Second Addendum to the Mitigated Negative Declaration for the Rinconada Water Treatment Plant Residuals Management Project

SCH# 2013021048

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Key Terminology

Beneficial Impact: A project impact is considered beneficial if it would result in the enhancement or improvement of an existing physical condition in the environment – no mitigation is required.

Best Management Practices: A subset of mitigation measures typically derived from standardized Valley Water operating procedures. These practices have been identified as methods, activities, procedures, or other management practices for the avoidance or minimization of potential adverse environmental effects. They have been designed for routine incorporation into project designs and represent the "state of the art" impact prevention practices.

Less-than-significant Impact: This is indicated in the Initial Study checklist where the impact does not reach the standard of significance set for that factor and the project would therefore cause no substantial change in the environment (no mitigation needed).

Mitigation Measures: Mitigation includes: (a) avoiding the impact altogether by not taking a certain action or parts of an action; (b) minimizing impacts by limiting the degree or magnitude of the action and its implementation; (c) rectifying the impact by repairing, rehabilitating, or restoring the impacted environment; (d) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and (e) compensating for the impact by replacing or providing substitute resources or environments.[1]

No Impact: This is indicated in the Initial Study where, based on the environmental setting, the stated environmental factor does not apply to the proposed project.

Potentially Significant Impact: An environmental effect that may cause a substantial adverse change in the environment; however additional information is needed regarding the extent of the impact to make a determination of significance. For the purposes of review such are treated as if significant impact and mitigation measures are proposed.

Significance Criteria: A set of criteria used by the lead agency to determine whether an impact would be considered significant. Valley Water relied upon the significance criteria set forth in the CEQA Guidelines and criteria based on the regulatory standards of local, state and federal agencies.

Significant Impact: An impact that would likely result in a substantial adverse change in the physical conditions of the environment. Mitigation measures and/or project alternatives are identified to avoid or reduce these effects to the environment.

[1] Authority cited: Sections 21083 and 21087, Public Resources Code; Reference: Sections 21002, 21002.1, 21081, and 21100(c), Public Resources Code.

Section 1 Introduction

Proposed Modified Project Background and Need

The Rinconada Water Treatment Plant (RWTP or Plant) is a conventional water treatment plant (WTP) that employs solids contact clarifiers and granular media filters. Source waters include the South Bay Aqueduct, San Luis Reservoir and local reservoirs in Santa Clara County. Work on the residuals management facilities at the RWTP began in 2013 as part of the *Residuals Management Project* (RMP or approved project). The RMP was evaluated and approved in 2013 by the Santa Clara Valley Water District (Valley Water) under an Initial Study/Mitigated Negative Declaration (2013 IS/MND) (State Clearinghouse No. 2013021048). The scope of the RMP included the following main components:

- Two new gravity thickeners and a centrifuge feed pump station
- A new centrifuge building
- A new loadout-structure
- Solids drive through area
- Service road extension inside the Plant process area
- Modification of existing washwater recovery basins to increase capacity and lengthen the life of existing lining, and to enable solids pumping and washwater return pumping and cleaning upgrades.
- Yard piping
- Electrical and instrumentation conduits

Since the adoption of the RMP IS/MND, Valley Water identified a number of issues with the operation of the upgraded RMP at the RWTP since it went online in early 2016. The RWTP is a base load plant in that it tends to operate at high production rates for weeks or even months at a time while peak demands are met by other sources. Furthermore, the RWTP is the only water treatment plant on the west side of the Valley Water's service area and is the main water source for customers there. As a result of its function and location, near-maximum solids production can be expected to occur continuously over multiple months. Therefore, the system must be reliable, easily operable, and with built-in redundancy. Although this reliability was intended when the RMP was conceived, many deficiencies were identified once the system was in operation. Valley Water is proposing to make modifications to the approved RMP to correct those deficiencies, and the project modifications are referred to in this Addendum as the Rinconada Water Treatment Plant Residuals Remediation Project (RRP or proposed modified project).

CEQA Consideration

Valley Water prepared this MND Addendum in compliance with Section 15164(b) of the CEQA Guidelines, which states:

> An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for preparation of a subsequent EIR or negative declaration have occurred.

Section 15162 of the CEQA Guidelines states:

> When an MND has been adopted for a project, no subsequent MND shall be prepared for

the project unless the lead agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:

(1) Substantial changes are proposed in the project which will require major revisions of the previous MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects
(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects
(3) New information of substantial importance which was not known or could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration 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 will be substantially more severe than discussed in the previous MND
    (C) Mitigation measures or alternatives found to not 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
    (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 measure or alternative

As demonstrated in the analysis below, conditions described in section 15162 requiring preparation of a subsequent MND are not present with respect to the proposed modified project. The proposed project changes would not result in new significant environmental effects or substantially increase the severity of previously identified significant environmental effects. No new mitigation measures or alternatives which are considerably different from those identified in the 2013 IS/MND and would substantially reduce the project effects on the environment have been identified or would be necessary to address the changed environmental effects. Therefore, preparation of an Addendum to the adopted IS/MND is appropriate under Section 15164(b) of the CEQA Guidelines.

The mitigation measures in Appendix A include those mitigation measures already approved in the Mitigation Monitoring and Reporting Program (MMRP) for the adopted 2013 RMP IS/MND that this proposed modified project, the RRP, will continue to implement during construction.

Section 2 Description of Proposed Modified Project

Modified Project Objectives

The proposed modified project would continue to ensure that the RWTP efficiently and reliably provides potable water to water retailers in Valley Water's service area that was intended as part of the approved project. Accordingly, key objectives of this proposed modified project are consistent with the objectives that were previously identified in the 2013 IS/MND: *to provide efficient, safe, and reliable management of process residuals for the next 20 years with sufficient robustness to accommodate potential future changes to the Plant's primary treatment processes*.

In addition to the objectives previously mentioned, Valley Water has identified a series of objectives for the proposed modified project as summarized below:

- Provide a system that can be operated by one operator during normal work shifts.
- Provide three (3) days of sludge storage.
- Size the system to process weekly sludge production over 40 hours of dewatering operation.
- Provide system redundancy to allow sludge processing with major components (e.g., centrifuges and pumps) out of service.
- Design the system to allow access for more difficult maintenance and repair activities
- Construct the proposed modified project within the site limitations with concurrent construction of Valley Water June 20, 2014 *Rinconada Water Treatment Plant Reliability Improvement Project* (RIP).
- Process solids while modifying the Residuals Management Facility and ensure that Plant operations are not impacted during construction.
- Provide necessary start-up, commissioning and hand-off of new and upgraded facilities.
- Ensure that the upgraded system meets applicable regulatory requirements.
- Meet Valley Water and project-specific performance requirements during all phases of the project.

Modified Project Description - Scope of Work

The proposed modified project would provide improvements to the residual process at the RWTP located in the Town of Los Gatos (**Figure 2.1**) that were intended as part of the RMP. The proposed modified project would be within the same footprint as the RMP and the modified project activities would occur within an approximately 134,473 square foot area (approximately 3 acres) inside of the existing Plant. **Figure 2.2** shows the existing facilities at the RWTP. **Figure 2.3** shows the modified project site layout, including facilities that would be demolished, the truck route through the site during construction, and locations of construction trailers.

The modified project, as proposed, would include the following main components:

- Installation of two new concrete sludge storage/mixing tanks
- Installation of two new centrifuges and a new polymer system in the existing Belt Press Building (now used for equipment storage and shop space)
- Installation of four new centrifuge feed pumps
- Installation of new yard piping
- Modifications to the existing loadout structure
- Modifications to the existing thickener outlet piping
- Modifications to the existing electrical supply and control system
- Modifications to the existing Centrifuge Building

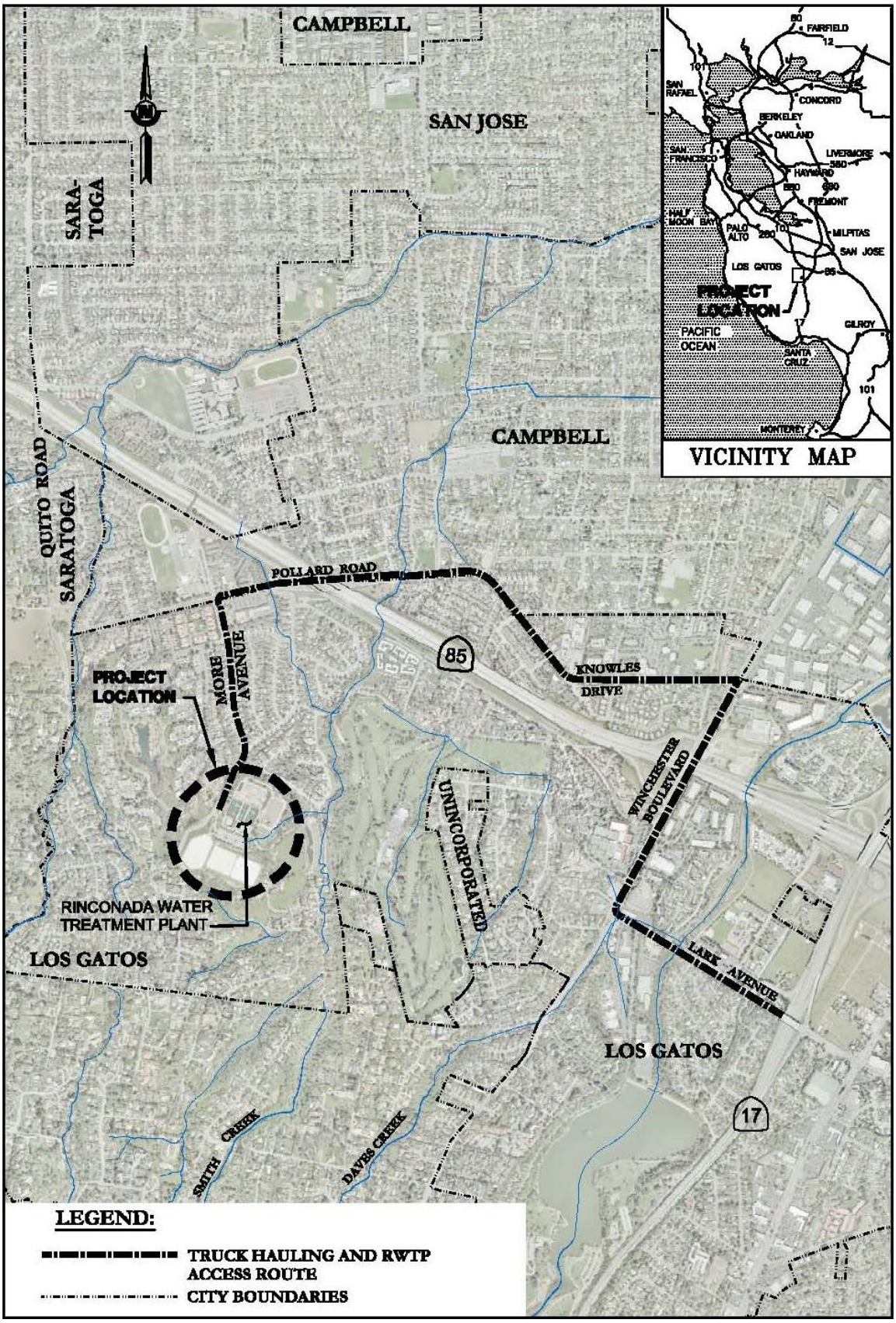
Table 2-1 below provides a comparison of the approved project (RMP) and the proposed modified project (RRP)

Table 2-1 RMP- RRP Project Elements Comparison

RMP – Project Description	RRP - Project Description
Installed two new gravity thickeners	Modifies the existing thickener inlet and outlet piping Replaces the existing gravity thickener equipment
Installed a centrifuge feed pump station	Removes existing feed pumps Installs new sludge transfer pumps in existing station Modifies the existing piping Installs four (4) new centrifuge feed pumps at a new location within the existing project footprint
Installed a new centrifuge building	Modifies the existing Centrifuge Building interior equipment and piping
Installed a new loadout structure and conveyor system	Modifies the existing loadout structure and conveyors Installs new platforms and additional

RMP – Project Description	RRP - Project Description
	conveyors
Installed solids drive through area	No changes
Modified the existing washwater recovery basins	Demolishes existing north washwater recovery basin and structural backfill Demolishes the existing return pump and basin piping
Installed yard piping	Modifies to the existing yard piping Installs additional yard piping
Electrical and instrumentation conduits	Modifies the existing electrical supply and control system
Installed a new 15,000-gallon sludge mixing tank	Demolishes the existing sludge mixing tank Installs two (2) new 450,000-gallon concrete sludge storage/mixing tanks
Abandoned the existing equipment in the existing Belt Press Building	Re-uses existing Belt Press Building and modifies the interior structure by installing two (2) new additional centrifuges and a new polymer system.

