timber Harvesting

The Project site does not contain merchantable timber stands. Therefore, no activity is proposed under this project are anticipated to cause significant impacts to commercial timber resources.

Agriculture

Commercial agriculture is not currently occurring on the Project site. As discussed in Section 3.7.1, the site is not considered prime, unique, or regionally important agricultural lands. Although the Reservation land is used almost exclusively for livestock grazing and forage production, such activities do not occur on the Project site. In addition, the Farmland Conversion Impact Rating Form AD-1006 (Appendix D) did not find the Proposed Project would have a significant effect on local farm support services or on the continuance of local farms in the area. The annual low growing vegetation present within the Reservation for traditional basketry material does not occur on the Project Site (BIA, 2018) and the project does not propose any agricultural land use activity. Therefore, there will be no anticipated significant impacts to agricultural resources from the Proposed Project either off or on the Reservation environment.

Mineral Extraction

Commercial mining is not a current land use activity within the project vicinity or on the Project site. Sources of quality borrow material (construction gravel and sand) are not known to occur in

the project vicinity and no activity proposed under this Project is anticipated to cause significant adverse effects to the surface mineral resources.

Recreation

Popular recreation facilities located in the vicinity of the Project site include the Cahuilla Creek Motocross, Anza Minor Park and the Cahuilla Casino at Mountain Sky. The Proposed Project would not affect existing, nor generate the need for new/expanded recreational facilities.

No Action Alternative

Under the No Action alternative, the Cahuilla Indian Health Clinic Replacement Project would not be constructed. The Project Site would continue in its present use or could be developed with other allowable uses. Resource use patterns would remain unchanged. No impacts related to resource use patterns would occur beyond existing conditions with the No Action Alternative.

3.11. Other Values

3.11.1. Affected Environment

Hazardous Materials

Solid waste generated from the existing Cahuilla/Santa Rosa Indian Health Clinic is subject to all applicable state and federal environmental protection laws governing waste. Burrtec, a local commercial refuse hauler, provides commercial refuse service to the project area. Garbage collection, cardboard, office paper, green waste, and mixed recycling are also available. In 2017, the County of Riverside' Countywide Integrated Waste Management Plan Annual report indicated that with projections of current and future disposal, it estimates landfills within the region have 20+ years of disposal capacity (County of Riverside, 2017).

Based upon review of the following data resources that provide information regarding the facilities or sites identified as meeting the “Cortese List” requirements the project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and is not located near known hazardous waste sites or non-contaminated permitted facilities including gas stations, underground storage tanks, or land disposal sites:

- List of Hazardous Waste and Substances sites from Department of Toxic Substances Control (DTSC) EnviroStor database
(https://www.envirostor.dtsc.ca.gov/public/search.asp?cmd=search&reporttype=CORTESE&site_type=CSITES,OPEN,FUDS,CLOSE&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST)

- List of Leaking Underground Storage Tank Sites by County and Fiscal Water Board Year from State Water Resource Control Boards GeoTracker database (<https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=66-375+Martinez+Road%2C+Thermal+California>)
- List of solid waste disposal sites identified by Water Board with waste constituents above hazardous waste levels outside the waste management unit (<https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CurrentList.pdf>)
- List of “active” Cease and Desist Orders and Cleanup and Abatement Orders from California State Water Board (<https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CDOCAOList.xlsx>)

No recognized environmental conditions have been identified within 1 mile of the Proposed Project site.

Medical Waste

Virtually every medical facility, including health clinics, generate medical wastes to one degree or another. Pursuant to the State of California’s Medical Waste Management Act of 2017 (Sections 117600-118360 of the California Health and Safety Code [HSC]), a “large quantity generator” is defined as a “medical waste generator, other than a trauma scene waste management practitioner, that generates 200 or more pounds of medical waste in any month.” Small-quantity generators fall under 200 pounds per month (California Department of Health, 2017).

