

Santa Ana River Watershed Weather Modification Project

Initial Study & Mitigate Negative Declaration

ADDENDUM NO. 1

AUGUST 7, 2023

SECTION 1 Introduction

This Addendum (No 1; Addendum) to the Initial Study & Mitigated Negative Declaration (IS/MND; State Clearinghouse No. 2022040174) has been prepared for the Santa Ana River Watershed Weather Modification Project (Project), pursuant to Section 2.6 of the IS/MND, which provides guidance for confirming the applicability of the California Environmental Quality Act (CEQA) review if any of the identified sites for installation of the cloud seeding devices are revised from those identified in the IS/MND. Pursuant to CEQA, an addendum may be prepared when changes are proposed to a project that has already been approved, and those changes will not result in new significant impacts or a substantial increase in the severity of previously identified significant impacts (CEQA Guidelines §§ 15162, 15163, 15164). This Addendum was prepared in compliance with the CEQA of 1970 (as amended) and the State CEQA Guidelines (Title 14, California Code of Regulations, § 15000 et seq.). SAWPA issued a Notice of Determination (NOD) for the IS/MND on June 21, 2022.

1.1 Purpose of Addendum

The purpose of this Addendum is to identify potential impacts from changing the location of two prospective project sites at which to install cloud seeding devices for SAWPA's proposed weather modification (i.e., cloud seeding) program. Under CEQA, the lead agency or a responsible agency shall prepare an addendum to an adopted IS/MND if some changes or additions are necessary to the prior CEQA document, but none of the conditions calling for preparation of a subsequent MND have occurred (CEQA Guidelines § 15164). A subsequent MND is only required when the lead agency or responsible agency determines that one of the following conditions has been met:

1. Substantial changes are proposed in the project, or substantial changes occur with respect to the circumstances under which the project is undertaken, which require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects (CEQA Guidelines § 15162 (a)(1),(2));
2. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous MND was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous MND;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous MND;

- c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous MND would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative (CEQA Guidelines § 15162(a)(3)).

A CEQA Addendum is the appropriate CEQA compliance document when changes or additions are necessary to an IS/MND, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR or MND have occurred (CEQA Guidelines, § 15164(a)). The CEQA Guidelines recommend that a brief explanation of the decision to prepare an addendum rather than a subsequent MND be included in the record (CEQA Guidelines § 15164(e)).

This Addendum has been prepared because the proposed modifications to the IS/MND do not meet the conditions for a subsequent MND. This Addendum explains why the proposed modifications would not result in new significant environmental effects nor result in a substantial increase in the severity of previously-identified significant effects. There is no new information demonstrating that the proposed modifications would have new significant effects or substantially increase the severity of significant effects on the environment or would change the conclusions of the previously-certified IS/MND.

An addendum does not need to be circulated for public review, but rather can be attached to the final MND (CEQA Guidelines § 15164(c)). Prior to initiating the modified Project, SAWPA will consider this Addendum together with the Final MND and make a decision regarding the modified Project.

1.2 Description of New Project Elements

SAWPA proposes to install cloud-seeding devices at two locations that were not previously discussed in the original IS/MND, as two of the previously reviewed sites are no longer available for installation. These two locations would not increase the total number of cloud-seeding devices installed as part of the Project. The first additional site is designated for an automated high output ground seeding (AHOGS) unit installation at the Orange County Water District (OCWD) site that will support precipitation in the Southwest Watershed. This site is located along the southwestern border of the Santiago Creek Recharge Basin to the south of Villa Park, CA. The second site is designated for a ground-based cloud nuclei generator (CNG) unit installation at the San Bernardino Valley Municipal Water District (SBVMWD) that will support precipitation in the Northeast Watershed. This site is located west of San Bernardino in the Highland, CA. The table below provides the coordinates for the two new sites.

Location of Two New Sites

Target Area	Installation Site	Unit Installation	Coordinates
Southwest	Orange County Water District (OCWD)	AHOGS	33.803036, -117.813488
Northeast	San Bernardino Valley Municipal Water District (SBVMWD)	CNG	34.132575, -117.18977

SECTION 2 CEQA Checklist

The purpose of the checklist is to evaluate the categories in terms of any changed condition (e.g., changed circumstances, project changes, or new information of substantial importance) that may result in a changed environment result (e.g., a new significant impact or substantial increase in the severity of a previously identified significant effect).

The questions posed in the checklist come from Appendix G of the CEQA Guidelines. A “no” answer does not necessarily mean that there are no potential impacts relative to the environmental category, but that there is no change in the condition or status of the impact since it was analyzed and addressed with mitigation measures in the IS/MND prepared for the project. These environmental categories might be answered with a “no” in the checklist because the proposed project does not introduce changes that would result in modification to the conclusion of the adopted IS/MND.

This comparative analysis has been undertaken pursuant to the provisions of CEQA Guidelines §§15162 and 15164 to provide the SAWPA with the factual basis for determining that an Addendum is appropriate for documenting the modifications to the Project.

2.1 AESTHETICS

Issue	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	No Impact	No	No	None
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Impact	No	No	None
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less than Significant	No	No	None
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	No Impact	No	No	None

AES (a). Have a substantial adverse effect on a scenic vista?

The new sites are not located near or in the viewshed of any designated scenic vistas. The OCWD site would comply with the same Local Scenic Resource Requirements as the IRWD site discussed in Table 4.1-1. The SBVMWD site would comply with the same Local Scenic Resource Requirements as the SAWC-2 site discussed in Table 4.1-1. in Section 4.1 of the IS/MND. The CNGs and AHOGS would be installed in urban areas of previously disturbed land, some with existing structures, and would not fundamentally alter the quality of any scenic vistas. Specifically, the AHOGS unit location at the OCWD and the CNG location at the SBVMWD are both previously disturbed sites with existing structures and/or concrete pads. These areas are not located near or in the viewshed of any designated scenic vistas. Therefore, the selection of the new sites would have no impact on scenic vistas, would not change the character of the surrounding uses, and would not substantially increase the severity of significant impacts identified in the IS/MND.