Figure 2.1 - Project Vicinity Map



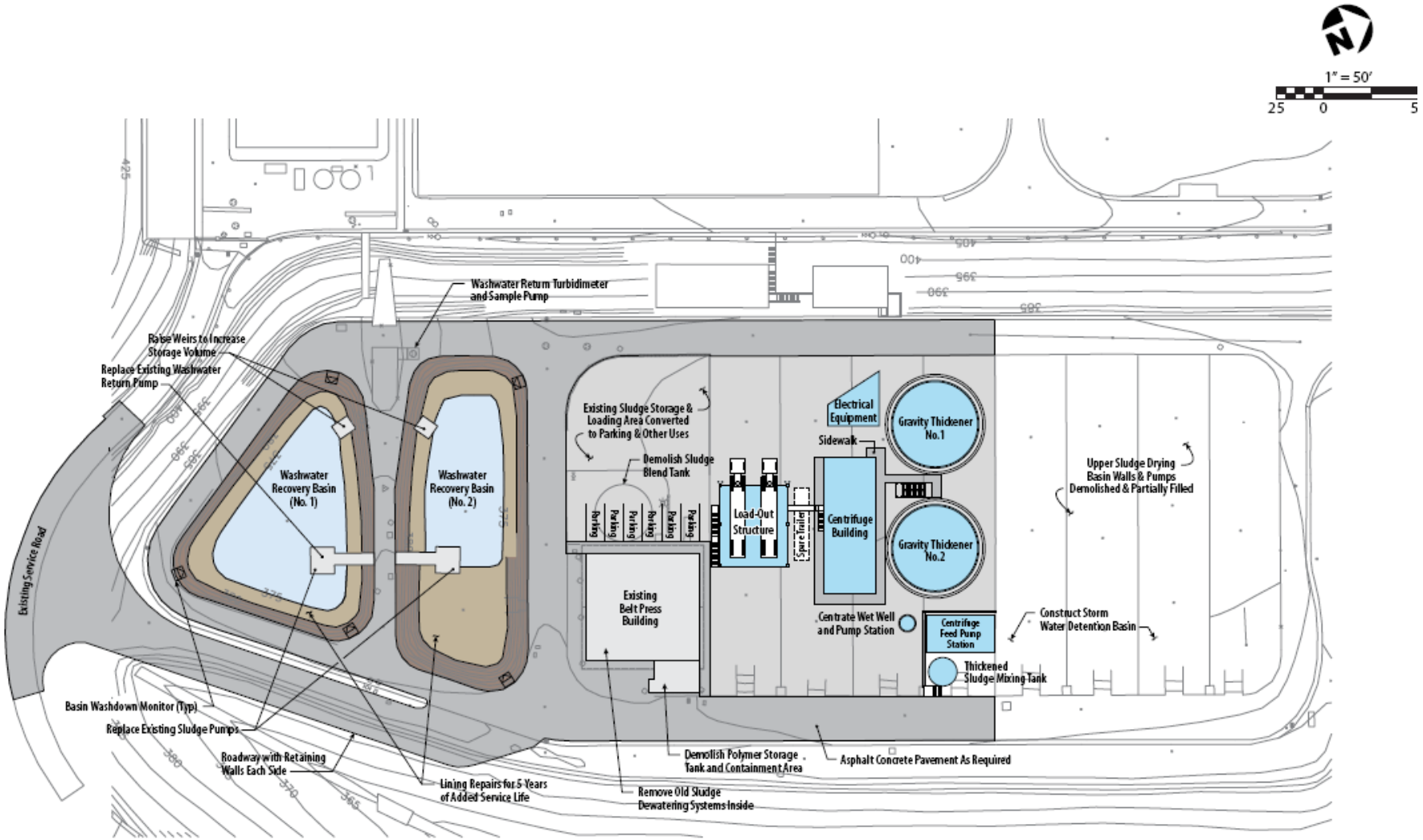


Figure 2.2 - Residuals Management Project (Approved Project) Site Plan

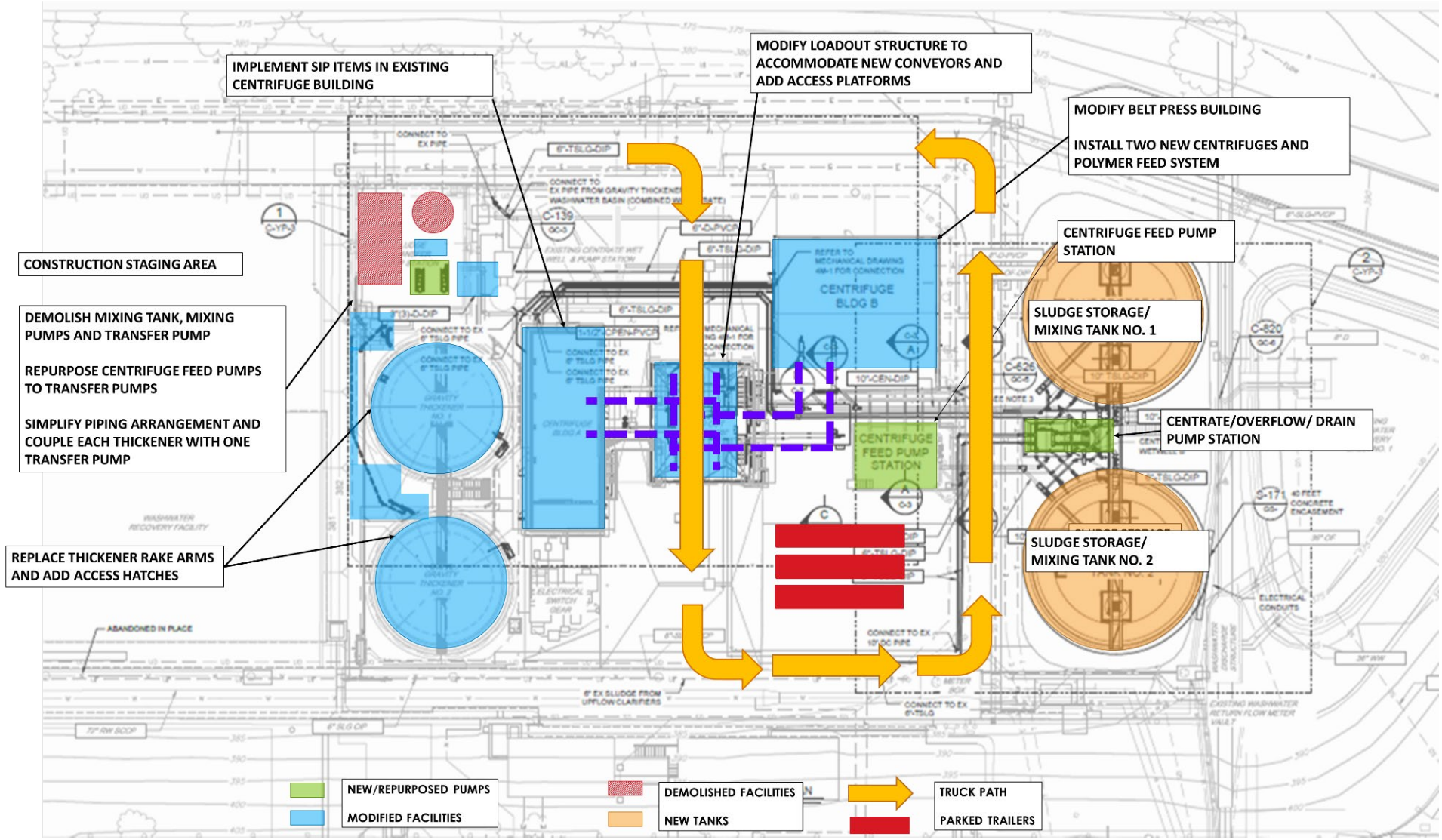


Figure 2.3- Proposed Modified Project Site Layout

Proposed Construction Activities

Excavation and Backfill

The existing RWTP site is fully developed in the locations where the RMP project improvements were constructed, and excavation is necessary only for new construction. This includes construction of a new sludge storage/mixing tank and new underground piping between project components. An existing washwater recovery basin will be filled in to provide a foundation for a second sludge storage/mixing tank.

Based on previous work, the soils in this area are expected to be stable for shallow excavations. Temporary slopes up to 1 horizontal to 1 vertical (1:1) are anticipated to be feasible for areas consisting primarily of clay materials. Slopes in sand and gravel areas will be use 1.5 horizontal to 1 vertical (1.5:1). Care will be taken near existing structures, utilities, and pipelines to prevent undermining of existing support systems. Vertical shoring will be utilized, where appropriate, adjacent to existing structures and sidewalls.

The dimensions of the new storage/mixing tanks are estimated to be approximately 62 feet in diameter and 25 feet in height. They will be installed on a filled portion of what is currently an asphalt-lined washwater recovery basin. All work will be conducted on existing paved roads and water treatment facilities. Pipe zone backfill will consist of imported material meeting the gradation requirements of structural fill. Native soils are not anticipated to be suitable for use as pipe zone backfill. Since the majority of the work area will be paved for vehicular traffic, trench zone backfill will also consist of material meeting the gradation requirements for structural fill.

Grading and Drainage

In general, overall site grading and drainage is not anticipated to be substantially changed as part of the work. Surface runoff will be directed away from new structures by sloping the ground surface away from these facilities, where practical. In these areas, minor modifications to existing site drainage paths will be necessary to compensate for areas where structures are added that dd not previously exist. The largest change will be the filling of existing Washwater Recovery Basin No. 2 as part of the construction of a new sludge storage/mixing tank. The access road on the north side of the existing Washwater Recovery Basin will be retained as part of the truck haul path for cake loading and removal.

A sump with sump pumps will be provided for recycling centrate from the new centrifuges and overflow/draining of the sludge storage/mixing tanks. These sump pumps will be designed to pump automatically based on a signal from a level switch and remove accumulated water from the tanks in the event of an accidental overflow or when a tank needs to be drained completely. Sump pumps will discharge to the new washwater recovery basins or the sludge thickeners.

Paving

In the residuals area, the existing condition is primarily asphalt surfacing and concrete slabs around the solids handling facilities. The plan is to retain the existing surfacing wherever possible. Paving will be removed and replaced in kind in areas where excavation will require removal of existing asphalt or concrete. Damaged access roads will be repaired or repaved at the end of the project.

Staging, Work Areas, and Equipment

Construction of the RRP would primarily occur in the southeastern portion of the existing Plant. A staging area would be located adjacent to the existing facilities to the east of the new washwater recovery basins. The staging area would not require any improvements and would be accessed from More Avenue using the Plant's existing service roads. Workers would park up to 6 crew trucks and/or passenger vehicles and all equipment in the staging area. The staging area could also be used for stockpiling of materials.

Equipment that would be used for construction of the project would include an excavator, crane, compactor, and trucks such as water trucks, haul trucks for materials delivery, and concrete trucks. All equipment would be stored and maintained at the staging area when not in use.

Site Access

Access to the construction site would be limited to a designated haul route. Trucks would travel on State Route (SR-) 17, Lark Avenue, Winchester Boulevard, Knowles Drive, Pollard Road, and More Avenue. No residential streets beyond those indicated would be utilized for construction access purposes.

Construction Schedule

Construction of the proposed modified project would occur concurrently with the RIP. Construction is expected to begin in mid-2021 and continue into late 2022. Construction activities will be phased and timed to occur such that Plant operations are not impacted.

Work Shifts and Hours

Normal work hours and days for indoor and outdoor work (which include truck hauling, site preparation, and construction) will be 7:00 a.m. to 6:00 p.m. Monday through Friday and 8:00 a.m. to 5:00 p.m on Saturdays. However, construction would occur only between 8:00 am to 6:00 pm on Monday through Friday and on Saturdays (if needed) between 9:00 am and 4:00 pm. No construction will be allowed on Sundays or holidays or from Monday to Saturday outside the above-specified hours without prior approval by the Town of Los Gatos and written authorization by Valley Water.

Treatment Plant Shutdown Windows

The RWTP must be able to produce up to 80 million gallons per day (mgd) at all times between March 16 and November 14 every year. From November 15 to March 15, the Plant must be able to produce up to 40 mgd. Unless approved by Valley Water, complete shutdowns of the Residuals Management System generally will be not be allowed between March 16 and November 14, and allowed only on Fridays, Saturdays, and Sundays between November 15 and March 15. Partial shutdowns will be allowed on a case-by-case basis. For example, a single thickener may be taken out of service for rehabilitation or modification for extended periods between November 15 and March 15. However, one thickener must remain in service at all times, unless the entire Plant is out of service. Other requirements related to the shutdown windows and limitations will be developed and incorporated in the project specifications.

Project Implementation Schedule

Once the proposed modified project is approved, bidding and contractor award would follow, and construction Notice to Proceed (NTP) is expected to be issued in early 2021. The preliminary construction schedule is based on the NTP, shutdown windows described above, scope of the system improvements, constraints of the RIP, and stated vendor submittal and equipment delivery schedules.

Based on the current schedule, if the contractor performs the work in a timely manner and receives the equipment on schedule, the Belt Press Building conversion, sludge storage/mixing tanks, the centrifuge feed pumps rehabilitation of the thickeners, and thickener piping modifications could be completed and available for use by mid-March 2022 at the end of the first shutdown window. Remediation work in the existing centrifuge building, and demolition of the existing sludge mix tank and mix pumps could be completed between mid-March 2022 and end of July 2022.

Construction Sequence

Consistent with the construction schedule a preliminary sequence of construction was developed. It is divided into three segments coinciding with the 80 mgd and 40 mgd production periods.

Figure 2.4 depicts the scope of improvements in the RRP. **Figures 2.5 through 2.7** show the anticipated sequence of work during each of the project segments from issuance of the NTP to project closeout.