Pursuant to HSC Section 117960, medical generators are required to file a “medical waste management plan” with the County of Riverside Department of Environmental Health (DEH). This plan serves to disclose the types and amounts of medical waste generated by a site; how the waste will be handled, stored or shipped; as well as specify the onsite waste treatment methods used to render the waste non-hazardous prior to disposal (if applicable), for example through steam sterilization, incineration, etc. The plan must also address the storage and disposal of sharps, biohazardous substances, radioactive waste, chemotherapeutics, human tissues, etc., as well as mixed wastes (containing both medical and non-medical waste types). The existing Cahuilla Santa Rosa Health Clinic has a Medical Waste Management Plan (MWMP) on file with DEH, which identifies the facility as a “small quantity generator”. Types of waste generated include laboratory wastes, blood or bodily fluids wastes, sharps waste and pharmaceutical wastes. The estimated quantity generated is 20 pounds per month. The MWMP describes the methods used in the handling, segregation, containment, and storage of medical wastes. It also identifies the labeling, containment, and disinfection procedures used, as well as the emergency action plan to be

implemented in the event of treatment system breakdowns, spills, etc. Hazardous waste is hauled, treated and disposed by Stericycle, Inc.

Community Infrastructure

Public Services and Utilities

Public Services provided in the project area include fire protection services, police protection, schools and public parks. The following information is taken from the Cahuilla Casino Expansion & Hotel Construction Tribal Environmental Impact Study (Cahuilla Band of Indians, 2018).

Fire Protection

The Riverside County Fire Department provides fire protection and emergency services in unincorporated Riverside County areas, including the Project site. The nearest fire station is Station 77 located approximately 1.54 miles (2.48 km) southwest of the Project site at 4161 Lakeshore Boulevard in the unincorporated town of Aguanga. The Project site is located within a 5-minute response time of this station.

Police Protection

The Riverside County Sheriff's Department provides law enforcement services in the project area. The police station nearest to the Project site is the Hemet Station located approximately 16.64 miles (26.79 km) to the northwest at 43950 Acacia Avenue. The drive time to the Reservation to respond to an emergency is approximately 23 minutes.

The Hemet Sheriff's department provides general patrol services as well as law enforcement investigative services to unincorporated areas of Riverside County and several Tribal communities. The California Highway Patrol provides traffic and law enforcement for this area and on public highways and roads leading to the Reservation.

Schools

The Hemet Unified School District provides public school services in the project area. The school nearest to the Project site is Hamilton High School located at 57430 Mitchell Road approximately 7.44 miles (11.97 km) northeast of the Project site. The nearest elementary and middle school to the Project site is Hamilton K-8 located at 57550 Mitchell Rd, Anza, CA 92539 approximately 7.59 miles (12.21 km) northeast of the Project site.

Public Parks

There are several recreational facilities that occur along SR-371 either on the Cahuilla Reservation or in the surrounding area. These facilities include: the Cahuilla Casino, Anza Minor Park and Cahuilla Creek Motocross. There are various outdoor activities prevalent in the area including

hiking and horseback riding. Cahuilla Creek Motocross is located approximately 1.54 km (.96 miles) northeast of the Project site and the Anza Minor Park is located 9.92 km (6.16 miles) northeast of the Project site.

No utility infrastructure is located on the Project site.

Visual Resources

The Project site is bordered on the north by SR 371, and by vacant land to the south, east, west, and north of SR 371. The Project site consists of disturbed grassy field with a substantial amount of vehicle track marks and is relatively flat. The project site is directly surrounded by similar disturbed vegetation. Public views of the Project site would consist of views from vehicles (or other modes of transportation) traveling along SR-371. The duration of public views of the Project site would be short due to the speed of travel along this road.

3.11.2. Environmental Consequences

Proposed Action

Hazardous Materials

Construction

The construction of the Proposed Project would generate construction debris waste, which would require proper disposal or reuse. The project site is vacant of structures and therefore, demolition activities are not required. Construction of the facility is estimated to take approximately six months, and would begin with site preparation, foundations, and utilities installation.

Any hazardous waste generated during construction (e.g. motor oil, cleaning chemicals, solvents, paints, glues, degreasers, and caulking compounds, etc.) would be collected in hazardous waste accumulation containers near the point of generation and moved daily to the general contractor's 90-day hazardous waste storage area located onsite. The accumulated waste would be transported by an authorized waste transporter to an off-site waste management facility authorized to accept the waste. Hazardous waste would be recycled or managed and disposed of properly in a licensed Class I waste disposal facility authorized to accept the waste.