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

The new sites are not located along or near eligible state scenic highways. Both the CNG and AHOGS would be installed on previously disturbed land and would require minimal ground disturbance during installation. The SBVMWD site would be located approximately 0.18 mile from State Route 330 which was previously eligible for Scenic highway designation and has since been deleted from the list. State Route 330 remains a County Scenic Route; however, the units are relatively compact at a height of a few feet and would not create a visual feature that would draw the eye. Therefore, for the two new locations where a device may be installed, the Project would have a less than significant impact on scenic resources nor substantially increase the severity of significant impacts identified in the IS/MND.

AES (c). In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Both the CNG and AHOGS at the new locations would comply with their local scenic resource requirements as discussed in AES (a). Both the CNG and AHOGS would be installed on previously disturbed land and would require minimal ground disturbance during installation. The units are relatively compact at a height of a few feet and would not create a visual feature that would draw the eye. Therefore, for the two new locations where a device may be installed, the Project would have no impacts on scenic resources nor substantially increase the severity of significant impacts identified in the IS/MND.

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

There would be no lighting installed at any of the units or new sites. The CNGs use a small flame and the AHOGS unit use a flare enclosed in a spark arrestor. The flame and flare would only be lit during storm events and would not be visible to the public. Therefore, for the two new locations where a device may be installed, the Project would have no new significant impacts on light or glare nor substantially increase the severity of significant impacts identified in the IS/MND.

2.2 AGRICULTURE AND FORESTRY RESOURCES.

Issue	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
<p>II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non- agricultural use?	Less than Significant	No	No	None
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact	No	No	None
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	No Impact	No	No	None
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No Impact	No	No	None
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No Impact	No	No	None

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

The OCWD location is designated as Other Land, and the SBVMWD location is designated as Urban and Built-Up Land (CDOC 2023a). Neither of the sites are located on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, for the two new locations where a device may be installed, the Project would have no new significant impacts on Farmland nor substantially increase the severity of significant impacts identified in the IS/MND.

AG (b). Conflict with existing zoning for agricultural use, or a Williamson Act contract?

Neither of the new sites are Williamson Act contract lands or zoned for agriculture as discussed in AG (a). The installation and operation of the units would not alter the existing or potential future land use of the sites. Therefore, the selection of the new sites would have no new significant impacts on agricultural zoning nor substantially increase the severity of significant impacts identified in the IS/MND.

AG (c). Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

The revised locations are not zoned forest land, timberland, or timberland zoned Timberland Production. These new locations would not involve any changes in land use or zoning. Therefore, the Project would have no new significant impacts on forest land nor substantially increase the severity of significant impacts identified in the IS/MND.

AG (d). Result in the loss of forest land or conversion of forest land to non-forest use?

The selection of the new sites do not involve any tree removal and would not convert any forest land to non-forest use. Therefore, the Project would have no new significant impacts on forest land nor substantially increase the severity of significant impacts identified in the IS/MND.

AG (e). Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

The selection of the new sites would not result in any physical changes to any locations that would directly or indirectly convert land uses. Therefore, the Project would have no new significant impacts on farmland nor substantially increase the severity of significant impacts identified in the IS/MND.

2.3 AIR QUALITY

Issue	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	Less than Significant	No	No	None
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Less than Significant	No	No	None
c) Expose sensitive receptors to substantial pollutant concentrations?	Less than Significant	No	No	None
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less than Significant	No	No	None

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

Cloud seeding devices would be installed at the two revised locations in lieu of two locations identified in the IS/MND. Therefore, installation at the two proposed sites would not result in an increase in substantial number of vehicle miles traveled to exceed the projections used by the SCAQMD.

Additionally, the emission of criteria pollutants associated with the transportation and installation of the project equipment would be well below the SCAQMD thresholds as identified in the IS/MND and described below, and would not lead to an exceedance of any applicable air quality standards or conflict with the applicable attainment plans. Therefore, the Project would not result in new significant impacts on air quality nor substantially increase the severity of significant impacts identified in the IS/MND.

AIR (b). Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Cloud seeding devices would be installed at the two revised locations in lieu of two locations identified in the IS/MND. Therefore, installation at the two new proposed sites would not result in emissions that would exceed the SCAQMD's regional thresholds as shown in Table 4.3-5 of the IS/MND. Thus, it would not significantly contribute to an existing violation of air quality standards for regional pollutants (e.g., ozone). In terms of local air quality, the proposed Project would not produce significant emissions exceeding SCAQMD's Localized Significance Thresholds for NO_x, CO, PM₁₀, or PM_{2.5} during the construction phase.

Additionally, the operation of the proposed Project at the two new proposed locations to replace two locations identified in the IS/MND, would remain below the SCAQMD operational mass daily threshold of 55 lbs/day (Table 4.3-3) and the SCAQMD Localized Significance Thresholds of 1 lb/day as determined in the IS/MND. Therefore, the Project would not result in new significant impacts on ambient air quality nor substantially increase the severity of significant impacts identified in the IS/MND.

AIR (c). Expose sensitive receptors to substantial pollutant concentrations?

The proposed CNG location at SBVMWD is located approximately 96 feet from the nearest sensitive receptor (residence) and the proposed AHOGS location at OCWD is located approximately 245 feet from the nearest sensitive receptor (residence). The installation of units and the two proposed locations in lieu of two locations identified in the IS/MND would not exceed the SCAQMD's Localized Significance Thresholds for the specified pollutants and does not warrant an OEHHA cancer risk assessment or a health risk assessment because installation at each site would only take one day. Additionally, operation activities for the proposed Project would not expose sensitive receptors to substantial pollutant concentrations as described above. Therefore, the Project would not result in new significant impacts on ambient air quality nor substantially increase the severity of significant impacts identified in the IS/MND.