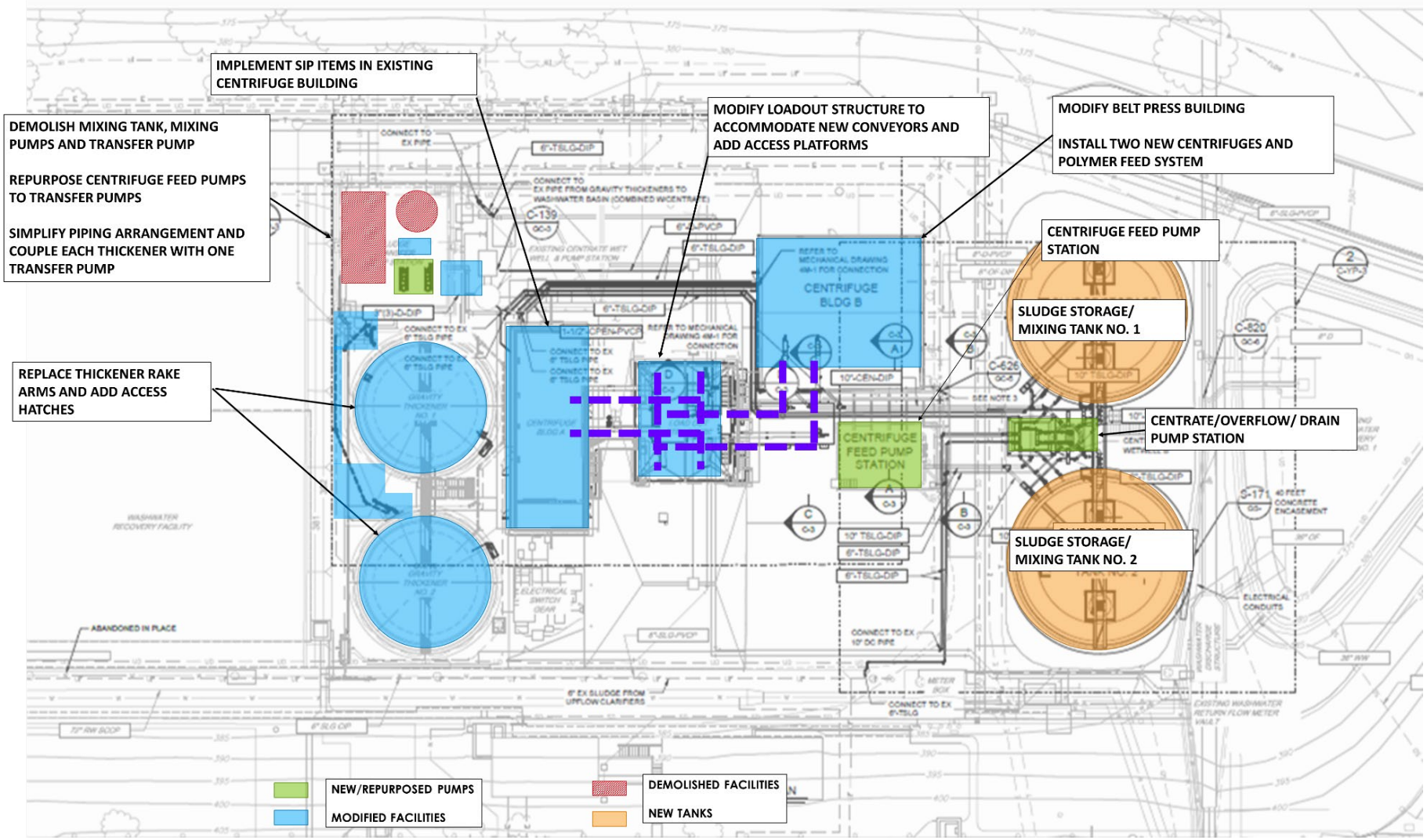


Figure 2.4 – Scope of Improvement for the RRP

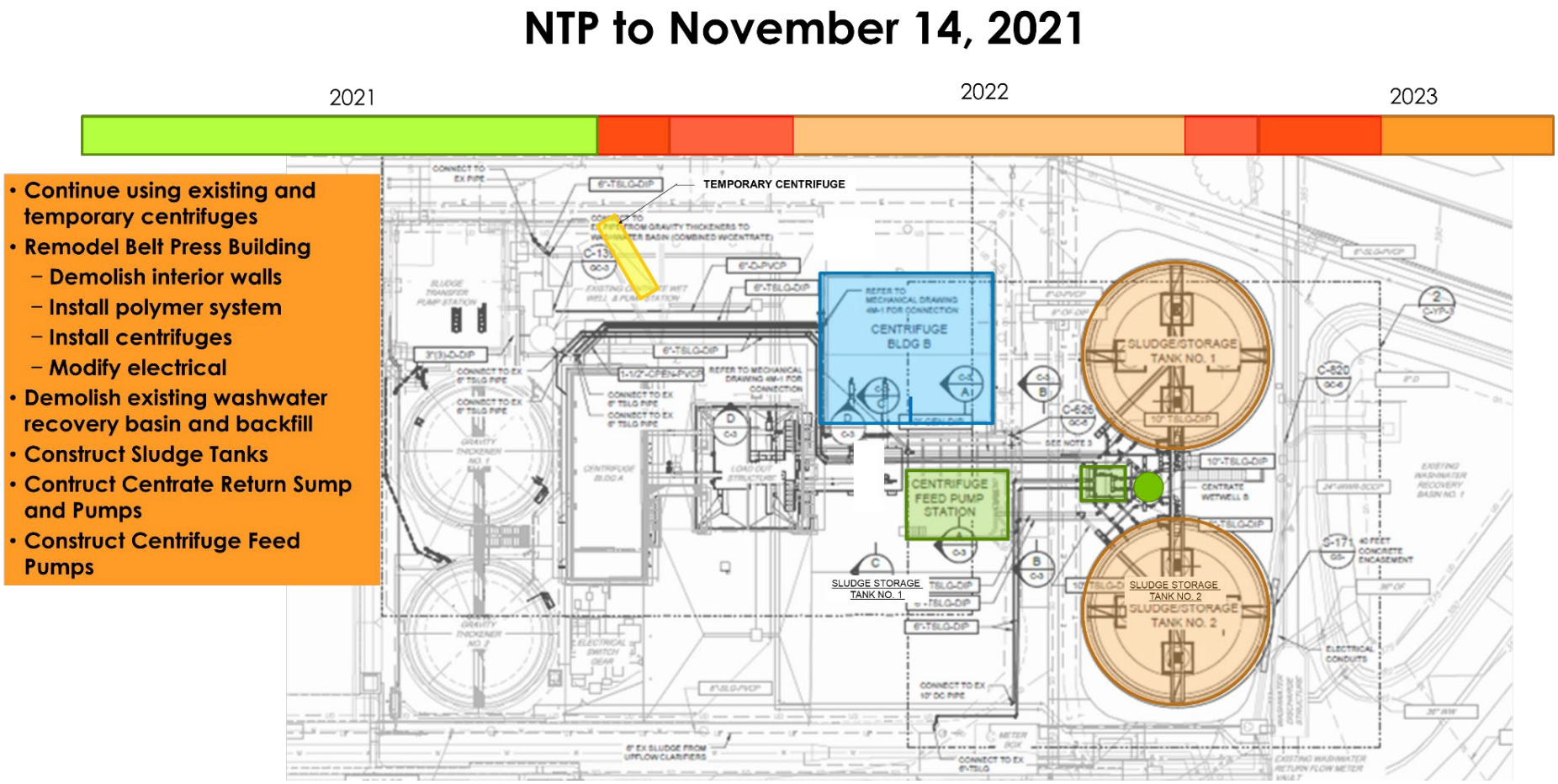


Figure 2.5 - Construction Segment 1

November 15, 2021, to March 15, 2022

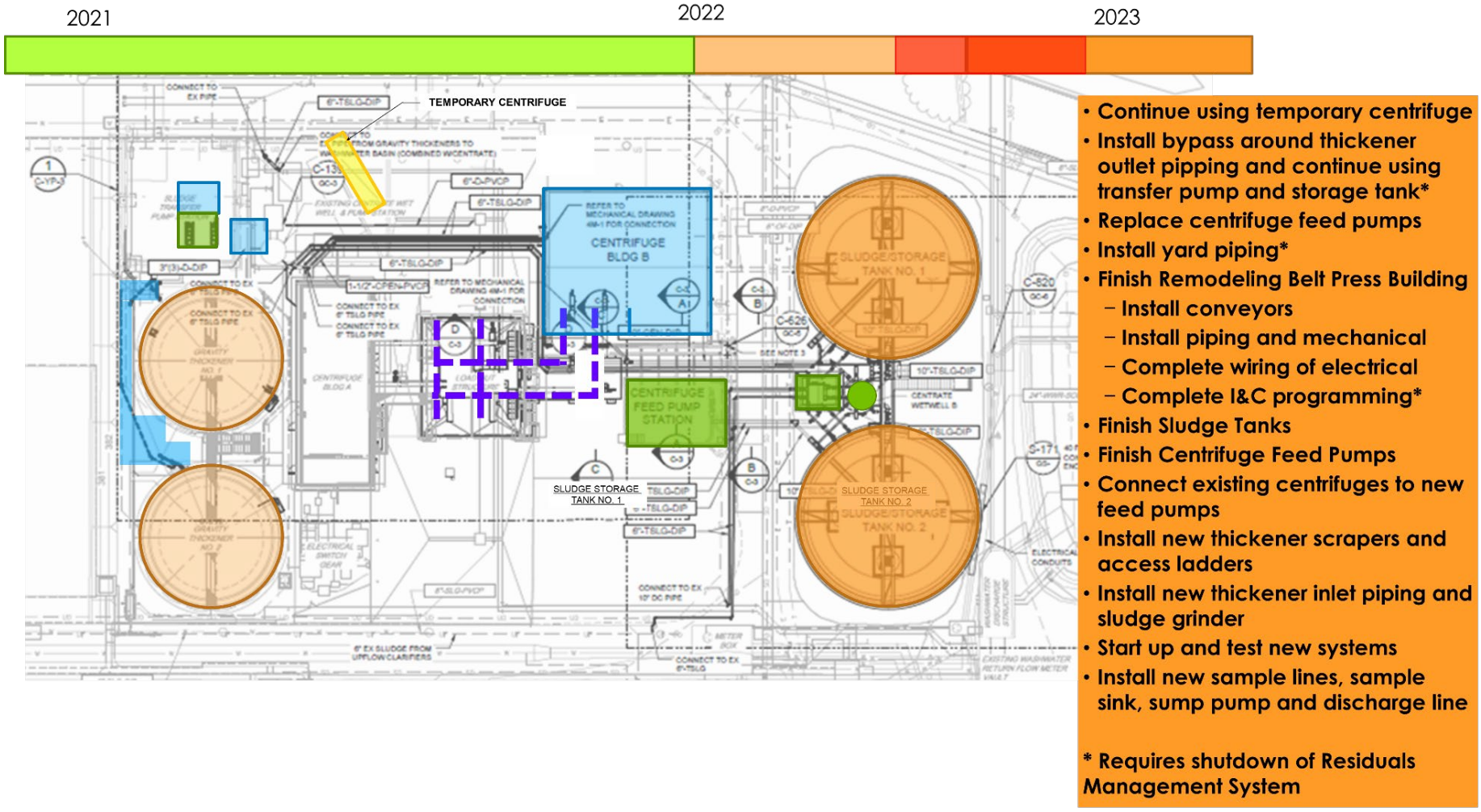


Figure 2.6 – Construction Segment 2

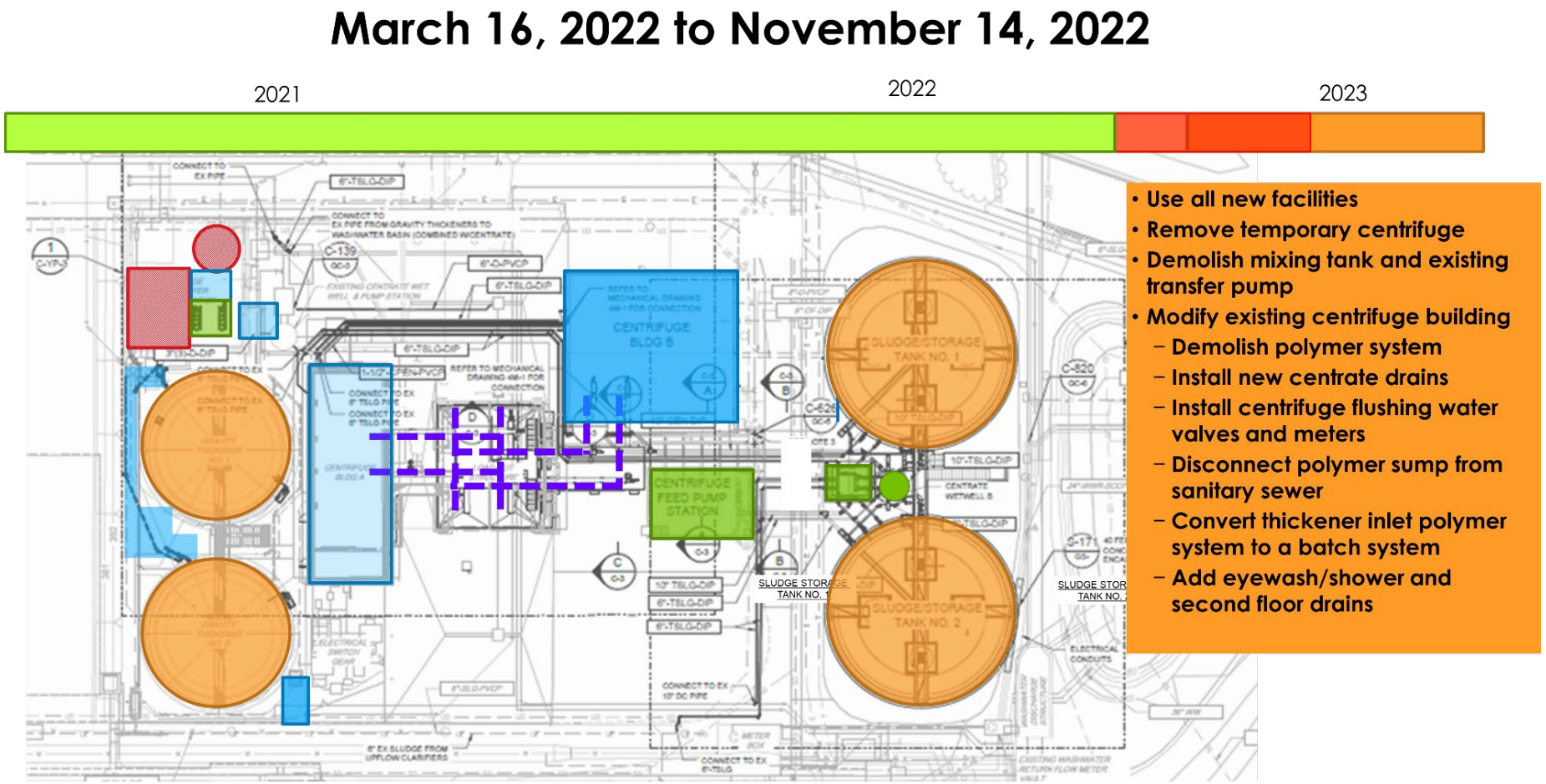


Figure 2.7 – Construction Segment 3

Best Management Practices

Best Management Practices (BMPs) are practices that prevent, avoid, or minimize potentially adverse effects associated with construction and other activities. Valley Water routinely incorporates a wide range of BMPs into project design as described in detail in its *Best Management Practices Handbook* (Valley Water 2014). The BMPs, as summarized in Table 2.2**,** will be incorporated into the construction documents (plans and specifications) so contractors employed on the proposed modified project will be contractually required to adhere to them.

Table 2.2 Best Management Practices for Construction Activities

Air Quality	
AQ-1 **Use Dust Control Measures**	The following Bay Area Air Quality Management District (BAAQMD) Dust Control Measures will be implemented: 1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. 2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. 4. Water used to wash the various exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, etc.) will not be allowed to enter waterways. 5. All vehicle speeds on unpaved roads shall be limited to 15 mph. 6. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. 7. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations), and this requirement shall be clearly communicated to construction workers (such as verbiage in contracts and clear signage at all access points). 8. All construction equipment shall be maintained and properly tuned in accordance with manufacturer‘s specifications, and all equipment shall be checked by a certified visible emissions evaluator. 9. Correct tire inflation shall be maintained in accordance with manufacturer‘s specifications on wheeled equipment and vehicles to prevent excessive rolling resistance. 10. Post a publicly visible sign with a telephone number and contact person at the lead agency to address dust complaints; any complaints shall be responded to and take corrective action within 48 hours. In addition, a BAAQMD telephone number with any applicable regulations will be included.
AQ-2	Materials with decaying organic material, or other potentially odorous materials, will be handled in a manner that avoids impacting residential areas and other sensitive

Avoid Stockpiling Odorous Materials	receptors, including: 1. Avoid stockpiling potentially odorous materials within 1,000 feet of residential areas or other odor sensitive land uses. 2. Dispose of Odorous stockpiles at an appropriate landfill.
Biological Resources	
BI-5 **Avoid Impacts to Nesting Migratory Birds**	Nesting birds are protected by state and federal laws. Valley Water will protect nesting birds and their nests from abandonment, loss, damage, or destruction. Nesting bird surveys will be performed by a qualified biologist prior to any activity that could result in the abandonment, loss, damage, or destruction of birds, bird nests, or nesting migratory birds. Inactive bird nests may be removed with the exception of raptor nests. Birds, nests with eggs, or nests with hatchlings will be left undisturbed.
BI-6 **Avoid Impacts to Nesting Migratory Birds from Pending Construction**	Nesting exclusion devices may be installed to prevent potential establishment or occurrence of nests in areas where construction activities would occur. All nesting exclusion devices will be maintained throughout the nesting season or until completion of work in an area makes the devices unnecessary. All exclusion devices will be removed and disposed of when work in the area is complete.
BI-10 **Avoid Animal Entry and Entrapment**	All pipes, hoses, or similar structures less than 12 inches diameter will be closed or covered to prevent animal entry. All construction pipes, culverts, or similar structures, greater than 2-inches diameter, stored at a construction site overnight, will be inspected thoroughly for wildlife by a qualified biologist or properly trained construction personnel before the pipe is buried, capped, used, or moved. If inspection indicates presence of sensitive or state or federally-listed species inside stored materials or equipment, work on those materials will cease until a qualified biologist determines the appropriate course of action. To prevent entrapment of animals, all excavations, steep-walled holes or trenches more than 6-inches deep will be secured against animal entry at the close of each day. Any of the following measures may be employed, depending on the size of the hole and method feasibility: 1. Hole to be securely covered (no gaps) with plywood, or similar materials, at the close of each working day, or any time the opening will be left unattended for more than one hour. 2. In the absence of covers, the excavation will be provided with escape ramps constructed of earth or untreated wood, sloped no steeper than 2:1, and located no farther than 15 feet apart. 3. In situations where escape ramps are infeasible, the hole or trench will be surrounded by filter fabric fencing or a similar barrier with the bottom edge buried to prevent entry.
BI-11 **Minimize Predator-Attraction**	Remove trash daily from the worksite to avoid attracting potential predators to the site.

Cultural Resources	
CU-1 **Accidental Discovery of Archaeological Artifacts, Tribal Cultural Resources, or Burial Remains**[2]	If historical or unique archaeological artifacts, or tribal cultural resources, are accidentally discovered during construction, work in affected areas will be restricted or stopped until proper protocols are met. Work at the location of the find will halt immediately within 100 feet of the find. A "no work" zone shall be established utilizing appropriate flagging to delineate the boundary of this zone. A Consulting Archaeologist will visit the discovery site as soon as practicable for identification and evaluation pursuant to Section 21083.2 of the Public Resources Code and Section 15126.4 of the California Code of Regulations. If the archaeologist determines that the artifact is not significant, construction may resume. If the archaeologist determines that the artifact or resource is significant, the archaeologist will determine if the artifact or resource can be avoided and, if so, will detail avoidance procedures. If the artifact cannot be avoided, the archaeologist will develop within 48 hours an Action Plan which will include provisions to minimize impacts and, if required, a Data Recovery Plan for recovery of artifacts in accordance with Public Resources Code Section 21083.2 and Section 15126.4 of the CEQA Guidelines. If a tribal cultural resource cannot be avoided, the action Plan will include notification of the appropriate Native American tribe, and consultation with the tribe regarding acceptable recovery options. If burial finds are accidentally discovered during construction, work in affected areas will be restricted or stopped until proper protocols are met. Upon discovering any burial site as evidenced by human skeletal remains, the County Coroner will be immediately notified and the field crew supervisor shall take immediate steps to secure and protect such remains from vandalism during periods when work crews are absent. No further excavation or disturbance within 100 feet of the site or any nearby area reasonably suspected to overlie adjacent remains may be made except as authorized by the County Coroner, California Native American Heritage Commission, and/or the County Coordinator of Indian Affairs.
Hazards & Hazardous Materials	
HM-7 **Restrict Vehicle and Equipment Cleaning to Appropriate Locations**	Vehicles and equipment may be washed only at approved areas. No washing of vehicles or equipment will occur at job sites.

[2] This BMP has been updated from BMP CU-1 in Valley Water's BMP Handbook (2014) to provide more protective measures to avoid and minimize potential impacts on archeological artifacts, tribal cultural resources, and burial remains, consistent with the approach taken in other recent Valley Water projects.