Any non-hazardous construction debris that cannot be reused or recycled will be disposed of by Burrtec or another licensed solid waste hauler. The construction contractor would be responsible for ensuring that the waste material generated is properly disposed. Portable restrooms for employee use during the construction period would be provided and maintained by a private contractor.

Operations

Solid waste generated from operation activities would be disposed of by the City of Riverside CR&R or another licensed solid waste hauler. Hazardous waste would consist of flashlight batteries and fluorescent lamp bulbs, which can be recycled through a local recycling program.

The Cahuilla Santa Rosa Health Clinic has an existing Medical Waste Management Plan on file with the Riverside County DEH. This Plan would be updated and modified, as necessary to reflect operations at the replacement health clinic and provided to DEH for review and approval.

The overall impacts of hazardous materials and waste management from the Proposed Action would be localized and negligible.

Community Infrastructure

The replacement of the existing health clinic would not increase demand in resources or manpower from existing levels from both the Riverside County Sheriff's Department and Fire Department. Impacts to police and fire services resulting from the Proposed Project would be negligible.

Impacts to schools and public parks are related to project-related population increases. The Proposed Project would not result in a population increase in American Indian and Alaska Natives, but would improve the quality of health care services for this demographic. Therefore, impacts to schools and public parks would be negligible.

During construction of the replacement clinic, anticipated to last six (6) months, there would likely be negligible to minor impacts on utilities. Utilities required for the replacement health clinic include electricity; natural gas/propane; communications lines and cellular service; stormwater management; wastewater treatment and potable water. There is an electrical distribution line on the west side of SR 371. Verizon provides telephone services on the Cahuilla Reservation with telephone lines located along SR 371, adjacent to the Project site. Anza Electric Cooperative may need to extend existing service lines to the new facility and possibly upgrade their service. See Section 3.2 of this EA for a discussion of stormwater management, wastewater treatment and potable water utilities.

An increase in the demand for energy is anticipated for the replacement clinic, however, this increase would be negligible and would not create the need for new or for additional energy supplies or generation.

Visual Resources

Minor short-term and long-term visual impacts to travelers on SR-371 are anticipated during the construction and operation of the Project. The Proposed Project would introduce new visual elements of the health clinic as well as the associated hardscape and landscaping. However,

impacts resulting from the change in visual character of the Project site would be reduced by the proposed structures' architectural design and landscaping that would be in harmony with the scale, form, line, color, and texture of existing environment. Long-term adverse visual impacts are considered to be minor.

No Action Alternative

Hazardous Materials Under the No Action Alternative, the Cahuilla Indian Health Clinic Replacement Project would not be constructed, and no hazardous materials impacts would result. The existing clinic would continue to operate under its existing Medical Waste Management Plan. The project site would continue in its present use or could be developed with other allowable uses. Health care services would continue to be provided at the existing clinic location.

Community Infrastructure

Under the No Action Alternative, the Cahuilla Indian Health Clinic Replacement would not be constructed. No additional utility connections, constructions, or extensions would be necessary under this alternative. Use patterns and demands for public services and utilities would continue at current levels. Public emergency services would continue to operate under current conditions and demands. No impacts on public services or utilities are anticipated under the No Action Alternative.

Visual Resources

Under the No Action Alternative, the Cahuilla Indian Health Clinic Replacement would not be constructed. The Project site would continue in its present use or could be developed with other allowed uses. Health care services would continue to be provided at the existing clinic location no impact to visual resources at the Project site would occur.

4.0 CUMULATIVE, INDIRECT AND GROWTH INDUCING IMPACTS

4.1. Cumulative Impacts

CEQ regulations (40 CFR 1508.7) require the assessment of cumulative impacts in the decision-making process for Federal projects. A cumulative impact is an impact on the environment that results from the incremental impact of one action when added to other past, present, and reasonably foreseeable future actions regardless of which agency (Federal or non-Federal), organization, or person undertakes such other actions. Cumulative impacts can result from individually minor, but collectively significant, actions taking place over a period of time.