AIR (d). Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Construction of two units may produce odors or other objectional emissions associated with diesel construction equipment. However, construction would be temporary and minimal. Operation of the CNG and the AHOGS as described in the IS/MND are not anticipated to result in odors or other objectional emissions. Therefore, the Project would not result in new significant impacts on ambient air quality nor substantially increase the severity of significant impacts identified in the IS/MND.

2.4 BIOLOGICAL RESOURCES

Issue	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Less than Significant with Mitigation	No	No	MM BIO-1
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Less than Significant	No	No	None
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Less than Significant	No	No	None
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Less than Significant with Mitigation	No	No	MM BIO-2
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No Impact	No	No	None
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No Impact	No	No	None

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

As described in Section 4.4.1 of the IS/MND, numerous special-status wildlife and rare plants have been mapped within two miles of installation sites within the last 25 years. Table 1 and 2 show the special status plants and wildlife, respectively, mapped within two miles of the two revised proposed installation sites and their likelihood of occurrence onsite (CDFW 2023). As shown in the tables, some of these species could occur in the vicinity of installation sites. Therefore, SAWPA would implement **MM BIO-1** to identify sensitive wildlife and rare plants and ensure that impacts are less than significant, including for the two new sites.

Additionally, the use of silver iodide and subsequent rain fall would have a negligible and possibly beneficial effect on wildlife and plant species as described in the IS/MND. Therefore, impacts for the two new sites would be the same or similar to those identified in the IS/MND and would not result in new

significant impacts on wildlife nor substantially increase the severity of significant impacts identified in the IS/MND.

Table 1. Special-status plant species mapped within two miles of installation sites and presumed to still exist in the area.

Common Name	Scientific Name	Federal Status	State Status	State Status Rare Plant	Found within 2 miles of Installation Site	Likelihood of Occurrence
California satintail	<i>Imperata brevifolia</i>	NA		2B.1	SBVMWD	None - Property is ruderal and no suitable habitat is present.
Plummer's mariposa-lily	<i>Calochortus plummerae</i>	NA	NA	4.2	SBVMWD	None - Property is ruderal and no suitable habitat is present.
Santa Ana River woollystar	<i>Eriastrum densifolium ssp. sanctorum</i>	Endangered	Endangered	1B.1	SBVMWD	None - Property is ruderal and no suitable habitat is present.
southern tarplant	<i>Centromadia parryi ssp. australis</i>	NA	NA	1B.1	OCWD	None – no suitable habitat is present.
many-stemmed dudleya	<i>Dudleya multicaulis</i>	NA	NA	1B.2	OCWD	Moderate – suitable habitat adjacent to installation site; records <0.5 mile of site.
intermediate mariposa-lily	<i>Calochortus weedii var. intermedius</i>	NA	NA	1B.2	OCWD	Moderate – suitable habitat adjacent to installation site; records <0.5 mile of site.

Notes: NA = Not Applicable

California Rare Plant Rank 1A and 2A – presumed extirpated in California; 1B – rare, threatened, or endangered in California or elsewhere; 2B – rare, threatened, or endangered in California but more common elsewhere. Threat Ranks: 0.1 – Seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat); 0.2 – Moderately threatened in California (20-80% of occurrences threatened/moderate degree and immediacy of threat).

See Appendix B-2 of IS/MND for habitat descriptions for mapped species.

Table 2. Special-status wildlife species mapped within two miles of installation sites and presumed to still exist in the area.

Common Name	Scientific Name	Federal Status	State Status	Found within 2 miles of Site	Likelihood of Occurrence
Southern rubber boa	<i>Charina umbratica</i>	NA	Threatened	SBVMWD	None - Property is ruderal and no suitable habitat is present.
Southern California legless lizard	<i>Anniella stebbinsi</i>	NA	SSC	EOWCD	Low - No suitable habitat likely at installation site, but potentially suitable habitat adjacent.
Santa Ana speckled dace	<i>Rhinichthys osculus ssp. 8</i>	NA	SSC	SBVMWD	None – no suitable habitat present.

Common Name	Scientific Name	Federal Status	State Status	Found within 2 miles of Site	Likelihood of Occurrence
steelhead - southern California DPS	<i>Oncorhynchus mykiss irideus</i> pop. 10	Endangered	Candidate Endangered	SBVMWD OCWD	None – No suitable habitat present at either site.
Western yellow bat	<i>Lasiurus xanthinus</i>	NA	SSC	SBVMWD	None - Property is ruderal and no suitable habitat is present.
San Diego desert woodrat	<i>Neotoma lepida intermedia</i>	NA	SSC	SBVMWD	None - Property is ruderal and no suitable habitat is present.
San Bernardino kangaroo rat	<i>Dipodomys merriami parvus</i>	Endangered	Candidate Endangered	SBVMWD	None - Property is ruderal and no suitable habitat is present.
northwestern San Diego pocket mouse	<i>Chaetodipus fallax fallax</i>	NA	SSC	SBVMWD	Low - No suitable habitat likely at installation site, but potentially suitable habitat adjacent.
coastal California gnatcatcher	<i>Polioptila californica californica</i>	Threatened	SSC	OCWD	Moderate - Suitable habitat present adjacent to site but highly fragmented. Records <0.5 miles
coastal cactus wren	<i>Campylorhynchus brunneicapillus sandiegensis</i>	NA	SSC	OCWD	Moderate - Suitable habitat present adjacent to site but highly fragmented.
least Bell's vireo	<i>Vireo bellii pusillus</i>	Endangered	Endangered	SBVMWD OCWD	SBVMWD – None - Property is ruderal and no suitable habitat is present. OCWD – Moderate - Suitable habitat present adjacent to site. Records <0.5 miles.
American peregrine falcon	<i>Falco peregrinus anatum</i>	NA	FP	OCWD	Moderate - May forage near site. No suitable nesting habitat.