HM-8 **Ensure Proper Vehicle and Equipment Fueling and Maintenance**	No fueling or servicing will be done in a waterway or immediate flood plain, unless equipment stationed in these locations is not readily relocated (i.e., pumps, generators). 1. For stationary equipment that must be fueled or serviced on-site, containment will be provided in such a manner that any accidental spill will not be able to come in direct contact with soil, surface water, or the storm drainage system. 2. All fueling or servicing done at the job site will provide containment to the degree that any spill will be unable to enter any waterway or damage riparian vegetation. 3. All vehicles and equipment will be kept clean. Excessive build-up of oil and grease will be prevented. 4. All equipment used in the creek channel will be inspected for leaks each day prior to initiation of work. Maintenance, repairs, or other necessary actions will be taken to prevent or repair leaks, prior to use. 5. If emergency repairs are required in the field, only those repairs necessary to move equipment to a more secure location will be done in a channel or flood plain.
HM-9 **Ensure Proper Hazardous Materials Management**	Measures will be implemented to ensure that hazardous materials are properly handled and the quality of water resources is protected by all reasonable means. 1. Prior to entering the work site, all field personnel will know how to respond when toxic materials are discovered. 2. Contact of chemicals with precipitation will be minimized by storing chemicals in watertight containers with appropriate secondary containment to prevent any spillage or leakage. 3. Petroleum products, chemicals, cement, fuels, lubricants, and non-storm drainage water or water contaminated with the aforementioned materials will not contact soil and not be allowed to enter surface waters or the storm drainage system. 4. All toxic materials, including waste disposal containers, will be covered when they are not in use, and located as far away as possible from a direct connection to the storm drainage system or surface water. 5. Quantities of toxic materials, such as equipment fuels and lubricants, will be stored with secondary containment that is capable of containing 110% of the primary container(s). 6. The discharge of any hazardous or non-hazardous waste as defined in Division 2, Subdivision 1, Chapter 2 of the California Code of Regulations will be conducted in accordance with applicable State and federal regulations. 7. In the event of any hazardous material emergencies or spills, personnel will call the Chemical Emergencies/Spills Hotline at 1-800-510-5151.

HM-10 **Utilize Spill Prevention Measures**	Prevent the accidental release of chemicals, fuels, lubricants, and non-storm drainage water following these measures: 1. Field personnel will be appropriately trained in spill prevention, hazardous material control, and clean-up of accidental spills. 2. Equipment and materials for cleanup of spills will be available on site, and spills and leaks will be cleaned up immediately and disposed of according to applicable regulatory requirements. 3. Field personnel will ensure that hazardous materials are properly handled and natural resources are protected by all reasonable means. 4. Spill prevention kits will always be in close proximity when using hazardous materials (e.g., at crew trucks and other logical locations), and all field personnel will be advised of these locations. 5. The work site will be routinely inspected to verify that spill prevention and response measures are properly implemented and maintained.
HM-12 **Incorporate Fire Prevention Measures**	1. All earthmoving and portable equipment with internal combustion engines will be equipped with spark arrestors. 2. During the high fire danger period (April 1–December 1), work crews will have appropriate fire suppression equipment available at the work site. 3. An extinguisher shall be available at the project site at all times when welding or other repair activities that can generate sparks (such as metal grinding) is occurring. 4. Smoking shall be prohibited except in designated staging areas and at least 20 feet from any combustible chemicals or vegetation.
HM-13 **Avoid Impacts from Naturally Occurring Asbestos**	Valley Water will comply with and implement BAAQMD dust control measures and notification requirements when working in serpentine soils.
Hydrology/Water Quality	
WQ-3 **Limit Impact of Pump and Generator Operation and Maintenance**	Pumps and generators will be maintained and operated in a manner that minimizes impacts to water quality and aquatic species. 1. Pumps and generators will be maintained according to manufacturers' specifications to regulate flows to prevent dry-back or washout conditions. 2. Pumps will be operated and monitored to prevent low water conditions, which could pump muddy bottom water, or high-water conditions, which creates ponding. 3. Pump intakes will be screened to prevent uptake of fish and other vertebrates. Pumps in steelhead creeks will be screened according to NMFS criteria. 4. Sufficient back-up pumps and generators will be onsite to replace defective or damaged pumps and generators.

WQ-4 **Limit Impacts from Staging and Stockpiling Materials**	1. To protect on-site vegetation and water quality, staging areas should occur on access roads, surface streets, or other disturbed areas that are already compacted and only support ruderal vegetation. Similarly, all equipment and materials (e.g., road rock and project spoil) will be contained within the existing service roads, paved roads, or other pre-determined staging areas. 2. Building materials and other project-related materials, including chemicals and sediment, will not be stockpiled or stored where they could spill into water bodies or storm drains. 3. No runoff from the staging areas may be allowed to enter water ways, including the creek channel or storm drains, without being subjected to adequate filtration (e.g., vegetated buffer, swale, hay wattles or bales, silt screens). 4. The discharge of decant water to water ways from any on-site temporary sediment stockpile or storage areas is prohibited. 5. During the wet season, no stockpiled soils will remain exposed, unless surrounded by properly installed and maintained silt fencing or other means of erosion control. During the dry season; exposed, dry stockpiles will be watered, enclosed, covered, or sprayed with non-toxic soil stabilizers.
WQ-5 **Stabilize Construction Entrances and Exits**	Measures will be implemented to minimize soil from being tracked onto streets near work sites: 1. Methods used to prevent mud from being tracked out of work sites onto roadways include installing a layer of geotextile mat, followed by a 4-inch thick layer of 1 to 3-inch diameter gravel on unsurfaced access roads. 2. Access will be provided as close to the work area as possible, using existing ramps where available and planning work site access so as to minimize disturbance to the water body bed and banks, and the surrounding land uses.
WQ-11 **Maintain Clean Conditions at Work Sites**	The work site, areas adjacent to the work site, and access roads will be maintained in an orderly condition, free and clear from debris and discarded materials on a daily basis. Personnel will not sweep, grade, or flush surplus materials, rubbish, debris, or dust into storm drains or waterways. For activities that last more than one day, materials or equipment left on the site overnight will be stored as inconspicuously as possible and will be neatly arranged. Any materials and equipment left on the site overnight will be stored to avoid erosion, leaks, or other potential impacts to water quality Upon completion of work, all building materials, debris, unused materials, concrete forms, and other construction-related materials will be removed from the work site.
WQ-15 **Prevent Water Pollution**	Oily, greasy, or sediment laden substances or other material that originate from the project operations and may degrade the quality of surface water or adversely affect aquatic life, fish, or wildlife will not be allowed to enter, or be placed where they may later enter, any waterway. The project will not increase the turbidity of any watercourse flowing past the construction site by taking all necessary precautions to limit the increase in turbidity as follows: 1. where natural turbidity is between 0 and 50 Nephelometric Turbidity Units (NTU), increases will not exceed 5 percent.

	2. where natural turbidity is greater than 50 NTU, increases will not exceed 10 percent. 3. where the receiving water body is a dry creek bed or storm drain, waters in excess of 50 NTU will not be discharged from the project. Water turbidity changes will be monitored. The discharge water measurements will be made at the point where the discharge water exits the water control system for tidal sites and 100 feet downstream of the discharge point for non-tidal sites. Natural watercourse turbidity measurements will be made in the receiving water 100 feet upstream of the discharge site. Natural watercourse turbidity measurements will be made prior to initiation of project discharges, preferably at least 2 days prior to commencement of operations.
WQ-16 **Prevent Stormwater Pollution**	To prevent stormwater pollution, the applicable measures from the following list will be implemented: 1. Soils exposed due to project activities will be seeded and stabilized using hydroseeding, straw placement, mulching, and/or erosion control fabric. These measures will be implemented such that the site is stabilized, and water quality protected prior to significant rainfall. In creeks, the channel bed and areas below the Ordinary High-Water Mark are exempt from this BMP. 2. The preference for erosion control fabrics will be to consist of natural fibers; however, steeper slopes and areas that are highly erodible may require more structured erosion control methods. No non-porous fabric will be used as part of a permanent erosion control approach. Plastic sheeting may be used to temporarily protect a slope from runoff, but only if there are no indications that special-status species would be impacted by the application. 3. Erosion control measures will be installed according to manufacturer's specifications. 4. To prevent stormwater pollution, the appropriate measures from, but not limited to, the following list will be implemented: • Silt Fences • Straw Bale Barriers • Brush or Rock Filters • Storm Drain Inlet Protection • Sediment Traps or Sediment Basins • Erosion Control Blankets and/or Mats • Soil Stabilization (i.e. tackified straw with seed, jute or geotextile blankets, etc.) • Straw mulch.

	5. All temporary construction-related erosion control methods shall be removed at the completion of the project (e.g. silt fences). 6. Surface barrier applications installed as a method of animal conflict management, such as chain link fencing, woven geotextiles, and other similar materials, will be installed no longer than 300 feet, with at least an equal amount of open area prior to another linear installation.
WQ-17 Manage Sanitary and Septic Waste	Temporary sanitary facilities will be located on jobs that last multiple days, in compliance with California Division of Occupational Safety and Health (Cal/OSHA) regulation 8 California Code of Regulations 1526. All temporary sanitary facilities will be located where overflow or spillage will not enter a watercourse directly (overbank) or indirectly (through a storm drain).
Transportation/Traffic	
TR-1 Incorporate Public Safety Measures	Fences, barriers, lights, flagging, guards, and signs will be installed as determined appropriate by the public agency having jurisdiction, to give adequate warning to the public of the construction and of any dangerous condition to be encountered as a result thereof.

Section 3 Environmental Setting

Project Location

The proposed modified project site is located at the RWTP at 400 More Avenue in the Town of Los Gatos (**Figure 2.1**). Proposed activities associated with the proposed modified project would occur entirely within approximately 3-acre of the southeastern segment of the Plant grounds.

Physical Environment

The Plant is located on approximately 39.6 acres in the foothills of the Santa Cruz Mountains. The terrain in the area consists of hills that support foothill chaparral, oak woodland, and annual grassland plant communities. Rivers and creeks in the area flow east toward the Santa Clara Valley and are mostly dry during the summer and early fall. The elevation at the site ranges from 446 feet at the More Avenue entrance to 286 feet at the Granada Way entrance.

The Plant is located within a residential area and is bounded by More Avenue to the west, Granada Way to the north, La Rinconada County Club golf course to the east, and residential housing to the south. Smith Creek, which originates upstream in the Santa Cruz Mountains, parallels the eastern boundary of the Plant property and continues downstream along the western edge of the Country Club golf course.

Much of the Plant is developed with buildings, parking lots, roads, water treatment and storage facilities, and other structures. Vegetation communities on the water treatment Plant grounds consist of coast live oak and blue oak woodlands, scattered eucalyptus trees within native and mixed scrublands, and landscaped areas.

Section 4 Environmental Evaluation

The 2013 IS/MND disclosed that construction and operation of the RMP would result in potentially significant impacts on resource areas relating to air quality/greenhouse gases, biological resources, noise, transportation/traffic, and utilities/service systems, but that BMPs and mitigation measures identified in the 2013 IS/MND would reduce these impacts to a less-than-significant level.

As the following detailed analysis shows, the proposed modified project would not result in any additional potentially significant impacts compared to the ones already identified in the 2013 IS/MND. For potential impacts to biological resources and noise, implementation of applicable BMPs (listed in Table 2-2) and the same applicable mitigation measures identified in the 2013 MND (described in more detailed in the analysis below) would ensure that the proposed modified project would not result in new significant impacts or a substantial increase in severity of these previously identified significant impacts. The 2013 IS/MND also concluded that the RMP would result in potentially significant impacts related to air quality, transportation/traffic, and utilities/service systems, but the analysis below concludes that the proposed modified project's impacts on air quality, transportation/traffic, and utilities/service systems would only be less than significant.

Table 4-1 summarizes the changes in the level of impacts between the approved RMP and the proposed modified project on those resource areas that the RMP MND had previously identified as potentially significant.

Table 4-1 2013 MND – 2021 Addendum Impact Comparison

Level of Impact (Approved Project based on 2013 MND)	Level of Impact (Proposed Modified Project based on this Addendum)
Noise (less than significant with mitigation) All noise and vibration impacts would be short-term, attributed to construction. Noise levels were estimated to be 73 dBA at the nearest home (less than the applicable construction noise limit of 85 dBA). Elevated noise levels could occur during construction. Mitigation Measure NOI-4 would reduce periodic increases of ambient noise levels to less than significant.	Noise (less than significant with mitigation) All noise and vibration impacts would be short-term, attributed to construction. The maximum calculated noise levels at the nearest home is estimated to be 72.1 dBA. (less than the applicable construction noise limit of 85 dBA). Elevated noise levels ranging in the "conditionally acceptable" range could occur during construction. Mitigation Measure NOI-4 would reduce increases of noise levels to less than significant. In addition, the noise impact from the proposed modified project would not substantially increase.
Air Quality (less than significant with mitigation) Criteria pollutant emissions would all be associated with construction activities; daily emissions would all be below the BAAQMD thresholds. Greenhouse gas emissions were considered potentially significant. Implementation of	Air Quality (less than significant) Criteria pollutant emissions would all be associated with construction activities; daily emissions would be below the BAAQMD thresholds. Greenhouse gas emissions would be less than significant.

Mitigation Measure AQ-6 would reduce greenhouse gas emissions to less than significant.	
<u>Biological Resources (less than significant with mitigation) – special-species and tree impacts</u> Impacts could occur due to habitat disruption of San Francisco dusky-footed woodrat nests, impacts to the western ponds turtle and migratory birds. Mitigation measures Bio-1.1, Bio-1.2, and Bio -1.3 would reduce impacts to these species to less than significant. Tree removal would be required due to trenching and installation of duct bank and conduit and roadway construction. Mitigation measure Bio-5 would reduce impacts from tree removal to less than significant.	<u>Biological Resources (less than significant with mitigation) – special-status species impacts, but no tree impacts</u> Impacts could occur to special-status species (San Francisco dusky-footed woodrat) and migratory birds. Mitigation measures Bio-1.1, and Bio-1.2 would reduce impacts to these species to less than significant. No additional trees would be removed to construct the proposed modified project. Thus, the proposed modified project would not result in any new impacts on trees. No mitigation measure is required.
<u>Traffic (less than significant with mitigation)</u> Increase in traffic due to construction-related vehicles during the 28-month work period (estimated 40 commute trips and 10 midday trips for construction personnel and 40 one-way truck trips per day, up to 6 trucks per hour over 7-hour haul and delivery period). Construction-related traffic would be temporary, and Mitigation Measure TR-2 would reduce impacts to less than significant. No increase in long-term traffic (identical to current operation and maintenance).	<u>Traffic (Less than significant impact)</u> Increase in traffic due to construction-related vehicles during the 18-month construction duration (estimated 6 commute trips and periodic truck trips such as dump trucks and haul trucks over 10-hour daily construction period). Slight increase in long-term traffic, up to 200 additional yearly haul trips over existing conditions, maximum up to two daily trips, which is less than the 110 daily trips threshold established under SB 743.

DETERMINATION:

An addendum to the 2013 IS/MND is the appropriate level of document for the proposed modified project.

The proposed modified project elements would not substantially change the size of the project area or the existing operation of the Plant. Changes to the environmental impacts that would result from construction activities and operation are identified and compared to the level of environmental impact described in the 2013 Final IS/MND and are discussed below. The discussion below is organized by topic area, as it was in the 2013 IS/MND. Based on the analysis, the proposed modified project would not result in any new significant impact or a substantial increase in severity of a previously identified significant impact. No additional mitigation measures beyond those applicable mitigation measures included in the 2013 IS/MND would be necessary.

Aesthetics

No designated scenic vistas of regional importance are identified in the Santa Clara County or Los Gatos general plans, and no designated scenic routes are present in the project vicinity. Since there are no designated scenic vistas within the project area, the proposed modified project would not have an effect on a scenic vista.

Within Santa Clara County, SR-9 west of SR-17 is a designated state scenic highway (Caltrans 2019). At its nearest point, Highway 9 is approximately 1.3 miles south of the project area. The project would not be visible from this highway. Interstate 280 north of Highway 17 and Highway 17 south of Highway 9 are eligible state scenic highways. However, these roadways are respectively located approximately 4.2 miles and 2.1 miles from the project area, and views of the proposed modified project are not available from these roadways. There are no Designated or Eligible State Scenic Highways within the project viewshed; therefore, the proposed modified project would not affect scenic resources within a state scenic highway.