The analysis of cumulative effects considers a number of variables including geographic (spatial) limits, time (temporal) limits, and the characteristics of the resource being evaluated. The area

within which a cumulative effect can occur varies by resource. For example, traffic and noise impacts tend to be localized, while air and biology impacts are typically dispersed over larger areas. The geographic scope of each analysis, the cumulative effects study area (CESA) is based on the topography surrounding the Proposed Action and the natural boundaries of the resource affected, rather than jurisdictional boundaries. A number of sources were consulted to identify existing, approved, proposed, and reasonably foreseeable projects for use in the cumulative impact assessment. These included the Riverside County Planning Department, Caltrans District 8, the Bureau of Indian Affairs and the Cahuilla Economic Development Corporation.

The major cumulative project in the area is the Cahuilla Casino Expansion & Hotel, located at 52702 Highway 371 Anza, CA 92539, approximately 2.4 miles (3.9 km) northeast of the Project site. The Cahuilla Casino and Mountain Sky Travel Center are overseen by the Cahuilla Casino Board of Directors (Board) and the Cahuilla Gaming Commission. The former facilities consisted of a gas station, convenience store, casino, offices/support buildings and a surface parking lot. The new hotel and casino are located within the previously developed areas in and around the existing casino site and removed all the existing facilities, excluding the convenience store, gas station, and generator. The expansion includes a multi-level hotel (4 floors of rooms) with 58 rooms, as well as a new 14,000-square-foot casino, restaurant surface parking spaces and related amenities. Construction commenced November 2018 and was completed May 2020.

Additionally, in late 2019, the Cahuilla Economic Development Corporation (CEDC) commenced preparation of an update to the *2017 Cahuilla Tribal Lands Economic Development Master Plan* (Economic Master Plan) for approximately 2,180 acres within the Cahuilla Indian Reservation. The 2017 Economic Development Master Plan identified a range of retail facilities, destination and visitor serving uses, community services and facilities, along with agricultural and solar development on 2,000 acres. Subsequently, the CEDC increased the economic development area with the additional of a 183-acre area south of SR-371 (referred to as the Highway Annex). Planned uses for the Highway Annex include residential; commercial; medical and office use; agricultural; community, public and renewable energy facilities. The updated Economic Master Plan will update allowable uses and identify infrastructure needs. It should be noted the Proposed Project is located within the northeast corner of the Highway Annex.

These cumulative actions were evaluated in conjunction with the impacts of the Proposed Project to determine if they would have any additive effects on the resources impacted by the Proposed Project. Table 4-1 identifies the cumulative effects study area for each resource and summarizes potential cumulative impacts from the construction and operation of the Proposed Project. As shown on Table 4-1, there would be no significant adverse cumulative impacts from the Proposed Action.

Table 4-1. Cumulative Impacts

Resource	Cumulative Effect Study Area CESA	Cumulative Impacts
Topography and Soils	The CESA for topography and soils is confined to the Project site and the areas immediately adjacent. This is because geologic resources, and soils occur at specific locales and are generally unaffected by activities not acting on them directly or immediately adjacent to them.	Construction and operation of the replacement clinic would have negligible to minor impacts on topographic, geologic and soil resources. Through incorporation of site-specific design and construction recommendations, cumulative impacts to topography and soils should be negligible to minor.
Water Resources and Stormwater Water Quality	Areas within the Cahuilla Valley Groundwater Basin	There would be negligible to minor cumulative impacts on water resources from the treatment of wastewater in the on-site septic systems and a leach field. The Project site contains no wetlands or waters of the United States. There will be no cumulative impacts to wetlands or waters of the United States.
Threatened, Endangered, and State Special Status Species	Project site and surrounding areas in Riverside County	The Project site does not provide important habitat for any fish or wildlife species, plant or plant community. The Proposed Project would not degrade the environment or substantially reduce the habitat of fish, wildlife or plant species at the Project site and would have no direct or indirect impact on listed species. There would be no cumulative impacts to listed species.
Air Quality	Eastern Coachella Valley portion of Salton Sea Air Basins	The project area is in non-attainment for Ozone and PM10 and partial non-attainment for PM2.5-24hr. All construction activities would be required to follow County guidelines for minimizing impacts to air quality. Cumulative impacts on air quality would be negligible to minimal.
Land Use	Cahuilla Indian Reservation	Implementation of the Proposed Project would result in negligible to minor impacts to land use, public utilities and services and visual resources. Cumulative land use, visual, public utility and service impacts would be negligible to minor.
Important Farmlands	Consists of the approximately 420,000 acres of important farmland mapped by the California Dept. of Conservation's Farmland Mapping and Monitoring Program in Riverside County in 2016.	Construction of the replacement health clinic would have no direct or indirect impacts on important farmlands and would not contribute to cumulative impacts.
Socioeconomics	Riverside County	Construction and operation of the replacement clinic is expected to create a small amount of short-term (construction) and long-term (facility operation) employment. Minor to moderate beneficial cumulative impacts could result.