Notes: SSC = California Species of Special Concern; FP = California Fully Protected Species.

See Appendix B-2 of IS/MND for habitat descriptions for mapped species.

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

The CNG and AHOGS units would be installed at the revised locations on flat, previously disturbed areas, and riparian habitat and natural communities would not be affected. Incremental soil erosion, streambank alteration, or localized flooding due to increased cloud seeding would not fundamentally alter riparian habitat and may even provide beneficial relief from drought conditions. Therefore, the selection of the two revised site locations would not result in new significant impacts on riparian habitat nor substantially increase the severity of significant impacts identified in the IS/MND.

BIO (c). Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The operation of units at the two revised locations would contribute to an incremental increase in precipitation to the region as identified in the IS/MND. This increase in precipitation would not be detrimental to wetlands and may provide beneficial additional moisture to support hydrology and vegetation. Therefore, the Project would not result in new significant impacts on wetlands nor substantially increase the severity of significant impacts identified in the IS/MND.

BIO (d). Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The CNG and AHOGS units would be installed at the new locations on flat, previously disturbed areas, and would have no impact on the movement of wildlife, including birds. No trees or shrubs would be removed to install the CNGs and AHOGS. However, there is potential that nesting birds may be present in trees near each of the proposed sites. Therefore, SAWPA would implement **MM BIO-2** to ensure that impacts to nesting birds (particularly ground-nesting species) from installation are less than significant.

The revised sites would replace two identified in the IS/MND and therefore would not result in increased precipitation relative to that described in the IS/MND. Therefore, operation at the two new proposed sites would not be substantial enough to alter habitat conditions within streams via increased precipitation such that their existing use by native fish and wildlife would change. Therefore, the Project would not result in new significant impacts on wildlife nor substantially increase the severity of significant impacts identified in the IS/MND.

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

Units at the two revised sites would be installed on flat, previously disturbed areas, and would not require the removal of any trees. Installation at the sites would not conflict with the goals or policies of the County General Plans. Therefore, the Project would not result in new significant impacts on biological resources nor substantially increase the severity of significant impacts identified in the IS/MND.

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

The two revised site locations are not located within an adopted HCP. Therefore, the Project would not result in new significant impacts on biological resources nor substantially increase the severity of significant impacts identified in the IS/MND.

2.5 CULTURAL RESOURCES

Issue	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	No Impact	No	No	None
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	Less than Significant with Mitigation	No	No	MM CUL-1
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	Less than Significant	No	No	None

CR (a). Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

The two additional units would be installed on flat, previously disturbed areas, and would not disturb any historical structures, sites, or buildings. Therefore, the Project would not result in new significant impacts on historical resources nor substantially increase the severity of significant impacts identified in the IS/MND with the addition of these two potential locations.

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

The two units would be installed at previously disturbed sites and would require minimal ground disturbance. Archeological impacts are unlikely; however, SAWPA would implement **MM CUL-1** to ensure that impacts are less than significant in the event of archaeological discovery. Largely, potential impacts for the two new sites would be the same or similar to those identified in the IS/MND. Therefore, the Project would not result in new significant impacts on archaeological resources nor substantially increase the severity of significant impacts identified in the IS/MND with the addition of these two potential locations.

CR (c). Disturb any human remains, including those interred outside of dedicated cemeteries?

The new locations for two units are previously disturbed sites and would require minimal ground disturbance. Encountering and disturbing human remains is unlikely; however, SAWPA would implement the protocols discussed in Section 4.5.1 of the IS/MND to ensure impacts would be less than significant. Therefore, the Project would not result in new significant impacts on cultural resources nor substantially increase the severity of significant impacts identified in the IS/MND with the addition of these two potential locations.

2.6 ENERGY

	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
VI. ENERGY. Would the project:				
Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less than Significant	No	No	None
Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	No Impact	No	No	None

ENG (a). Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Construction at the two new sites would replace construction at two of the originally analyzed sites and therefore would not change or increase any fuel or energy consumption as described in the IS/MND. Therefore, the Project would not result in new significant impacts on energy resources nor substantially increase the severity of significant impacts identified in the IS/MND.

ENG (b). Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Construction at the two new sites would replace construction at two of the originally analyzed sites and would not result in any effect on energy supplies or the demand for energy. Therefore, the Project would not result in new significant impacts on energy resources nor substantially increase the severity of significant impacts identified in the IS/MND.

2.7 GEOLOGY AND SOILS

Issue	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
VII. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none"> i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. 	Less than Significant	No	No	None

Issue	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
VII. GEOLOGY AND SOILS. Would the project:				
ii. Strong seismic ground shaking?	Less than Significant	No	No	None
iii. Seismic-related ground failure, including liquefaction?	Less than Significant	No	No	None
iv. Landslides?	Less than Significant	No	No	None
b) Result in substantial soil erosion or the loss of topsoil?	Less than Significant	No	No	None
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Less than Significant	No	No	None
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Less than Significant	No	No	None
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	No Impact	No	No	None
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	No Impact	No	No	None

GEO (a). Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault; Strong seismic ground shaking; Seismic-related ground failure, including liquefaction; or, Landslides?

Less than Significant. The CNG site at SBVMWD is not located within an Alquist-Priolo Earthquake Fault, Liquefaction, or Landslide Zone. The AHOGS parcel is not located within a known Alquist-Priolo Earthquake Fault Zone, all or a portion of the parcel lies within a liquefaction zone, and does not lie within a landslide zone (CDOC 2023b). Because neither location includes the development of a habitable structure a geotechnical investigation not required. Exposure of people or structures to the risk of loss, injury, or death as a result of strong seismic ground shaking or seismic-related ground is unlikely as the units would be unoccupied and located a minimum of 50 feet away from occupied residences/buildings.