Proposed construction activities and improvements would not be visible from public locations, such as those along More Avenue and Granada Way. New facilities would not be noticeable from public or residential viewpoints after construction. Building construction methods, materials, and colors would match existing structures as closely as possible to provide a uniform and cohesive aesthetic; therefore, these changes would not significantly impact the visual character or quality of the site given the developed nature of the immediate area (existing WTP facilities).

Additionally, proposed changes would not obstruct views from surrounding properties of the valley, mountains, and surrounding habitat. The new structures would not protrude above the natural ridgeline or otherwise alter its natural contour. In light of the limited visibility of proposed construction activity and facilities, the aesthetic impacts of the proposed modified project are considered less than significant.

Nighttime lighting of proposed facilities would be designed consistent with current practices to control fugitive light and glare while maintaining safety and compliance with applicable standards. Lighting would be low intensity, and to the extent possible would be directed downward, shielded, and oriented such that no light source would be directly visible from neighboring residential areas. Proposed facilities would not create a new source of substantial light that would adversely affect views in the area. Impacts related to lighting are considered less than significant.

As discussed above, the proposed modified project would not create a new source of substantial glare given the developed nature of the immediate area (existing WTP facilities and operations). Additionally, new facilities would not be noticeable from public or residential viewpoints. Based on the consistency of site design and use, and the lack of visibility, impacts related to glare are considered less than significant.

Agricultural 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 Department 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.

The proposed modified project site is located within an operating WTP. The site is surrounded by residential and open space uses. The site is designated by the California Department of Conservation as Urban and Built-up Land (CDC 2009). The site does not include active agricultural uses, nor is the site zoned for agricultural land use or a Williamson Act contract (Los Gatos 2011). The proposed modified project would not have any effect upon existing agricultural operations because there are none in the vicinity of the project.

The proposed modified project site does not meet the definition of forest land, timberland, or timberland zoned Timberland Production as specified in the applicable Public Resource and Governments Codes. The site does not include active forest land or timberland uses, nor is the site zoned for forest land use or timberland production (Los Gatos 2011). The proposed modified project would not have any effect on agricultural, forest land, or timber land uses because there are none in the vicinity of the project.

The proposed modified project would not contribute directly or indirectly to conversion of farmland to nonagricultural use, or conflict with zoning or Williamson Act contracts.

Air Quality and Greenhouse Gases

Air quality is determined primarily by the type and amount of contaminants emitted into the atmosphere, the size and topography of the San Francisco Bay Area Air Basin (**SFBAAB**), and its meteorological conditions. Atmospheric conditions such as wind speed, wind direction, and air temperature gradients, along with local topography, provide the link between air pollution emissions and air quality.

On-road Mobile Sources

On-road mobile sources consist of employee and vendor vehicle trips. The number of vehicle trips varies by month depending on which construction phases are active, which affects the number of employees and materials delivery. Table 4-2, below, includes trip estimates for each phase of construction.

Table 4.2 Proposed Modified Project On-road Vehicle Trips by Phase

Phase	Worker Trips	Vendor Trips	Hauling Trips	Worker Trip Length	Vendor Trip Length	Hauling Trip Length
Project Management	22	0	0	10.8	7.3	20
Tank 1 Excavation	3	0	100	10.8	7.3	20
Install Slab and walls	22	8	0	10.8	7.3	20
Centrifuge Feed Pump Excavation	3	0	10	10.8	7.3	20
Underground Piping	3	0	15	10.8	7.3	20
Sludge Tank 1 Backfill	10	0	20	10.8	7.3	20

Sludge Transfer PS and Electrical Mods	3	0	30	10.8	7.3	20
Centrifuge Building Drainpipe Reroute	3	0	20	10.8	7.3	20
Tank 2 Excavation	10	0	100	10.8	7.3	20
Paving	18	0	0	10.8	7.3	20
Sludge Tank 2 Backfill	10	0	20	10.8	7.3	20

Construction Impacts Related to Air Pollutant Emissions and Odor

Similar to the emissions discussed in the 2013 IS/MND, the proposed modified project would generate air pollutants and dust during construction activities from the operation of off-road construction equipment and on-road vehicles for worker, vendor, and hauling trips. Modified project construction would result in emissions beyond what was originally presented in the 2013 IS/MND. **Tables 4.3 and 4.4** show the emissions that were estimated for the RMP project in the 2013 IS/MND compared to the BAAQMD thresholds, and **Table 4-5** shows the emissions that were estimated for the proposed modified project compared to the BAAQMD thresholds.

Table 4.3 Criteria Pollutant Emissions Estimates for RMP Project – 2013 IS/MND

	Criteria Pollutant Daily Emissions (lbs/day)				
Year	**ROG**	**NOx**	**PM10**	**PM2.5**	**CO**
2013 (before air quality BMPs)	3.74	52.93	2.07	1.95	23.56
2013 (with air quality BMPs)	3.74	18.64	0.17	0.16	23.56
2014 (before air quality BMPs)	48.63	41.02	1.93	1.80	20.41
2014 (with air quality BMPs)	48.63	22.61	0.47	0.43	20.41
BAAQMD Thresholds	54	54	82	54	N/A
Exceed Threshold?	No	No	No	No	N/A

Source: SCVWD, 2013

BMPs = best management practices

Table 4.4 Greenhouse Gas Emissions Estimates for RMP Project – 2013 IS/MND

Emission Source	**CO2e (MTCO2e/yr)**	Emission Source	**CO2e** (MTCO2e/yr)
2013 Total construction emissions	7,076	Total annual operational emissions	810
2014 Total construction emissions	5,455		
BAAQMD construction threshold	none	BAAQMD operational threshold	1,100
Exceed Threshold?	N/A	Exceed Threshold?	No

Source: SCVWD, 2013

Table 4.5 Emissions Estimates for Proposed Modified Project

Year	Units	ROG	NOx	PM10	PM2.5	CO	SOx	CO2e (MTCO2e/yr)
2021 annual	tons/year	0.3	2.7	0.2	0.1	2.6	0.0	383
2021 daily average[a]	lbs/day	2.7	21.3	1.4	1.1	20.5	0.0	--
2022 annual	tons/year	0.3	2.3	0.1	0.1	2.4	0.0	363
2022 daily average[a]	lbs/day	2.3	18.5	1.1	0.9	19.1	0.0	--
2023 annual	tons/year	0.3	2.0	0.1	0.1	2.3	0.0	333
2023 daily average[a]	lbs/day	2.0	16.0	1.0	0.8	17.9	0.0	--
BAAQMD Threshold	tons/year	10	10	15	10	10	10	1,100 [b]
BAAQMD Threshold	lbs/day	54	54	82	54	54	54	---
Exceed Threshold?		No	No	No	No	No	No	No

[a] = Based on 252 workdays per year.

[b] = The BAAQMD has not established a construction GHG threshold, therefore the operational thresholds of 1,100 $MTCO_2e$ per year is used for comparative purposes.

A proposed project is considered inconsistent with air quality plans if it would result in population and/or employment growth that exceeds growth estimates included in the applicable Air Quality Plan. The proposed modified project consists of upgrading structures in an existing WTP. The upgrade of the structure would not induce population or employment growth that has not been anticipated in the Bay Area Air Quality Management District (BAAQMD) Plan[3]; therefore, there would be no impact.

As discussed above in determining significance for air quality impacts, Valley Water is comparing the proposed modified project impacts against the following BAAQMD thresholds:

- 54 pounds/day reactive organic gases (ROG) and oxides of nitrogen gas (NO_x)
- 82 pounds/day respirable particulates (PM_{10})[4] from equipment exhaust only
- 54 pounds/day fine particulates ($PM_{2.5}$)[5] from equipment exhaust only

Construction activities would result in temporary emission of ROG and NO_x, both of which are precursors to ozone formation, as well as carbon monoxide (CO) and particulate matter (both PM_{10} and $PM_{2.5}$) from equipment exhaust, construction-related vehicular activity, and construction worker automobile trips. Emission levels for construction activities would vary depending on the number and type of equipment, duration of use, operation schedules, and the number of construction workers. Criteria pollutant emissions of ROG and NO_x from these emission sources would incrementally add to the regional atmospheric loading of ozone precursors during project construction.

Construction emissions were estimated for the proposed modified project using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2. Model inputs were provided by the

[3] Bay Area Air Quality Management District. 2017 Bay Area Clean Air Plan.
[4] particulate matter with an aerodynamic resistance diameter of 10 micrometers or less
[5] particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less

project engineer and where data was not available CalEEMod defaults were used. **Table 4.2** (above) summarizes the proposed modified project on-road vehicle trips by phases.

Potential air quality impacts associated with the proposed modified project would be limited to short-term construction activities. There would be a negligible change in on-going stationary or mobile source emissions that would result from the project once the upgrades are completed.

The proposed modified project would result in temporary emissions of criteria pollutants and greenhouse gases; however, all estimated emissions would be below BAAQMD's thresholds and would not result in significant impacts to air quality, therefore the proposed modified project would not violate any air quality standards or contribute substantially to an existing or projected air quality violation.

As shown in **Table 4.5** and discussed above, the proposed modified project's construction-related emissions of ROG, NO_x, PM_{10}, and $PM_{2.5}$ would not exceed the significance thresholds during the project's two-year construction duration. Operational emissions would be similar to existing operations. The project is located in the SFBAAB, which is designated as a non-attainment area for ozone and particulate matter (BAAQMD 2017 and 2019). The significance thresholds represent the levels at which a project's individual emissions of criteria pollutants and precursors would result in a cumulatively considerable contribution to the SFBAAB's existing air quality conditions. If daily average or annual emissions exceed these thresholds, the project would result in a cumulatively significant impact. Since the project's emissions would be less than significant, its contribution would be less than cumulatively considerable and therefore, less than significant.

Construction-related activities could result in the generation of toxic air contaminants (TACs), specifically diesel particulate matter (DPM), from on-road haul trucks and off-road equipment exhaust emissions. Due to the variable nature of the proposed construction activity, the generation of TAC emissions would be temporary, especially considering the short amount of time such equipment is typically within an influential distance that would result in the exposure of sensitive receptors to substantial concentrations. As indicated in the model outputs for the proposed modified project, construction activities would generate a maximum of 1.1 pounds of $PM_{2.5}$ exhaust (inclusive of DPM) per day, which is well below the BAAQMD recommended significance threshold. Additionally, while no mitigation measure will be required because $PM_{2.5}$ emissions would be less than the significance threshold, Valley Water will implement appropriate BMPs to further reduce DPM exhaust emissions.

Sensitive receptors located within 1,000 feet of proposed construction include numerous single-family homes. The closest homes are located about 442 feet southeast of the active construction area. As discussed above, project-related emissions would be temporary and less than the significance thresholds. Also, construction emissions would dissipate to levels that would not cause a substantial health risk at these distances; therefore, this impact is considered less than significant. The proposed modified project would not create new sources of substantial pollutant concentrations or expose sensitive receptors to substantial criteria pollutant concentrations.

Construction of the proposed modified project would not result in objectionable odors to a substantial number of people. Also, the proposed modified project's residue management activities would not generate odorous spoils.

Construction-related emissions of greenhouse gases were calculated using the CalEEMod model. Estimated project-related greenhouse gas emissions are presented in **Table 4-5**.

Emissions estimates for construction activities include the use of construction equipment, construction worker commute trips, and haul trips for construction materials. As indicated, operational emissions were assumed to be negligible.

GHG from construction includes emissions from equipment and vehicles used for demolition, grading, grading, construction and paving and mobile emissions (e.g., emissions from combustion of fossil fuels for vehicle trips to and from the project site). GHG from construction activities presented in **Table 4-5** indicates construction activities would generate a maximum of 383 metric tons of CO2 per year over a 3-year construction period and will cease once construction is complete. CO2 emissions from operation would be consistent with current operations. BAAQMD has not recommended or adopted a quantitative threshold for construction GHG emissions but recommended that lead agencies incorporate best management practices to reduce GHG emissions during construction. Valley Water will implement BMPs to reduce GHG emissions from the project. Given the relatively small amount of GHGs that would be emitted from this project during construction, as well as implementation of BMPs, the project would not conflict with the state's goals under Assembly Bill 32 for reducing GHG emissions to 40 percent below the 1990 level by 2030 relative to construction emissions, such that the project's GHG emissions would result in substantial contribution to global climate change. Therefore, impacts from construction activities would be less than significant.

While this analysis shows that the proposed modified project would not result in any significant impacts relating to air pollutant (including GHS) emissions, dust, and odor, Valley Water will implement BMP AQ-1 and AQ-2 to further avoid and minimize project impacts. BMP AQ-1 includes dust control measures consistent with measures recommended by the BAAQMD to control dust during construction, and BMP AQ-2 requires stockpiling of potentially odorous materials at a distance sufficiently far from residential areas and other sensitive receptors.

Operational Impacts

The proposed modified project is not expected to result in a considerable change to the current operations of the WTP once construction is completed. Accordingly, the operational emissions in criteria air pollutants and GHGs from the proposed modified project would essentially be the same as the current operations under the previously approved project. Therefore, the change in operational emissions is considered negligible and not considered further in this analysis.

Biological Resources

As discussed in the 2013 MND, no riparian habitat, sensitive community, or federally or state protected wetlands are present in the proposed modified project area and thus the proposed modified project would not result in any impacts to these resources. No trees would be removed by the proposed modified project, and thus there would be no conflict with any local tree ordinances. In addition, the proposed modified project site is not covered by any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the proposed modified project will not conflict with provisions of any adopted conservation plans.

Surrounding the developed portions of the WTP, the dominant vegetation community consists primarily of an open to moderately dense woodland community. This woodland community is dominated by coast live oak, blue oak and gum species with an annual grass understory. A variety of shrubs are also found in association with the oaks, including: toyon, coyote brush,

mulefat, and poison oak. Non-native trees and shrubs are also present including European buckthorn (Rhamnus cathartica), Japanese privet, plum, and a variety of gum species.

A biological field reconnaissance survey conducted on July 24, 2019 is documented in the Habitat Assessment Technical Memorandum prepared by Stantec Consulting Services Inc. (Stantec). The survey found that there is moderate potential for San Francisco dusky-footed woodrat (woodrat), a species of special concern by the California Department of Fish and Wildlife (CDFW), movement/dispersal through the proposed modified project area.

Also, trees and understory vegetation on and adjacent to the project site may support nests of a variety of birds, including special-status species and common species that are protected under the Federal Migratory Bird Treaty Act[6] and Section 3513 of the California Department of Fish and Game Code. Though no tree removal would occur as part of the proposed modified project, construction activities would occur within the breeding bird season (February 1st through August 31st), and therefore construction noise could negatively impact potential breeding or migratory birds in the project vicinity. Construction-related noise and dust could disrupt nesting behavior and young rearing of adjacent nests and potentially lead to reduced nest success and/or abandonment. Loss of active nests would be considered a significant impact. However, implementation of Valley Water BMPs BI 5 and BI 6 and Mitigation Measure Bio-1.2 in the 2013 IS/MND, would minimize potential for such loss, resulting in a less than significant impact.

The likelihood of occurrence of the special-status plants and other special-status wildlife (i.e., other than woodrats and nesting birds) that could occur in the vicinity of the proposed modified project is very low; however, to ensure they are not present, a survey would be conducted before any groundbreaking activities. Mitigation Measures Bio-1.1 and Bio-1.2 (which were proposed in the 2013 IS/MND) would be implemented.

Mitigation Bio-1.1: Relocation of Woodrat Nests

The following measures will reduce impacts to woodrats and their nests. Previous surveys on the proposed location have already identified woodrat nests within the footprint of the project.

(1) Conduct a detailed survey to identify all the woodrat nests that would be impacted by the new road and/or utility corridors.

(2) Relocate the nest to a suitable location for woodrat activities. As described above, plant communities on the WTP grounds consist of coast live oak and blue oak woodlands, scattered eucalyptus trees within native and mixed scrublands, which are suitable for the relocation and habitat preservation of the woodrat population.