Table 4-1. Cumulative Impacts

Resource	Cumulative Effect Study Area CESA	Cumulative Impacts
Historic Properties	Cahuilla Indian Reservation. Resources similar to those in the Project APE are present throughout this area and potential cumulative projects' ground disturbance could impact similar resources	No "historic properties" would be adversely affected by the Proposed Project. If unexpected finds were discovered during construction, appropriate mitigation would be undertaken. Cumulative impacts to historic properties would be negligible.
Noise	Because noise impacts are generally localized, the geographic extent for the analysis of cumulative noise impacts was limited to areas within approximately one mile of the Project site.	Noise levels would be temporarily increased in the project vicinity as a result of construction of the replacement health clinic. No potential cumulative projects were identified within one mile of the Project site that might also incrementally increase noise levels. Cumulative noise impacts are anticipated to be negligible.
Hazardous Materials	Riverside County	The construction of the replacement health clinic would generate construction debris that would have to be disposed of. Operation of the replacement clinic would have a negligible impact on waste and hazardous materials management and cumulative impacts from construction and operation would be minor.
Geologic, Seismic Considerations	Riverside County	Due to modern construction techniques, which address seismic concerns, there would be no impacts to geologic or seismic issues with construction of the replacement health clinic. There would be no cumulative impacts to geologic and seismic issues.
Transportation	The local roadway network considered for analysis of direct impacts (SR-371).	The Cahuilla Casino project included improvements to the intersection of SR-371 and Homestead Road to ensure traffic and safety impacts would not be significant. Increased traffic in the area from the operation of both projects would result in negligible to minor impacts. Minor cumulative impacts to transportation and access issues are expected.

4.2. Indirect Effects

Analyses of the adequacy of local resources, infrastructure, and services are included in the discussion of environmental consequences for each Project Alternative. No significant, unmitigable impacts to resources have been identified that would result from the implementation of the Proposed Action/Proposed Project.

Any utility upgrades would be limited to connecting to existing electrical and/or gas lines and installation of the septic tank and leach field. Local utility providers have existing capacity to serve the Project site. A substantial number of new employees would not move to the community from out of the area; as such, no new housing, schools, or other facilities would be constructed as a result of development on the Project site. There would be no change in off-site land use and no significant change in population density in the vicinity of the Project site.

It is anticipated that the building in which the existing Cahuilla Health Clinic is currently located would be reused for rural commercial uses as permitted within the County's C-R Zone. Impacts associated with the future reuse of this building (i.e., traffic, air quality, public services and utilities) would be similar to those occurring the existing use and would be less than significant.

No significant adverse indirect effects to any environmental issue area would occur.

4.3. Growth Inducing Effects

Growth inducement may constitute a significant effect if the increased growth is not consistent with or accommodated by the land use and growth management plans and policies for the area affected. Local land use plans provide for development patterns and growth policies allow for orderly development supported by adequate public services and utilities such as water supply, roadway infrastructure, sewer services, and solid waste disposal services. A project that would induce "disorderly" growth (i.e. would conflict with local land use plans) could indirectly cause adverse environmental or public service impacts.

Currently, the Cahuilla/Santa Rosa Indian Health Clinic is staffed with 15 full-time employees with five (5) additional staff that rotate on-site weekly or twice monthly. Over the next 5 years, it is anticipated that 2 to 3 new staff persons would be added annually; for a total of 10 to 15 new employees. This increase would not be appreciable. Therefore, the Proposed Project would not directly induce substantial population growth in the region. Analyses of the adequacy of local infrastructure and services are included in the discussion of environmental consequences for each proposed Alternative. No significant, unmitigated impacts have been identified that would result from the Proposed Project.

Utility infrastructure would not be improved or expanded to increase service availability to any areas beyond the Project site. Potable water from existing wells, and wastewater treatment via the

proposed septic system would only serve the Project site. Therefore, growth-inducing impacts for the Proposed Project would be negligible.