Additionally, the two locations would follow suspension criteria presented in Section 2.3.4, which would preclude cloud seeding during heavy precipitation events and therefore would not contribute to subsequent risks detailed above. Therefore, the Project would not result in new significant impacts on geologic resources nor substantially increase the severity of significant impacts identified in the IS/MND.

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

Installation of cloud seeding units at the two new sites would replace installation at two sites previously identified in the IS/MND. Therefore, operations would not result in any additional impacts from identified in the IS/MND. It would contribute incremental increases in precipitation and minor subsequent erosion and topsoil loss. The additional locations would not result in a cumulative increase snowfall surpassing the range of values observed natural. Therefore, the Project would not result in new significant impacts on soil erosion nor substantially increase the severity of significant impacts identified in the IS/MND.

GEO (c). Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

A portion of the parcel containing EOCDW lies within a liquefaction zone (CDOC 2023b). However, the project does not involve construction of any structures or any activities that would cause a significant impact on the stability of the geologic unit or soil at the additional locations (installation of AHOGs and CNGs involves soil borings of less than 1 foot per installation). As discussed, potential impacts resulting from increased precipitation remain less than significant. Therefore, the Project would not result in new significant impacts on geologic resources nor substantially increase the severity of significant impacts identified in the IS/MND.

GEO (d). Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

The OCWD site contains mostly fill material with characteristic gravelly coarse sand. The SBVMWD site contains stony loamy sands (NRCS 2022). These soils are not expansive soils. Therefore, the Project would not result in new significant impacts on geologic resources nor substantially increase the severity of significant impacts identified in the IS/MND.

GEO (e). Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

The two new locations would not require the use of septic tanks or alternative wastewater disposal systems and would not impact any existing septic tanks or alternative wastewater disposal systems. Therefore, the Project would not result in new significant impacts on geologic resources nor substantially increase the severity of significant impacts identified in the IS/MND.

GEO (f). Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The additional locations would adhere to the construction methods described in Section 2 of the IS/MND and would not infringe upon strata in which paleontological resources or unique geological

features are found. Therefore, the Project would not result in new significant impacts on geologic resources nor substantially increase the severity of significant impacts identified in the IS/MND.

2.8 GREENHOUSE GAS EMISSIONS

Issue	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less than Significant	No	No	None
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less than Significant	No	No	None

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

The revision of two of the selected sites would not result in any increase in construction or GHG emissions from what was described in the IS/MND. Therefore, the Project would not result in new significant impacts resulting from GHG emissions nor substantially increase the severity of significant impacts identified in the IS/MND.

GHG (b). Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

The revision of two of the selected sites would not change the Project contribute to increasing water supply, utilizing solar panels, and would be constructed in accordance with BMPs of the California green building standards code or efficiency and sustainability. Therefore, the additional locations would be consistent with goals of AB 32 and the CARB Scoping Plan update to reduce GHG emissions and the effects of climate change. Therefore, the Project would not result in new significant impacts from GHG emission nor substantially increase the severity of significant impacts identified in the IS/MND.

2.9 HAZARDS AND HAZARDOUS MATERIALS

Issue	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than Significant	No	No	None

Issue	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less than Significant	No	No	None
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less than Significant	No	No	None
a) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	No Impact	No	No	None
b) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	No Impact	No	No	None
c) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	No Impact	No	No	None
d) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	Less than Significant	No	No	None

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

The installation of units at the new sites would be conducted as described in the IS/MND and comply with surrounding regulatory programs and regulations as described in the IS/MND. There would be no change in the volume of iodide released from that described in the IS/MND. Therefore, the Project would not result in new significant impacts from hazardous resources nor substantially increase the severity of significant impacts identified in the IS/MND.

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

The two revised locations are private property and all associated hazardous tanks would be locked and security measures (e.g., cameras and fencing) would be installed to prevent tampering. The hazard to the public or environment through reasonably foreseeable upset or accident conditions would be less than significant. Therefore, the Project would not result in new significant impacts from hazardous materials nor substantially increase the severity of significant impacts identified in the IS/MND.

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

The revised sites are not located within one-quarter mile of an existing or proposed school. The nearest school is 0.33 miles from the OCWD site. Therefore, the Project would not result in new significant impacts from hazardous materials nor substantially increase the severity of significant impacts identified in the IS/MND with the addition of these two potential locations.

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

The revised sites are not located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, the Project would not result in new significant impacts from hazardous materials nor substantially increase the severity of significant impacts identified in the IS/MND.

HAZ (e). For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the Project area?

The revised sites would not be located within an airport land use plan and no airports are located within a 2-mile radius of either additional site. The closest airport, San Bernardino Airport, is approximately 3.83 miles from the SBVMWD site. Therefore, the Project would not result in new significant impacts from hazards nor substantially increase the severity of significant impacts identified in the IS/MND.

HAZ (f). Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The revised sites would not have any effects on adopted emergency response plans from that described in the IS/MND. SAWPA would implement suspension criteria and would reduce or stop cloud seeding that may result in high snowfall and problematic road conditions that would hinder emergency vehicle access and evacuations beyond what is typical of the area. Therefore, the Project would not result in new significant impacts from hazards nor substantially increase the severity of significant impacts identified in the IS/MND.

HAZ (g). Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

As discussed above, CNGs require the use of propane as an ignition source. The propane would be transported and handled by a licensed third-party contractor and would not create an unusual wildland fire risk. The AHOGS require the use of flares as an ignition source. The flares are housed inside aluminum spark arrestors that prevent sparks from reaching the ground. In addition, vegetation around the units would be maintained to ensure that it does not pose a fire risk. The selection of the new sites would not result in the exposure of people or structures to any increased risk of wildland fires that is different than that identified in the IS/MND. Both sites are previously disturbed locations. Therefore, the Project would not result in new significant impacts from hazards nor substantially increase the severity of significant impacts identified in the IS/MND.