Mitigation Measure Bio-1.2: Establish Buffer Zones for Nesting Raptors and Migratory Birds

(1) The removal of trees and shrubs will be minimized to the extent practicable.

(2) Staging area size will be minimized to the extent practicable, and staging area access will be limited to a clearly demarcated path.

[6] 16 USC, Sec. 703 Supp. I, 1989

(3) In the event that an active nest of a protected bird species is discovered in the construction area, or in adjacent areas considered to have the potential to be disturbed by construction, a protective buffer zone will be established around the nest as follows:

- A 20-foot radius buffer zone will be established around the nest of any non-raptor ground-nesting bird.
- A 50-foot radius buffer zone will be established around any non-raptor nests in shrubs, trees, on structures, or on equipment.
- A 250-foot radius buffer zone will be established for hawks, owls, herons, and egrets.
- These buffer zones may be adjusted, depending on the type of project activity, the species of bird nesting, whether the nest would have a direct line of sight to construction activities, local topography and vegetation, and the existing noise and human disturbance levels. No construction activity of any kind will be permitted in the buffer zone until a qualified biologist determines that the young have fledged or otherwise abandoned the nest.

Cultural Resources

No architectural resources meeting the criteria for listing in the California Register of Historical Resources (CRHR) or the National Registry of Historic Places (NRHP) are present on the project site; therefore, there would be no impact.

A cultural resource evaluation of the WTP was conducted in 2002 by Archaeological Resource Management. The evaluation consisted of an archival search, a surface reconnaissance, and an evaluation of the potential significance of the properties according to guidelines of the California Register of Historic Resources. The archival research did not identify any recorded archaeological sites within the project area, nor within one-half mile of the WTP (ARM 2002). During field reconnaissance surveys, the project area was identified as highly disturbed by construction of the existing WTP; no prehistoric or historic cultural resources were noted.

Based on previous geotechnical reports prepared for the WTP (Fugro West, Inc. 2002, and Harza 2000), the project site is underlain by 20 to 55 feet of undocumented fills placed during initial site grading between 1965 and 1968. Beneath the fill, the site is underlain by Santa Clara Formation. There is evidence that Santa Clara Formation may contain animal and plant fossils (Adam et al. 1983). Based on a record search of U.C. Berkeley Museum of Paleontology files (UCMP 2011), there are no previously recorded fossil sites at the project site.

There is no surficial or archival data to suggest the presence of archaeological resources. Construction of the project would result in ground-disturbing activities including grading and excavation. However, ground-disturbing activities would be confined in depth and extent to areas comprised entirely of fill material placed in the 1960's. Given the disturbed nature of fill material, the presence of undocumented historical resources is considered unlikely; therefore, impact to archeological resources would be less than significant.

Nevertheless, should unidentified resources be encountered, the project would comply with all applicable federal, state, and local requirements and would implement measures specified in Valley Water BMP CU-1 to avoid and minimize impacts on archaeological resources and burial finds. Implementation of this BMP would require the contractor to halt work immediately and notify a consulting archaeologist in the event that archaeological artifacts are encountered and to notify the County Coroner if any burial site is found during construction. With these measures

in place, impacts on undocumented archaeological resources are expected to be less than significant; therefore, no mitigation is required.

There are no unique paleontological resources or geologic feature associated with the site; therefore, the proposed modified project would result in no impact to paleontological resources or geologic features.

There is no surficial or archival data to suggest the presence of human remains. As discussed above, ground-disturbing activities would be confined in depth and extent to areas comprised entirely of fill material placed in the 1960's; therefore, impact to humans remains is expected to be less than significant. However, implementation of BMP CU-1 would further avoid and minimize any project impacts on human remains.

Geology and Soils

The nearest active faults to the project site are the Monte Vista-Shannon and San Andreas faults, which are approximately 0.3 mile and 4 miles from the project site, respectively (Harza 2000). Although active faults are located within the vicinity of the project site, the WTP is not located on mapped fault traces or fault zones designated in the Alquist-Priolo Earthquake Fault Zoning map (CDC 2011). Fault rupture is not necessarily restricted to areas located within an Alquist-Priolo Earthquake Fault Zone, but the potential for rupture to occur at the project site is considered very low. As such, the potential to expose people or structures to potential adverse effects, including the risk of loss, injury, or death involving fault rupture is considered less than significant. No mitigation is required.

The project site is likely to experience strong ground shaking during the lifespan of the project. The project would be designed and constructed to comply with all applicable federal, state, and local requirements, including Valley Water seismic design criteria. Compliance with California Building Code seismic standards would ensure that the level of risk associated with exposure of people or structures to potential adverse effects, including the risk of loss, injury, or death from ground shaking would be acceptable. As such, potential effects are considered less than significant.

Based on a geotechnical investigation prepared for the site (Harza 2000), the near-surface soils encountered at the site are generally silty clays and relatively dense sands. In addition, ground water was not encountered in any of the borings drilled at the site; therefore, the liquefaction potential on-site is considered to be low and the potential to expose people to adverse effects involving liquefaction is considered less than significant.

Proposed facilities would be located primarily within topographically flat portions of the WTP. Based on previous geotechnical investigations, no landslide hazards were identified for the proposed facilities (Woodward-Clyde Consultants 1994 and Fugro West 2002). Impacts associated with seismically induced land sliding are considered less than significant.

Construction activities such as excavation and grading would expose soils to wind and water erosion forces. However, Valley Water would conduct all construction activities in accordance with Valley Water BMP WQ 16, which contains standard operation procedures and practices used to reduce erosion. In addition, measures to control post-construction erosion will be specified in the required Storm Water Pollution Prevention Plan (SWPPP) for the project (see discussion of water quality impacts in the *Hydrology and Water Quality* section). Incorporation of BMPs and implementation of the SWPPP would reduce the potential for soil erosion or loss of topsoil to less-than-significant levels.

The proposed modified project would be constructed according to industry standard geotechnical practices which typically include measures that mitigate the potential damage from unstable or expansive soils. As mentioned above, the project site is relatively flat and not susceptible to seismic, landslide, or liquefaction concerns. However, geotechnical reports prepared for the WTP indicate the project site is underlain by undocumented fill (Fugro West, Inc. 2002, and Harza 2000). Undocumented fill could be sufficiently unstable or expansive to potentially damage project concrete features. However, proposed structures on the site will be designed and constructed in accordance with design-level geotechnical investigations prepared for the project and reviewed by Valley Water prior to approval of the final plans and specifications. The geotechnical investigations will identify the specific design features that will be required for the project, including site preparation, compaction, trench excavations, foundation design, drainage, and pavement design. With implementation of recommendations in the design-level geotechnical reports, the project would not expose people or property to significant impacts associated with geologic conditions on-site.

No septic tanks or alternative wastewater systems are proposed for the proposed modified project.

Hazards and Hazardous Materials

Construction

During construction, some limited quantities of hazardous materials such as fuels, oils, hydraulic fluids, adhesives and other substances would be used at the project site. However, Valley Water would implement BMPs described in **Table 2-2** to prevent any of these hazardous materials from being released to the public or environment through routine transport, use, and disposal. These BMPs are Valley Water standard operation procedures used to reduce potential impacts on the public and the environment. Valley Water BMPs employed at the project site during construction would minimize the potential for accidental spills and provide measures to contain them if they do occur. Additionally, the implementation of BMPs identified in the SWPPP (see *Hydrology and Water Quality* section) would contain similar measures to prevent any accidental spills of hazardous materials from construction equipment. Therefore, the potential impact from construction activities is considered less than significant.

Operation

Operation of the proposed facilities would require the use of hazardous materials such as anionic or nonionic emulsion polymer, lubrication oils, and grease. Gravity thickener mechanisms, centrifuges, and screw conveyor systems would use minimal amounts of lubrication oils and grease as specified by the manufacturer. These amounts are expected to be minimal and would not appreciably differ from quantities used for the existing belt-press hydraulic systems and belt conveyor systems (S. Boettcher, personal communication).

New polymer systems would be provided to replace the existing systems. Operation of the new polymer systems would not be expected to increase or otherwise change the use of anionic or nonionic emulsion polymer.

Routine transport, use, storage, and disposal of the polymer, oils, and grease would comply with the existing Hazardous Materials Business Plan for the Plant (Valley Water BPMs 2014). Since the hazardous materials would be stored, handled, and used normally in accordance with strict requirements, they are not expected to result in an increased risk of upset at or around the WTP. However, accidental releases of hazardous materials, although not expected, could

occur. As required by numerous federal, state, and local regulations, safety features including secondary containment, leak detection, and alarm systems would be incorporated into project design. Also, following any accidental event, proper procedures for the response and cleanup of the site would be conducted in accordance with regulatory guidelines, Valley Water BMPs, and the HMBP for the WTP. Therefore, the potential to create a significant hazard to the public from exposure to hazardous materials would be considered less than significant.

There are no existing or proposed schools within a quarter mile of the project site. The Rolling Hills Middle School (1585 More Avenue) is located approximately 0.5 mile north of the WTP. The school is located on the designated haul route for deliveries, including deliveries of hazardous materials for the proposed residuals management operations. As discussed above, existing residuals management operations use polymer, lubrication oils, and grease. The proposed project would not increase the use of these materials. Efficiencies in new equipment may even reduce the quantities of polymer, oils, and grease needed for residuals management. Similar to existing chemicals that are delivered to the WTP, polymer, oils, and grease must be handled according to standards of federal and state Occupational Safety and Health Administrations, U.S. Department of Transportation, and other hazardous material agencies' requirements. Since the proposed modified project would not change existing practices for hazardous material delivery and since the Plant is operated more than a quarter mile from a school, the impact is considered less than significant.

The project site is not located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and therefore would have no impact on the public or environment (SWRCB 2011 and DTSC 2011).

The project site is not located within an airport land use or within two miles of an airport or private airstrip or result in people's safety, and therefore would not result in any related impact.

Construction and operation of the proposed modified project would not result in any change to any access roads and thus would not alter any evacuation routes or emergency response or action plans. Therefore, there would be no potential impacts related to emergency plans.

The project site is located within a residential area that is relatively wooded though is not considered wildlands. The project area does not lie within a fire hazard zone (Los Gatos 2011), and the potential risk of wildland fires is considered low. The potential impact from wildland fires is therefore less than significant.

Hydrology and Water Quality

Activities required to construct the proposed modified project, including site clearing, excavation, grading, fill placement and stockpiling, would have the potential to expose site soils to erosion and mobilize sediments in stormwater. Additionally, hazardous materials such as fuels, oils, grease, and lubricants from construction equipment could be accidentally released during construction. Accidental discharge of these materials could adversely affect water quality and/or result in violation of water quality standards. However, a SWPPP would be prepared in compliance with Section 402 of the federal Clean Water Act.[7] Construction projects that disturb one (1) acre of land or more are required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Construction Permit. Valley Water would prepare a SWPPP and file a Notice of Intent with the SWRCB to obtain coverage under the

[7] Clean Water Act, Section 402

SWRCB NPDES General Construction Permit (Order 99-08-DWQ). The SWPPP would include provisions to control erosion and sedimentation, as well as spill prevention measures to avoid and, if necessary, clean up accidental releases of hazardous materials. With the SWPPP in place, impacts related to degradation of water quality during construction would be less than significant.

Furthermore, the proposed modified project would be designed and constructed to comply with all applicable federal, state, and local requirements, including applicable provisions of the Municipal Regional Stormwater NPDES Permit.[8] Valley Water is a co-permittee of the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP) and, as such, is subject to the NPDES Municipal Permit for discharges of stormwater to the South San Francisco Bay. The SCVURPPP is regulated by the RWQCB under Order R2-2009-0074.

The proposed modified project is located within a sub-watershed that is less than 65 percent impervious (SCVURPPP 2016). Hydro-modification Management Requirements could apply to the project if it created or replaced more than one acre or impervious area. The proposed project area would create less than an acre of impervious area and, as such, would not be subject to Hydro-modification Management requirements. The RMP replaced more than 10,000 square feet of impervious area and must implement applicable design, control, and engineered treatment measures. The proposed modified project will replace additional 8,000 square feet of impervious area Compliance with NPDES Municipal Permit standards and implementation of applicable SCVURPPP measures would ensure the project would not result in significant water quality impacts post-construction.

Implementation of the proposed residuals management operations would result in the continued storage and use of hazardous materials (see *Hazards and Hazardous Materials* section). Additionally, the proposed residuals management process would continue to handle and dispose dewatered solids. However, the proposed modified project would be designed to prevent contact of hazardous materials and solids with stormwater runoff or other water discharged from the site to waterways. Thus, the proposed modified project would not result in substantial degradation of water quality, and the impact would be less than significant.

Hazardous materials and the equipment would be housed inside the centrifuge building. Likewise, solids extracted from the centrifuges would remain covered until they reach the haul trucks for off-site disposal. Solids spilled in the loading area would be prevented from entering waterways by recovering them and sending them to the centrate wet well for recycling into the lower sludge drying basins or gravity thickeners. With these design features in place, and the implementation of appropriate BMPs in Table 2-2, operation of the residuals management process would not violate any water quality standards or waste discharge requirements.

The proposed project would not use any groundwater supplies as a water source, reduce groundwater infiltration, or otherwise interfere with groundwater recharge. Therefore, there would be no impact to groundwater supplies.

Surface runoff is presently captured via underground drain systems and a man-made concrete ditch. The concrete ditch originates east of the washwater recovery basins and drains to the north, parallel to the washwater recovery basins and upper sludge drying basins, until it reaches two 36-inch buried storm drains near the northeast corner of the property. Runoff entering the storm drains is discharged into Smith Creek, which joins San Tomas Aquino Creek about

[8] Municipal Regional Stormwater NPDES Permit, NPDES Permit No. CAS612008, October 14, 2009

1.5 miles north of the site. San Tomas Aquino Creek ultimately discharges to South San Francisco Bay via the Guadalupe Slough.

The proposed modified project would be constructed in a developed area of the WTP and would not convert significant vegetated pervious ground surface to impervious surfaces. The RMP altered the site drainage patterns because it took out of service 2 sludge drying basins and installed approximately 35,500 square feet of impervious surfaces (i.e., parking spaces, roadway, walkways, and new building rooftops). Although the sludge drying basins are also impervious features that prevent runoff from infiltrating into soils, they do prevent captured precipitation from entering the storm drain system.

The RMP realigned storm drains around the dewatering building and washwater recovery basin and preserved the general drainage patterns. The RMP increase of 35,500 square feet of impervious surfaces represented an increase of two percent of the total area that would contribute to site runoff. The proposed project would not increase impervious surfaces more than the amount already generated by the RMP; therefore, it would not result in a substantial increase in the rate or amount of surface runoff from the WTP; on- or off-site flooding would not be anticipated.

Construction of the proposed residual management facilities would have the potential to expose site soils to erosion and mobilize sediments in stormwater. However, with the SWPPP in place, on-and off-site erosion and siltation impacts related to construction would be less than significant.

Furthermore, Valley Water would implement applicable design, control, and engineered treatment measures in compliance with Municipal Regional Stormwater NPDES Permit standards. Compliance with NPDES Permit standards and implementation of applicable design, control, and engineered treatment SCVURPPP measures would ensure the project would not result in significant flooding, erosion, or siltation impacts post-construction.

Other than the construction- and operation-related water quality impacts discussed above, there would be no substantial additional sources of polluted runoff; potential impacts of the proposed project with respect to additional polluted runoff are considered less than significant.

Runoff from the additional impervious surface created by the proposed project would not place surrounding homes within a 100-year Flood hazard. The project is located in a 500-year flood plain (Los Gatos 2020) and there is no risk for flood hazard area as shown on the FEMA map for the area (FEMA 2011).

The proposed modified project is located in a 500-year flood plain area as described above. No new structure is proposed that would impede flood flows; therefore, the proposed project would have no impact with respect to impeding flood flows.

The proposed modified project is not located within an area that is potentially subject to flooding and would not expose people or structures to a significant risk due to flooding from storms, levees, or dams; therefore, there would be no impact.