5.0 RELATIONSHIP BETWEEN SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

The Proposed Project would result in adverse, short-term impacts due to construction-related activities. Short-term impacts are those that would occur only during the period of construction, and would then cease at the end, or shortly after the end, of construction. Long-term impacts are those that would occur throughout the operational life of the new/replacement health clinic.

Adverse short-term impacts to air quality would occur as a result of emissions from construction vehicles, commuting for construction workers, fugitive dust emissions from active grading and wind erosion of exposed soils. Most of these impacts would cease at the end of construction. Fugitive dust emissions from erosion of exposed soils would continue for a short period after construction ceases, but decrease as revegetation of temporarily disturbed areas takes place. Following construction, minor adverse air quality impacts associated with operations would continue, but at a level reduced from that associated with construction. Both construction and operation-related emissions would be reduced through compliance with federal, state, and local regulations. None of the air quality resource impacts would occur with the No Action Alternative.

Socioeconomic impacts associated with the Proposed Project are expected to be beneficial, due to short-term increases in construction employment and the possible increase in long-term employment opportunities at the new/larger health clinic. These beneficial impacts would be greatest during project construction, when employment levels are highest, and would then continue at a reduced level during project operations. There would be no beneficial socioeconomic impacts associated with the No Action Alternative.

The magnitude and type of adverse impacts to traffic from the Proposed Project would also change over time. The level of adverse impacts would be at their highest during project construction, due to the highest levels of employment and equipment deliveries during this time. Once the Proposed Project becomes operational, adverse traffic impacts associated with increased vehicle trips from higher patient loads could occur, but at a reduced level. No traffic impacts would occur with implementation of the No Action Alternative.

6.0 IRREVERSIBLE OR IRRETRIEVABLE COMMITMENTS OF RESOURCES

Section 40 CFR 1502.16 of the NEPA regulations requires a discussion of any irreversible or irretrievable commitments of resources which would be involved in the Proposed Project.

Implementation of the Proposed Project would result in the consumption of energy as it relates to the fuel needed for construction-related activities. Given the limited size of the new/replacement health clinic facilities, and the limited duration of construction, large amounts of gasoline and diesel fuel would not be required for project construction. Additionally, construction would require the manufacture of new materials, some of which would not be recyclable. The raw materials and energy required for the production of these materials would result in an irretrievable commitment of natural resources. Operation of the Proposed Project would not cause a substantial increase in the consumption or use of non-renewable resources.

The No Action Alternative would not require any non-renewable resources to be consumed.

Construction and operation of the Proposed Project would require the use of a limited amount of hazardous materials such as fuel, lubricants, and cleaning solvents. All hazardous materials would be stored, handled, and used in accordance with BMPs, and by compliance with applicable, federal, state, and local regulations, including a construction-phase SWPPP. Assuming appropriate implementation of these plans and practices, potential degradation of the environment due to accidental spills associated with the Proposed Project's use of hazardous materials would be minimized to the extent practicable.

The No Action Alternative would involve no irreversible use or irretrievable commitment of resources.

7.0 PUBLIC INVOLVEMENT AND AGENCY CONSULTATION

7.1. Agencies, Organizations, and Persons Consulted

The following agencies, organizations, and individuals received a copy of the Environmental Assessment and were invited to comment on its accuracy and adequacy during a 30-day review period. Copies of the Draft Environmental Assessment and any technical appendices may be reviewed at the reception counter of the Cahuilla Tribal Hall offices and on the Riverside-San Bernardino Indian Health Clinic website at <https://www.rsbcih.org/>, BIA, and at the Anza Public Library.

Cahuilla Band of Indians

52701 US Highway 371, Anza, CA 92539

State of California

California State Clearinghouse
Caltrans, District 8

Local

Anza Public Library, 5740 Mitchel Road, Anza, CA 92539

The Bureau of Indian Affairs prepared a Notice of Availability (NOA) for this EA and the draft Finding of No Significant Impact (FONSI) that clearly identified the Proposed Action's potential impacts to the natural and man-made environments. The NOA was published in the Public Record Newspaper and was also sent to interested parties.

8.0 RESPONSIBLE FEDERAL OFFICIAL AND LIST OF PREPARERS

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9.0 REFERENCES

References are listed in Appendix G.