2.10 HYDROLOGY AND WATER QUALITY

Issue	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less than Significant	No	No	None
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	No Impact	No	No	None
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	Less than Significant	No	No	None
i. result in a substantial erosion or siltation on- or off-site;	Less than Significant	No	No	None
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	Less than Significant	No	No	None
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	Less than Significant	No	No	None
iv. impede or redirect flood flows?	Less than Significant	No	No	None
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less than Significant	No	No	None
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	No Impact	No	No	None

HYD (a). Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Installation of the units at the two revised locations would not exceed the established secondary drinking water standard of 100 ppb for silver and the Santa Ana RWQCB Water Quality Plan specifies a limit of 50 ppb silver in groundwater designated for municipal use (Santa Ana RWQCB 2019). These values are over 500-1,000 times greater than concentrations of silver measured in surface water during other cloud seeding projects. Therefore, the Project would not result in new significant impacts on water quality nor substantially increase the severity of significant impacts identified in the IS/MND.

HYD (b). Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The cloud seeding units do not require groundwater and would not interfere with groundwater recharge. Changing the location of the cloud seeding units would have no impact on groundwater, as described in the IS/MND.

HYD (c). Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: result in a substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows?

The ground-based seeding units would be installed on disturbed land and would not require the creation of any impervious surfaces or grading or excavation that would result in on- or off-site erosion or siltation. The precipitation and stream flow increases would be as described in the IS/MND. Therefore, the Project would not result in new significant impacts on water quality nor substantially increase the severity of significant impacts identified in the IS/MND.

HYD (d). In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

The revised location of two cloud seeding units would contribute to increased snowfall and snowmelt in the target area however they would be subject to the same SAWPA suspension criteria curtailing cloud seeding when there is a risk of rainfall or a rain-on-snow event that could result in flooding. Additionally, propane and cloud seeding solutions would be stored in sealed and locked containers. Therefore, the Project would not result in new significant impacts on water quality nor substantially increase the severity of significant impacts identified in the IS/MND.

HYD (e). Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The OCWD location would be subject to Orange County’s Coastal Plain of Orange County Groundwater Basin, which DWR has designated as a medium-priority basin (DWR 2023). However, the plan does not include any water quality objectives for silver. Additionally, the project would not result in the use of groundwater and would therefore would not impair any beneficial uses outlined by the EMWD. Therefore, the Project would not result in new significant impacts on water quality nor substantially increase the severity of significant impacts identified in the IS/MND.

2.11 LAND USE AND PLANNING

Issue	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
XI. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	No Impact	No	No	None

Issue	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
XI. LAND USE AND PLANNING. Would the project:				
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	No Impact	No	No	None

LUP (a). Physically divide an established community?

The revised sites would be located on private property and would not involve the construction of any structures that would physically divide a community. Therefore, the Project would not result in new significant impacts on Land Use nor substantially increase the severity of significant impacts identified in the IS/MND.

LUP (b). Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The installation and operation of cloud seeding units is not in conflict with any plan/policy/regulation or prohibited by any of the city and county ordinances listed in Table 4.11-1 of the IS/MND that govern the land use of the Project sites. Therefore, the Project would not result in new significant impacts on Land Use nor substantially increase the severity of significant impacts identified in the IS/MND.

2.12 MINERAL RESOURCES

Issue	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
XII. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	No Impact	No	No	None
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	No Impact	No	No	None

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

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

The revised sites would only require minimal ground excavation and would occupy only 10 ft by 10 ft sized area at each site. Therefore, the Project would not result in new significant impacts on mineral resources nor substantially increase the severity of significant impacts identified in the IS/MND.

2.13 NOISE

Issue	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
XIII. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less than Significant	No	No	None
b) Generation of excessive groundborne vibration or groundborne noise levels?	Less than Significant	No	No	None
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No Impact	No	No	None

NOI (a). Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction activities for the installation of the CNGs and AHOGS in the revised locations could slightly increase noise levels temporarily in the immediate vicinity of the Project sites. While generated sound could reach up to 85 dBA, all construction activity would be minimal as construction would be short term (approximately 30-60 minutes) and is expected to last a maximum of one day per site.

Operation of the CNG and AHOGS units is not anticipated to increase the ambient noise levels above the levels existing without the Project. The Project would remain within established noise limits at each site and will not contribute to significant increases in traffic volumes at any time; therefore, the Project will not lead to significant levels of traffic-generated noise. Therefore, the Project would not result in new significant impacts from noise nor substantially increase the severity of significant impacts identified in the IS/MND.

NOI (b). Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?

The methods proposed for installation of the CNG and AHOGS units as described in Section 2.2 of the IS/MND, and the small equipment involved, would not generate perceptible ground-borne vibrations. Operation of the units is limited to ignition of the flares in the AHOGS units and/or burning of the solution of silver iodide and acetone at the CNG units which would not generate ground-borne vibrations at the revised location. Therefore, the Project would not result in new significant impacts from noise nor substantially increase the severity of significant impacts identified in the IS/MND.

NOI (c). For a project located within the vicinity of private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the Project area to excessive noise levels?

The two revised sites would not be located within an airport land use plan and no airports are located within a 2-mile radius of either additional site. The closest airport, San Bernardino Airport, is approximately 3.83 miles from the SBVMWD site. Therefore, the Project would not result in new significant impacts from hazards nor substantially increase the severity of significant impacts identified in the IS/MND.

2.14 POPULATION AND HOUSING

Issue	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
XIV. POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	No Impact	No	No	None
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No Impact	No	No	None

POP (a). Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Neither of the revised sites includes construction of new homes or businesses and does not extend roads or another infrastructure. Therefore, the Project would not result in new significant impacts on population and housing resources nor substantially increase the severity of significant impacts identified in the IS/MND.