The proposed modified project would not expose people or structures to a significant risk due to seiche, tsunami, or mudflow because the site is not located within a flood zone.

Land Use and Planning

The proposed modified project consists of upgrading the RMP. The proposed modified facilities would not alter the physical arrangement of surrounding neighborhoods and would not constitute a physical barrier to established or contemplated communities. Thus, implementation of the proposed modified project would not result in the division of an established community.

Valley Water is not subject to the land use and zoning designations of local jurisdictions for projects involving public utility uses such as production, generation, storage, treatment, or transmission of water.[9] It is, however, the practice of Valley Water to work with the local jurisdiction during project planning and to conform to local land use plans and policies to the extent possible.

The project would be implemented within the existing WTP, in a manner consistent with the existing character of the WTP. In addition, project implementation would not introduce any land uses that are significantly different from existing uses. Based on consistency with Valley Water environmental policies and the lack of development associated with the project, land use impacts are considered less than significant.

The project site is not located within an area covered by an adopted habitat conservation plan or natural community conservation plan.

Mineral Resources

There are no mineral resources identified by the State of California Resources Agency Department of Conservation at the project site (Stinson et al., 1983). The project site is located in an urban area, surrounded by residential development, and is unsuitable for mineral extraction. Therefore, the proposed modified project would not result in any impact on mineral resources.

Noise

Some land uses are more tolerant of noise than others. For example, schools, hospitals, churches, and residences are considered to be more sensitive to noise intrusion than are commercial or industrial activities. Ambient noise levels can also affect the perceived desirability or livability of a development. The RWTP facility is located at 400 More Avenue in the Town of Los Gatos. The RWTP facility lies within a residential area bounded by More Avenue to the west, Granada Way to the north, the La Rinconada County Club and Smith Creek to the east, residential uses to the southeast, and the Rinconada and San Jose Water Company enclosed reservoirs to the south. The area of the residuals work will be concentrated on the east side of the facility as shown in **Figure 4.1** below.

[9] California Government Code Section 53091(d) and (e).

Figure 4.1. Area of Residuals Remediation Project

The closest noise-sensitive single-family residential receptors to the area of work on the RWTP site will be the single-family residences across Granada Way. The home at 220 Granada Way is about 442 feet from the RWTP area of work. The other closest residential receptors to the RWTP area of work include the single-family residence at 205 Chippendale Court to the southeast (492 feet from the area of work) and the single-family home at 116 Los Patios across More Avenue (646 feet from the area of work).

EXISTING AMBIENT NOISE LEVELS

Illingworth & Rodkin, Inc. performed a noise monitoring survey between Monday, October 14, 2013 and Thursday, October 10, 2013 to quantify ambient noise levels in the project area. The results of the ambient noise measurements are presented in Valley Water RIP *Noise and Vibration Assessment Report*. The results of the ambient noise measurements around the project site were noted as follows in the report:

- Measurement ST-1: End of Chippendale Court: Leq – 52 dB(A)
- Measurement LT-1: Adjacent to 224 Granada Way, north of the RWTP site. Ldn – 54-55 dB(A) with hourly average nighttime levels as low as 39-43 dB(A) Leq.

- Measurement LT-2: Along More Avenue across from the lower More Avenue entrance to the RWTP. Ldn – 60-63 dB(A) with hourly daytime average levels between 60-65 dB(A) Leq and hourly nighttime average levels as low as 41 dB(A) Leq.

Also, a memo titled *Noise and Technical Assessment Technical Memo* was prepared by Stantec to assess the noise environmental impacts of the RRP.

Town of Los Gatos General Plan Noise Element

The town of Los Gatos General Plan Noise Element indicates that the major noise sources in Los Gatos are traffic-generated, particularly along SR-17 and SR-85. No major stationary noise sources are located within the town of Los Gatos' jurisdiction. The goal of the noise element includes preserving the quiet atmosphere of the town, ensuring that noise from new development and new land uses do not adversely affect existing land uses, and ensuring that proposed development is not adversely affected by existing noise. Construction noise related policies and implementing actions of the noise element focus on protecting residential areas from noise by requiring the use of noise attenuating construction techniques and materials, and also maintaining noise-reducing restrictions for industrial uses adjacent to residential districts.

Town of Los Gatos Municipal Code

Noise standards in Los Gatos are defined in the municipal code. Los Gatos Municipal Code Section 16.20.035 states that construction activities are allowed between 8 a.m. and 6 p.m. on weekdays, and between 9:00 a.m. and 4:00 p.m. on Saturdays if authorized by a valid town permit or otherwise allowed by Town permit, and if the activities meet at least one of the following noise limitations:

- No individual piece of equipment shall produce a noise level exceeding 85 dBA at 25 feet. If the device is located within a structure on the property, the measurement shall be made at distance as close to 25 feet from the device possible.
- The noise level at any point outside of the property shall not exceed 85 dBA.

Project Fixed Noise Sources

Based on the Los Gatos Noise Zone Maps, operation noise is limited to meet the most restrictive threshold of 37 dB(A) (weekend nighttime) at all residential property lines. The proposed modified project will include the following:

- Installation of two new concrete sludge storage/mixing tanks
- Installation of two new centrifuges and a new polymer system in the existing Belt Press Building (now used for equipment storage and shop space)
- Installation of four new centrifuge feed pumps
- Installation of new yard piping
- Modifications to the existing loadout structure
- Modifications to the existing thickener inlet and outlet piping
- Modifications to the existing electrical supply and control system

- Modifications to the existing Centrifuge Building

The new equipment, such as the centrifuge feed pumps and any associated fans, will generate noise that will radiate to the neighboring properties and will not exceed the maximum noise level limits listed in Chapter 16 of the Los Gatos Municipal Code. Thus, the on-site equipment would be designed to lower noise from these proposed equipment by incorporating measures such as parapet walls, enclosures for noisier equipment, selection of "quiet" equipment, location of enclosure openings, venting, etc. away from residences, and/or the construction of noise barriers; therefore, the proposed modified project would not result in a new source of operational noise and impacts would be less than significant. The proposed modified project would not result in new or substantially worse permanent noise impacts.

Short Term Construction Noise Impacts

Two types of short-term noise impacts could occur during construction of the proposed modified project. First, construction crew commutes and the transport of construction equipment and materials to the project site would incrementally increase noise levels on access roads leading to the project site. This increased traffic would be comprised of vehicles, medium trucks, and heavy trucks. All roads leading to the RWTP site pass through residential neighborhoods. The associated short-term noise from construction vehicles along More Avenue and Granada Way would be instantaneous and short-term because the Plant is enclosed and no construction activities, such as unloading construction equipment is proposed outside of the Plant. The proposed modified project would not result in substantial increase of noise impact from construction traffic.

The second type of short-term noise impact is related to noise generated during construction. Construction stages would include excavation, site grading and drainage, site paving, yard piping and utilities, and install slab and walls. Each construction stage has its own mix of equipment and, consequently, its own noise characteristics. These various construction operations would change the character of the noise generated at the project site and, therefore, the exterior noise level as construction progresses.

The loudest phases of construction for this project is anticipated to be the installation of the slab and walls, because of the number of concrete trucks involved, and the excavation stage, as the noisiest construction equipment is earthmoving and grading equipment. **Table 4.6** below lists types of construction equipment that may be used throughout construction and the maximum and average operational noise level as measured at 442 feet from the operating equipment. The 442-foot distance represents the approximate distance between the project site and the closest noise-sensitive receptor at 220 Granada Way.

The construction of the entire project will be conducted in five (5) sequential stages and each stage will utilize different pieces of construction equipment. The main noise-producing equipment for each construction stage are shown below in **Table 4.7.**

Table 4-6 Summary of Federal Highway Administration Roadway Construction Noise Model

Construction Equipment Source	Distance to Nearest Sensitive Receptor	Estimated Sound Level at Receptor		
		Lmax	Acoustical Use Factor (%)	Leq
Dump Truck[1]	442 feet	57.5 dB(A)	40	53.5 dB(A)
Excavator	442 feet	61.8 dB(A)	40	57.8 dB(A)
Flat Bed Truck[2]	442 feet	55.3 dB(A)	40	51.3 dB(A)
Pickup Truck	442 feet	56.1 dB(A)	40	52.1 dB(A)
Dozer	442 feet	62.7 dB(A)	40	58.8 dB(A)
Compactor	442 feet	64.3 dB(A)	20	57.3 dB(A)
Backhoe	442 feet	58.6 dB(A)	40	54.7 dB(A)
Crane	442 feet	61.6 dB(A)	16	53.7 dB(A)
Concrete Mixer Trucks	442 feet	59.9 dB(A)	40	55.9 dB(A)

Source: Stantec 2019, Federal Highway Administration RCNM, v1.1, 2008
NOTES:

1. Also used for the Haul Trucks and Asphalt Trucks in this analysis.
2. Use for the Water Truck in this analysis.

Table 4-7 Construction Stage Equipment for Proposed Modified Project

Construction Stage	Planned Equipment
Excavation	10-Yard Dump Truck (2) Excavator Haul Trucks (8) Water Truck Pickup Trucks (4)
Site Grading and Drainage	Dozer Compactor Backhoe Pickup Trucks (3)
Site Paving	Pickup Trucks (3) Compactor Asphalt Trucks (3)
Yard Piping and Utilities	10-Yard Dump Truck
Install Slab and Walls	Crane Concrete Trucks (15)

A worst-case condition for construction activity would assume all noise-generating equipment were operating at the same time and at the same distance away from the closest noise-

sensitive receptor. Using this assumption, the RCNM program calculated the following combined Leq and Lmax noise levels from each phase and stage of construction as shown in Table **4.8**.

Table 4.8 Calculated Noise Level from Each Construction Stage

Construction Stage	Distance to Closest Noise Sensitive Receptor	Calculated Leq	Calculated Lmax
Excavation	442 feet	65.6 dB(A)	69.6 dB(A)
Site Grading and Drainage	442 feet	63.2 dB(A)	68.1 dB(A)
Site Paving	442 feet	62.3 dB(A)	67.5 dB(A)
Yard Piping and Utilities	442 feet	53.5 dB(A)	57.5 dB(A)
Install Slab and Walls	442 feet	67.8 dB(A)	72.1 dB(A)

Although noise levels could fall into the "conditionally acceptable" range for residential uses as defined by **Table 4.7**, increases in noise levels from construction activities would be temporary. Valley Water would also implement Mitigation Measure NOI-4 (which was proposed in the 2013 MND) to reduce noise impacts during construction. Mitigation Measure NOI-4 would sufficiently reduce noise impacts to less than significant. In addition, construction activities would follow the construction hour restrictions in the Los Gatos Municipal Code. The Los Gatos Municipal Code restricts construction activities to the hours of 8:00 a.m. to 6:00 p.m. on weekdays and 9:00 a.m. to 4:00 p.m. on Saturday, unless otherwise approved by the town and if construction activities meet specified noise limits. If construction is needed outside the Town's permissible construction hours, no construction will proceed without prior approval by the Town. Therefore, the proposed modified project would be in compliance with the Town's noise ordinance, and as such the impact relating to noise from construction activities would be less than significant.

Mitigation Measure NOI-4: Reduce Temporary Noise Impacts from Construction

To reduce noise impacts due to construction, Valley Water will require construction contractors to adhere to the following measures. Valley Water will be responsible for ensuring implementation.

- Stationary noise-generating equipment will be located as far as possible from sensitive receptors, and, if feasible, will be shielded by placement of other equipment or construction materials storage.
- Equipment shall have appropriate mufflers, intake silencers, and noise-control features and would be properly maintained and equipped with exhaust that meet state standards
- Vehicle and other gas- or diesel-powered equipment would be prohibited from unnecessary warming up, idling, and engine revving.

During the construction of the proposed modified project, equipment such as bulldozers and loaded trucks may be used as close as 442 feet from the nearest sensitive receptors 220 Granada Way. Construction equipment that would be used during project construction would generate vibration levels between 0.00004 PPV and 0.0012 PPV at 442 feet as shown below in

Table 4-9 All the groundbourne vibration levels are below the Federal Transit Administration (FTA) vibration threshold at which human annoyance could occur of 0.10 PPV. Additionally, construction activities would be temporary in nature and would likely occur during normal daytime working hours. Therefore, construction vibrations would not cause damage to existing buildings or cause annoyance to sensitive receptors. As such, implementation of the proposed modified project would result in less than significant impact related to vibration.

Table 4-9 Vibration Source Levels for Construction Equipment

Type of Equipment	Peak Particle Velocity at 25 Feet	Peak Particle Velocity at 50 Feet	Peak Particle Velocity at 442 Feet	Threshold at which Human Annoyance Could Occur	Potential for Proposed modified Project to Exceed Threshold
Large bulldozer	0.089	0.031	0.0012	0.10	None
Loaded trucks	0.076	0.027	0.001	0.10	None
Small bulldozer	0.003	0.001	0.00004	0.10	None
Source: Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual, September 2018					

There are no public airports or private airstrips within a two-mile radius of the proposed modified project site and no noise related impacts relative to airports would result from the proposed modified project.

Population and Housing

The proposed modified project would involve the construction of improved facilities to continue operation of the WTP at the existing capacity. The proposed modified project would not result in direct or indirect population growth in the area.

The proposed modified project would occur within the existing Plant boundary and would not displace any housing units or people. Thus, there would be no impact on population and housing.

Public Services

The proposed modified project would not result in adverse impacts associated with public services. The project would have no impact on fire and police protection in the community. The proposed project would not result in a need for additional schools, parks, or other public facilities.

Recreation

Increases in demand for recreational facilities are typically associated with substantial increases in population. As described in the *Population and Housing* section, the proposed project would not induce population growth. The proposed modified project would not result in a substantial increased demand for recreational facilities or adversely affect the Town of Los Gatos park or population standards.

The proposed modified project does not include any plans for the addition of any recreational facilities, nor would it require the construction or expansion of recreational facilities.

Transportation/Traffic

Two key components of the circulation network in Los Gatos are the regional highway and local street systems. Regional Highway access to the project area is provided by SR-17 and SR-85. SR-17 runs north-south through the Town of Los Gatos, south to Santa Cruz and north to San Jose where it provides regional access to SR-85 and Interstate 880. SR-85 runs east-west through the Town of Los Gatos and provides regional access to U.S. Highway 101 in Mountain View as well as to south San Jose, Interstate 280, Interstate 880 and SR-17. There are peripheral connections to SR-87 from SR-85, but not directly in the Town of Los Gatos. In the project area, More Avenue, Wedgewood Avenue, Montclair Road, and Quito Road are neighborhood collector streets that do not encourage through traffic.

The truck routes through Los Gatos are on the following roadways:

- SR-17
- SR-85
- Los Gatos Boulevard Los Gatos – Saratoga Road (RS- 9)
- Winchester Boulevard
- Los Gatos – Almaden Road
- Blossom Hill Road
- Lark Avenue

The haul route suggested for this project would use the same haul route currently used for operational deliveries to and from the Plant. The proposed haul route would enter and exit the Plant site entrance from one or both entrances/exits off of More Avenue. The truck traffic leaving the Plant would take More Avenue to Pollard Road, and then onto Winchester Boulevard to Lark Avenue and onto SR-17. Trucks would use the same route in reverse to make deliveries the RWTP.

Stantec prepared a vehicle-miles traveled (VMT) assessment for the RRP. This VMT analysis was prepared to determine if the RRP would result in any new or substantially greater transportation impacts than what were originally disclosed in the 2013 IS/MND for the RMP.

The VMT assessment was prepared in support of the modified Project's environmental documentation and complies with the updated CEQA guidelines that incorporates the requirements of Senate Bill 743 (SB 743). SB 743 requires the Governor's Office of Planning and Research (OPR) to establish recommendations for identifying and mitigating transportation impacts within CEQA. Generally, SB 743 moves away from using delay-based level of service (LOS) as the metric for identifying a project's significant impact to instead use VMT. The final Technical Advisory released by OPR in December 2018[10] was used as a guidance for evaluating transportation impacts and VMT since the Town of Los Gatos is yet to adopt guidelines for VMT analysis.

[10] Technical Advisory on Evaluating Transportation Impacts in CEQA, Governor's Office of Planning and Research, State of California, December 2018

Project Screening

Prior to undertaking a detailed VMT analysis, the Technical Advisory advises that lead agencies conduct a screening process "to quickly identify when a project should be expected to cause a less-than-significant impact without conducting a detailed study". The Technical Advisory suggests that lead agencies may screen out VMT impacts using project size, maps, transit availability and provision of affordable housing.

The proposed modified project would result in a temporary (approximately 2 years) increase in construction-related traffic, however the increase would not result in a conflict with an applicable plan, ordinance or policy.

For this assessment, the proposed modified project has been evaluated using the project type screening criteria, for which OPR provides guidance to screen out projects generating fewer than 110 daily trips. OPR also states that VMT from construction traffic are not applicable to the intent of SB 743 and are not subject to the requirements for CEQA VMT analysis[11] as it applies to Land Development and Transportation projects only. Therefore, the proposed modified project can be assumed to have a less than significant VMT impact during construction.

During operations, the number of trucks hauling dewatered dry solids to and from the RWTP would increase to 523 trucks per year from 319 trucks per year, an average of one additional truck per day[12]. Accordingly, the proposed modified project net new trip generation is conservatively estimated to be two daily trips due to the addition of one truck per day on average, which is less than the 110 daily trips threshold. Therefore, the modified Project would result in a less than significant VMT impact during operations.

With the Town of Los Gatos yet to adopt the new VMT guidelines, the guidance outlined in the OPR Technical Advisory for VMT assessment was used as the basis of this evaluation. Based on this guidance, the proposed modified project would result in a less than significant impact on VMT during construction.

The proposed modified project does not include new roadways or changes to existing roadways and would therefore not increase hazards within the trajectory of transportation routes. Therefore, there would be no impact.

Access for emergency vehicles would be maintained at all times during the construction period. Implementation of BMPs would reduce the potential impact to a less than significant level.

Tribal Cultural Resources

Potential impacts to tribal cultural resources was added to the CEQA Appendix G Checklist in July 2015 as a result of the passage and implementation of AB 52; therefore, this topic was not evaluated in the 2013 IS/MND. AB 52 is applicable to all CEQA projects for which a Notice of Preparation, Notice of Mitigated Negative Declaration or Notice of Negative Declaration was filed or issued after July 1, 2015. Because the Notice of Intent to Adopt a Mitigated Negative Declaration for the approved project was filed before July 1, 2015, AB 52 does not apply to the proposed modified project.

[11] SB 743: What You Ned to Know, Governor's Office of Planning and Research, Webinars – April 9, 2020, April 16, 2020, and April 20, 2020.
[12] Based on 4 days per week, i.e., 208 days per year of operations ((523-319)/208 = 1.0)

Moreover, the proposed modified project site has been developed, and construction activities would not include major excavation or disturbance of land; therefore, no new impacts are expected. Also, BMP CU-1 would adequately avoid and minimize impact on cultural resources should they be encountered during construction. With the BMP CU-1, the propose modified project would not result in a significant impact on tribal cultural resources.

Utilities and Service Systems

No new waste treatment activity is proposed, so the proposed modified project would not exceed wastewater treatment requirements by the San Francisco Bay Regional Water Quality Control Board; therefore, there would be no impact.

The proposed modified project would not expand the capacity of the Plant. The proposed modified project would upgrade the existing residual management structures in a potable WTP.

The proposed modified project requires the reconfiguration of an existing stormwater system at the Plant to accommodate the existing drying beds. It would not change the storm water drainage system of the site. The improved stormwater piping will ensure stormwater is either treated at the Plant or discharged into existing City facilities.

The proposed modified project would not affect existing water supply entitlements, nor would it require new or expanded entitlements. As such, no impact would occur.

The proposed modified project would construct a new building that includes several sinks and a restroom. The sinks and toilet would generate a negligible amount of wastewater. The project would not exceed wastewater treatment capacity of the West Valley Sanitation District, and impact would be considered less than significant.

Construction

The proposed project would generate construction-related solid waste. During construction, the proposed modified project would require the disposal of approximately 6,400 cubic yards of soil and construction debris. The material would likely be disposed at the Guadalupe Landfill over the 28-month construction period. The landfill recycles construction debris (soil, concrete, asphalt) which is used on-site as construction materials and daily landfill cover. The remaining capacity of the landfill as of October 2016[13] was approximately 11,163,000 cubic yards. The landfill has a maximum permitted disposal capacity of 3,650 tons per day (County of Santa Clara 2011). The disposal of 6,400 cubic yards of material would constitute a negligible percentage of the remaining capacity. The landfill would have sufficient permitted capacity to accommodate the project's solid waste construction material disposal needs. The construction contractor would be required to properly dispose of all construction related solid waste, including soil, at appropriate disposal facilities and in accordance with the applicable local regulations. Removal of solid waste would continue at the WTP in accordance with strict federal, state, and local statutes and regulations. Therefore, impacts would be considered less than significant.

[13] Bay Area Air Quality Management District. October 2016. *Guadalupe Rubbish Disposal Company Facility #A3294 Major Facility Review Permit.* San Francisco. California

Operation

Implementation of the residuals management process for the proposed modified project would continue improving the thickening and dewatering processes and reduce the volume of dewatered solids for off-site disposal. Improvements resulting from the proposed modified project would be beneficial by reducing expected landfill volume needed to operate the WTP. Dewatered solids would continue to be disposed at the Newby Island Landfill, which would continue to accommodate the incremental decrease in dewatered solids. Therefore, this impact would be considered less than significant.

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Appendix A: Mitigation Monitoring Reporting Program for the Second Addendum for the Rinconada Water Treatment Plant Residuals Management Project

Under the California Environmental Quality Act (CEQA), the Lead Agency must adopt a Mitigation Monitoring and Reporting Program (MMRP) as part of project approval whenever a Mitigated Negative Declaration or an Environmental Impact Report (EIR) is prepared on a project. This is stated in the CEQA Guidelines as follows:

"In order to ensure that the mitigation measures and project revisions identified in the Negative Declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects." (§15097 (a))

"The Lead Agency may choose whether its program will monitor mitigation, report on mitigation, or both. "Reporting" generally consists of a written compliance review that is presented to the decision-making body or authorized staff person. A report may be required at various stages during project implementation or upon completion of the mitigation measure. Reporting ensures that the approving agency is informed of compliance with mitigation requirements. "Monitoring" is generally an ongoing or periodic process of project oversight. Monitoring ensures that project compliance is checked on a regular basis during and, if necessary, after implementation. There is often no clear distinction between monitoring and reporting and the program best suited to ensuring compliance in any given instance will usually involve elements of both." (§15097 (c))

The amended MMRP is summarized in the table below. The table lists the impacts, mitigation measures, method and timing of implementation, and monitoring responsibility related to the Second Addendum to the Rinconada Water Treatment Residuals Management Project. It also suggests the documentation to be used to indicate that the measure was implemented. The table includes a column for a signature to verify that the measure was implemented, so that the MMRP itself can be used as the documentation.

The Santa Clara Valley Water District (Valley Water) is the lead agency and is responsible for ensuring that the mitigation measures are implemented. All the mitigation measures listed in the MMRP would be implemented by Valley Water or by its appointees.

According to CEQA Guidelines Section 15126.4 (a)(2), "Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments." Permit conditions, if any, and mitigation measures listed in the MMRP would be implemented by Valley Water when the project is approved.

Impact	Mitigation Measure	Implementation Responsibility & Timing	Monitoring and Reporting Responsibility	Verified Implementation
Air Quality				
Impact AQ-2: Violate Any Air Quality Standard, Contribute Substantially to an Existing or Projected Air Quality Violation	**Mitigation Measure AQ-2.1 Implement Current BAAQMD Basic Construction Measures during Construction** Valley Water shall implement all of the BAAQMD's feasible control measures to reduce exhaust emissions of PM from construction activities presented below (as feasible and where applicable). • Use grid power instead of diesel generators at all construction sites where it is feasible to connect to grid power. • In contract specifications, include requirements of 13 CCR 2480 and 2485, which limit the idling of all diesel-fueled commercial vehicles (weighing over 10,000 lbs) to 5 minutes at any location. In addition, limit the use of diesel auxiliary power systems and main engines to 5 minutes when within 100 feet of homes while the driver is resting. • Minimize idling time to 5 minutes for all onsite heavy-duty equipment when not engaged in work activities. • Locate staging areas and equipment maintenance activities as far from sensitive receptors as possible. • Develop a schedule of low-emissions tune-ups and perform such tune-ups on all equipment. A log of required tune-ups shall be maintained and a copy of the log submitted to the District on a monthly basis for review. In addition, all equipment shall be maintained in good working order and properly tuned n accordance with	**Implementation:** District/Contractor **Timing**: During Construction	District Project Manager	**Initials** _____ **Date** _____

Impact	Mitigation Measure	Implementation Responsibility & Timing	Monitoring and Reporting Responsibility	Verified Implementation
	manufacturers' specifications. **Mitigation Measure AQ-2.2: Implement Draft BAAQMD Basic Construction Measures during Construction** Valley Water shall implement the following draft BAAQMD-recommended control measures to reduce PM and exhaust emissions from construction activities. Valley Water shall include the following additional control measures, where applicable, in contract specifications: • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. • All haul trucks transporting soil, sand, or other loose material off-site shall be covered. • All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. • All vehicle speeds on unpaved roads shall be limited to 15 mph. • All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. • Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by California airborne toxics control measure Title 13, Section 2485 of California Code of			

Impact	Mitigation Measure	Implementation Responsibility & Timing	Monitoring and Reporting Responsibility	Verified Implementation
	Regulations [CCR]). Clear signage shall be provided for construction workers at all access points. • All construction equipment shall be maintained and properly tuned in accordance with manufacture's specifications. All equipment shall be checked by a certified visible emissions evaluator. • Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations. These measures will be stipulated in construction plans and specifications, and enforced by the District. **Mitigation Measure AQ-2.3: Implement Draft BAAQMD Additional Construction Measures during Construction** Valle Water shall implement the following draft BAAQMD-recommended control measures to reduce PM and exhaust emissions from construction activities. The District shall include the following additional control measures, where applicable, in contract specifications: • All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe. • All excavation, grading, and/or demolition activities shall be suspended when			

Impact	Mitigation Measure	Implementation Responsibility & Timing	Monitoring and Reporting Responsibility	Verified Implementation
	average wind speeds exceed 20 mph. • Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity. • Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established. • The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time • All trucks and equipment, including their tires, shall be washed off prior to leaving the site. • Site accesses to a distance of 100 feet from the paved road shall be treated with a 6 to 12 inch compacted layer of wood chips, mulch, or gravel. • Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent. • The project shall develop a plan demonstrating that the off-road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and subcontractor vehicles) would achieve a project wide fleet-average 20 percent NOX reduction and 45 percent PM reduction compared to the most recent CARB fleet average. Acceptable options			

Impact	Mitigation Measure	Implementation Responsibility & Timing	Monitoring and Reporting Responsibility	Verified Implementation
	for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as such become available. • Use low Volatile Organic Compound (VOC) [i.e., Reactive organic Gases (ROG)] coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings).			
Impact AQ-6: Greenhouse Gas Emissions during Construction (Less than Significant with Mitigation)	**Mitigation Measure AQ-6: Implement Construction Equipment GHG Reduction Measures** Valley Water shall include the following measures, as feasible and where applicable, in construction-contract specifications. These measures, in addition to having other environmental benefits, would also reduce GHG emissions. Some of these measures are part of ARB's "Early Action Measures." • Valley Water will require that contractors maintain tire inflation to the manufacturer's inflation specifications • Valley Water will require that contractors shut down equipment when not in use for extended periods of time, and minimize idling time (i.e., 15 minute maximum). The District will implement a construction worker education program. • Recycling and reuse of building materials from remodeled and demolished buildings. • Use of recycled-content construction materials in new construction.	**Implementation:** District/Contractor **Timing:** During Construction	**Implementation:** District/Contractor **Timing:** During Construction	**Initials** _____ **Date** _____

Impact	Mitigation Measure	Implementation Responsibility & Timing	Monitoring and Reporting Responsibility	Verified Implementation
	• Reuse and rehabilitate existing buildings when appropriate and feasible in order to reduce waste, conserve resources and energy, and reduce construction costs. • Require new construction and remodels to use energy- and resource-efficient and ecologically sound designs, technologies, and building materials, as well as recycled materials to promote sustainability. • Reductions in the use of nonrenewable resources in building construction, maintenance, and operations. • Require LEED certification or comparable certification for new non-residential buildings over 5,000 square feet.			
Biology				
Impact Bio-1 Substantial Adverse Effect on any Species identified as a candidate, sensitive, or Special-Status Species on local or Regional Plans, Policies, or Regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? (Less than Significant with Mitigation)	**Mitigation Bio-1.1: Relocation of Woodrat Nests** The following measures will reduce impacts to woodrats and their nests. Previous surveys on the proposed location have already identified woodrats nests within the footprint of the project. (1) Conduct a detailed survey to identify all the woodrat nests that would be impacted by the new road and/or utility corridors. (2) Relocate the nest to a suitable location for woodrat activities. As described above, plant communities on the water treatment plant grounds consist of coast live oak and blue oak woodlands, scattered eucalyptus trees within native and mixed scrublands,	**Implementation:** District/Contractor **Timing:** Before Construction	District Project Manager	**Initials** _____ **Date** _____

Impact	Mitigation Measure	Implementation Responsibility & Timing	Monitoring and Reporting Responsibility	Verified Implementation
	which are suitable for the relocation and habitat preservation of the woodrat population. **Mitigation Measure Bio-1.2: Establish Buffer Zones for Nesting Raptors and Migratory Birds** The following measures will reduce impacts to nesting birds to a less than significant level: (1) The removal of trees and shrubs will be minimized to the extent practicable. (2) Staging area size will be minimized to the extent practicable, and staging area access will be limited to a clearly demarcated path. (3) In the event that an active nest of a protected bird species is discovered in the construction area, or in adjacent areas considered to have the potential to be disturbed by construction, a protective buffer zone will be established around the nest as follows: • A 20-foot radius buffer zone will be established around the nest of any non-raptor ground-nesting bird. • A 50-foot radius buffer zone will be established around any non-raptor nests in shrubs, trees, on structures, or on equipment. • A 250-foot radius buffer zone will			

Impact	Mitigation Measure	Implementation Responsibility & Timing	Monitoring and Reporting Responsibility	Verified Implementation
	be established for hawks, owls, herons, and egrets. These buffer zones may be adjusted in consultation with applicable resource agencies, depending on the type of project activity, the species of bird nesting, whether the nest would have a direct line of sight to construction activities, local topography and vegetation, and the existing noise and human disturbance levels. No construction activity of any kind will be permitted in the buffer zone until a qualified biologist determines that the young have fledged or otherwise abandoned the nest.			
Noise				
Impact NOI-3: Cause a Substantial Permanent, Temporary, or Periodic Increase in Ambient Noise levels in the Project Vicinity above Levels Existing without the project (Less than Significant with Mitigation)	**Mitigation Measure NOI-1: Reduce Noise Impacts from Construction** To reduce noise impacts due to construction, the District will require construction contractors to adhere to the following measures. The District will be responsible for ensuring implementation. • Stationary noise-generating equipment will be located as far as possible from sensitive receptors, and, if feasible, will be shielded by placement of other equipment or construction materials storage.	**Implementation:** District/Contractor **Timing:** During Construction	District Project Manager	**Initials** _____ **Date** _____

Impact	Mitigation Measure	Implementation Responsibility & Timing	Monitoring and Reporting Responsibility	Verified Implementation
	• Equipment shall have appropriate mufflers, intake silencers, and noise-control features and would be properly maintained and equipped with exhaust that meet state standards Vehicle and other gas- or diesel-powered equipment would be prohibited from unnecessary warming up, idling, and engine revving. **Mitigation Measure NOI-2: Reduce Noise from Operation** To reduce noise impacts due to operation, the District will require construction contractors to include the use of noise attenuating devices or shielding, substitution of quieter equipment as defined by manufacturer specifications.			