POP (b). Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The revised sites would be located on private property and would not displace any existing housing. Therefore, the Project would not result in new significant impacts on population and housing resources nor substantially increase the severity of significant impacts identified in the IS/MND.

2.15 PUBLIC SERVICES

Issue	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
XV. PUBLIC SERVICES. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:	No Impact	No	No	None
i. Fire protection?	No Impact	No	No	None
ii. Police protection?	No Impact	No	No	None
iii. Schools?	No Impact	No	No	None
iv. Parks?	No Impact	No	No	None
v. Other public facilities?	No Impact	No	No	None

PUB (a). Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

i. Fire protection?

Installation of the units at the revised sites would not increase the demand on fire protection services and facilities such that constructing new or expanding existing fire protection services and facilities would be required to maintain response times and service ratios. Additionally, use of the units would be delayed until sufficient rainfall has occurred to reduce concerns over fire safety. Therefore, the Project would not result in new significant impacts on Public Service resources nor substantially increase the severity of significant impacts identified in the IS/MND.

ii. Police protection?

Installation of the units at the revised sites would not increase the population in the Project area by creating new housing or employment opportunities that would increase demand for police protection. Therefore, the Project would not result in new significant impacts on Public Service resources nor substantially increase the severity of significant impacts identified in the IS/MND.

iii. Schools?

Installation of the units at the revised sites would not increase the population in the Project area by creating new housing or employment opportunities. Therefore, the Project would not result in new significant impacts on Public Service resources nor substantially increase the severity of significant impacts identified in the IS/MND.

iv. Parks?

Installation of the units at the revised sites would not increase the population in the Project area by creating new housing or employment opportunities. Therefore, the Project would not result in new significant impacts on Public Service resources nor substantially increase the severity of significant impacts identified in the IS/MND.

v. Other public facilities?

Installation of the units at the revised sites would not affect other public facilities that exist in the Project area. Therefore, the Project would not result in new significant impacts on Public Service resources nor substantially increase the severity of significant impacts identified in the IS/MND.

2.16 RECREATION

Issue	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
XIV. RECREATION. Would the project:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	No Impact	No	No	None
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	No Impact	No	No	None

REC (a). Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Installation of the units at the revised sites would not create any new housing or businesses that would increase population and use of recreational facilities. Therefore, the Project would not result in new significant impacts on recreational resources nor substantially increase the severity of significant impacts identified in the IS/MND.

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

The Project does not include the construction or expansion of any recreational facilities, and therefore would not result in new significant impacts on recreational resources nor substantially increase the severity of significant impacts identified in the IS/MND with the addition of these two potential locations.

2.17 TRANSPORTATION

Issue	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
XVII. TRANSPORTATION. Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less than Significant	No	No	None
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	Less than Significant	No	No	None
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than Significant	No	No	None
d) Result in inadequate emergency access?	Less than Significant	No	No	None

TRA (a). Conflict with program, plan, ordinance or policy addressing the circulation system including transit, roadway, bicycle, and pedestrian facilities?

The two revised sites would require one round trip for installation and may require 15 trips per year during operations. The negligible increase in trips anticipated for construction or operation would not have the potential to result in any adverse effects on the traffic system and would not conflict with any transportation-related program, plan, ordinance, or policy. Therefore, the Project would not result in new significant impacts on transportation nor substantially increase the severity of significant impacts identified in the IS/MND.

TRA (b). Conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?

The installation and operation of two revised sites would not increase total trips per day as described in the IS/MND. Additionally, transportation to these two sites would not conflict or be inconsistent with CEQA Guidelines detailed in Section 15064.3, subdivision (b). Therefore, the Project would not result in new significant impacts on transportation nor substantially increase the severity of significant impacts identified in the IS/MND.

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

The installation and operation of two revised sites would not create a substantial safety risk or interfere with air traffic patterns because the roads to the project sites already exist, and the number of vehicle trips would be minimal. Further, installation of the CNGs and AHOGS would not prevent or limit road access. Therefore, the Project would not result in new significant impacts on transportation nor substantially increase the severity of significant impacts identified in the IS/MND.

TRA (d). Result in inadequate emergency access?

The installation of cloud seeding devices at these two locations would not result in any physical development or other changes to the proposed Project sites or surrounding area such that emergency access would be reduced or otherwise adversely affected. In addition, Project suspension criteria was developed by SAWPA and NAWC as detailed in Section 2.4.5, *Suspension Criteria*. These suspension criteria and restrictions were developed to avoid the potential for Project activities to contribute to significant flood hazards, which may have the indirect effect of hindering emergency access. Therefore, the Project would not result in new significant impacts on transportation nor substantially increase the severity of significant impacts identified in the IS/MND.

2.18 TRIBAL CULTURAL RESOURCES

Issue	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
XVIII. TRIBAL CULTURAL RESOURCES.				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: <ul style="list-style-type: none"> i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or 	Less than Significant with Mitigation	No	No	MM TCR-1 MM CUL-1
<ul style="list-style-type: none"> ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. 	Less than Significant	No	No	None

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

The two revised sites have experienced prior disturbance, and the probability of tribal cultural resources present in the subsurface is very low. While impacts to an archaeological resource are unlikely due to the prior disturbance activities, SAWPA would implement **MM TCR-1**, in addition to **MM CUL-1**, to ensure that impacts are less than significant. Therefore, the Project would not result in new significant impacts on tribal cultural resources nor substantially increase the severity of significant impacts identified in the IS/MND.

2.19 UTILITIES AND SERVICE SYSTEMS

Issue	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	No Impact	No	No	None
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	No Impact	No	No	None
c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	No Impact	No	No	None
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	No Impact	No	No	None
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	No Impact	No	No	None

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

The operation of standalone CNGs and AHOGS on private property would be powered by their own individual solar panels. The Project would not require the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities. Therefore, the Project would not result in new significant impacts on utilities nor substantially increase the severity of significant impacts identified in the IS/MND.

UT (b). Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Installation of the units at the revised sites do not require any water during installation or operation and would increase precipitation within the Project area. Therefore, the Project would benefit utilities identified in the IS/MND.

UT (c). Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?

The additional units would not generate any waste water and therefore, the Project would not result in new significant impacts on utilities nor substantially increase the severity of significant impacts identified in the IS/MND.

UT (d). Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

The waste generated by the installation at these two revised locations would consist of the bases of the spent flares on the AHOGS and would not increase waste generation from that described in the IS/MND. Therefore, the Project would not result in new significant impacts on utilities nor substantially increase the severity of significant impacts identified in the IS/MND.

UT (e). Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The revised locations would create minimal solid waste, and would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, the Project would not result in new significant impacts on utilities nor substantially increase the severity of significant impacts identified in the IS/MND.

2.20 WILDFIRE

Issue	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	Less than Significant	No	No	None
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Less than Significant	No	No	None
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	No Impact	No	No	None

Issue	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Less than Significant	No	No	None

WFR (a). Substantially impair an adopted emergency response plan or emergency evacuation plan?

The installation of the two revised sites have a small footprint and would not be located along emergency access or evacuation routes, they would not be expected to interfere with the movement of people or vehicles, nor would they interfere with any adopted emergency response plans or evacuation plans.

Installation of the units at the revised sites would not change the incremental contribution to time needed to clear snow from roadways as analyzed in the IS/MND. Therefore, the Project would not result in new significant impacts from wildfire nor substantially increase the severity of significant impacts identified in the IS/MND.

WFR (b). Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The ground-based cloud seeding apparatuses would not begin operation until sufficient rainfall has occurred to reduce the local risk of wildfire. AHOGS flares would only be ignited when a convection band passes over one of the sites when rain is present to further reduce any concerns about small sparks hitting the ground. Vegetation around the units would also be managed to further reduce the risk of wildfire. Because they would only be operated during wet weather conditions, they would not be expected to pose a wildfire risk. Also, because propane is widely used in a variety of applications for residential, commercial, and industrial uses, its use in the cloud seeding program would not result in an unusual fire risk. The change in location to the two new sites would have no impact on exposure to wildfire risk as both units would be installed in a disturbed, previously developed location. Therefore, the Project would not result in new significant impacts on wildfire resources nor substantially increase the severity of significant impacts identified in the IS/MND.

WFR (c). Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Installation of the units at the revised sites would not require the installation of new infrastructure beyond the small footprint to house and stabilize the CNGs and AHOGS. Therefore, the Project would not result in new significant impacts on wildfire resources nor substantially increase the severity of significant impacts identified in the IS/MND.

WFR (d). Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

As described in Section 2.4 of the IS/MND, SAWPA would implement suspension criteria in areas that have extensive vegetation loss or post-fire instability that might create potential for downslope flooding or landslides. Operation of the units at the revised sites would contribute incremental increases in precipitation and minor subsequent erosion and topsoil loss as identified in the IS/MND. Therefore, the Project would not result in new significant impacts on soil erosion nor substantially increase the severity of significant impacts identified in the IS/MND.

2.21 MANDATORY FINDINGS OF SIGNIFICANCE

Issue	Adopted IS/MND Conclusion	Do the Proposed Changes Involve New Impacts	Do the Proposed Changes Increase Severity of Impact in IS/MND	Adopted IS/MND Mitigation Measure
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	Less than Significant with Mitigation	No	No	MM BIO-1 MM BIO-2
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	Less than Significant	No	No	None
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	Less than Significant	No	No	None

Would the Project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

The Project does not threaten any species and would not substantially reduce available habitat for any species, including listed species. All the proposed sites have experienced prior development and are not identified as high-quality habitat for any species. Although the development footprint for the installation of the cloud seeding units is relatively nominal (up to 10 square feet when placed on a cement pad; see Section 2.2.1) and would not significantly threaten any species, potential impacts to biological resources would be ensured to be less than significant with the application of the **MM BIO-1** (pre-construction

clearance survey for sensitive plant and wildlife species) and **MM BIO-2** (pre-construction clearance survey for nesting birds) (Section 4.4.2).

MAN (b). Would the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

No other uses or projects are proposed for the sites; therefore, the only potential cumulative impacts would be limited to potential off-site effects, including for example air quality, transportation, and noise. As discussed in the sections above, the installation of the units at the revised sites would not result in any new significant impacts to any resources and would not contribute to any new significant cumulative impacts in the Project area.

MAN (c). Would the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

The revision of the two locations would not increase the silver iodide released into the environment and therefore would not result in any new significant impacts or different impacts as described in the IS/MND. Comprehensive reviews of cloud seeding programs have also shown that there is no evidence of harm to humans or the environment from the use of silver iodide (Cardno ENTRIX 2011, Fisher et al. 2015). Therefore, the Project would not cause substantial adverse effects on human beings.

SECTION 3 REFERENCES

- California Department of Conservation (CDC). 2023a. California Important Farmland Mapper. <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed August 4, 2023.
- California Department of Conservation (CDC). 2023b. Earthquake Zones of Required Investigation. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed August 4, 2023.
- California Department of Fish and Wildlife (CDFW). 2023. California Natural Diversity Database. <https://apps.wildlife.ca.gov/bios6/Default.aspx>. Accessed August 7, 2023.
- California Department of Water Resources (CDWR). 2016. SGMA Basin Prioritization Dashboard <https://gis.water.ca.gov/app/bp-dashboard/final/>. Accessed August 4, 2023.
- Natural Resources Conservation Service (NRCS). 2022. Web Soil Survey. Available at: <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>. Accessed January 10, 2022.