

# **FIRST ADDENDUM TO THE SOUTH COUNTY RECYCLED WATER MASTER PLAN PROGRAM ENVIRONMENTAL IMPACT REPORT**

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## Introduction

In 2004, Valley Water and the South County Regional Wastewater Authority (SCRWA) jointly prepared the South County Recycled Water Master Plan, which defined immediate, short, and long-term projects to expand the use of recycled water in southern Santa Clara County, and in particular, the City of Gilroy (City). In 2011, Valley Water's Board of Directors certified the Final South County Recycled Water Master Plan Program Environmental Impact Report<sup>1</sup> (PEIR). The PEIR evaluated the installation of approximately 10 miles of recycled water transmission and distribution pipelines to convey water to users in Gilroy and surrounding vicinity.

The proposed project comprises three phases of pipeline installation: Short-Term Phase 1, Short-Term Phase 2, and Long-Term Projects (collectively referred to as the Project). A new segment, referred to as Phase 1C, not evaluated in the PEIR, has subsequently been added to the Project. This document, the First Addendum to the South County Recycled Water Master Plan PEIR, evaluates the Phase 1C addition to the Project.

## CEQA Considerations

When there are changes to a project and the lead agency will be taking discretionary action, the California Environmental Quality Act (CEQA)<sup>2</sup> provides various levels of documentation to indicate that the lead agency has adequately considered the changes in making its decision. Under CEQA Guidelines §15162(a), the appropriate level of review is based, among other factors, on whether the changes to the project or project circumstances, or new information of substantial importance that was not known at the time of approval of the original project, create new significant effects or result in a substantial increase in the severity of previously identified significant effects.

CEQA Guidelines §15164(a) provides for the use of an Addendum to document the basis for a lead agency's decision not to require a Subsequent EIR for a project that is already evaluated under a previously certified EIR. The lead agency's decision to use an Addendum must be supported by substantial evidence that the conditions that would trigger preparation of a Subsequent EIR, as provided in CEQA Guidelines §15162, are not present. As described in the following section, the proposed project would not create new significant effects or substantially increase the severity of previously identified effects. Therefore, preparation of a subsequent EIR is not required. Valley Water, as lead agency, has determined that an Addendum to the EIR is the appropriate level of review necessary to comply with CEQA. This Addendum will be considered by Valley Water in conjunction with the EIR when taking action on the proposed project addition. An Addendum need not be circulated for public review, but CEQA requires the decision-making body to consider the Addendum, together with the certified 2011 PEIR, prior to making a decision on approval of the South County Recycled Water Pipeline Project.

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<sup>1</sup> Final Program EIR for the South County Recycled Water Master Plan. SCH No. 2005112004. March 2011. Prepared by Recon Environmental.

<sup>2</sup> Public Resources Code §21000 *et seq.* and 14 California Code of Regulations §15000 *et seq.*

## Description of the Proposed Project Additions

The Phase 1C pipeline segment would include between approximately 3,180 linear feet (LF) to 3,500 LF of 18-inch diameter recycled water pipeline and associated appurtenances including control valves, isolation valves, air-release valves, turnouts, and blow-off assemblies. Appurtenances would be installed within subsurface vaults. Phase 1C would connect to another segment of the recycled water pipeline that would be installed under Phase 1B of the proposed project at its western end and an existing recycled water pipeline at its northern end. Relative to the entirety of the Project, which consists of approximately 10 miles or 52,800 feet of new recycled water pipeline, the Project additions represent an increase of approximately six percent in terms of overall pipeline length. Refer to Final PEIR Section 2.3, Figure 2-2 for a map of the Project as originally proposed.

As shown in **Figure 1**, the alignment would begin at an unnamed dirt roadway to the east of Luchessa Avenue and to the south of an existing warehouse. The alignment would generally run northeast traversing an agricultural field owned by the Green Valley Corporation, turn to the northwest to meet Cameron Boulevard, and continue northwest before briefly turning back to the northeast to follow an existing maintenance road parallel to the Princevalle Storm Drain until reaching its northerly terminus. The proposed northern portion of the alignment has been precisely determined and is also shown in **Figure 1**.

As of preparation of this Addendum, the precise location of the western portion of the Phase 1C alignment has not been determined due to uncertainties related to real estate acquisition. To account for this uncertainty, this document conservatively considers an area that reflects the entirety of the potential Phase 1C alignment, referred to as the potential alignment area. The potential alignment area for the western segment of the pipeline is approximately 11.4 acres in size and is displayed in **Figure 1**. The potential alignment area has uniform environmental characteristics (see Environmental Setting for additional details) and installation activities would occur within a small portion of the overall potential alignment area once a specific alignment is determined. Of total pipeline length, the northern portion of the alignment would be 980 LF in length and between approximately 3,180 LF to 3,500 LF in length within the potential alignment area depending upon the precise alignment.

The Phase 1C pipeline would be installed using a conventional cut and cover method at depths ranging from approximately 4 to 10 feet below ground. Installation would involve excavation of a trench approximately 5 feet wide along the length of alignment. Beyond the trenching area, construction would involve disturbance to approximately 40 feet along the alignment (i.e., approximately 20 feet on either side of the alignment) to accommodate equipment staging. Prefabricated pipeline segments would be placed in the trench and welded together. After placement of pipeline segments, excavated soils would be reused as backfill to the extent possible<sup>3</sup> and the ground surface would be restored to existing conditions. Four subsurface, precast vaults would be installed along the pipeline alignment to house pipeline appurtenances. Vault excavation depths would range from 10 to 18 feet and all vaults would be placed atop a concrete base slab poured at the bottom of the excavation pit. Three vaults would have an outer dimension of approximately 7.5 feet square (7.5 feet by 7.5 feet) and the remaining vault would have an outer dimension of 9 feet square (9 feet by 9 feet) and vault height would range from 10

<sup>3</sup> In the event that soil contamination is encountered, excavated soils would be disposed of according to applicable hazardous waste regulations and clean imported soil would be used as backfill.

feet to 18 feet. The 7.5-foot by 7.5-foot vaults would be buried with an access hatch flush with the finish surface when located in a roadway (2 vaults), and 1 foot above the surface when located outside of roadway (2 vaults). The larger vault would house a tee assembly for connection to the existing recycled water pipeline adjacent to the Princeville Storm Drain. This vault would be installed using a sheeting, shoring, and bracing system to provide enhanced soil stability in the vicinity of the Princeville Storm Drain. The larger vault would include an access hatch flush with the surface of the maintenance road. A concrete thrust block would be installed just to the northeast of the larger vault.

The exact timing of Phase 1C construction is uncertain, however a construction contract is anticipated to be awarded in November 2021. Construction activities would over a period of approximately three to four months. Construction equipment used during installation of the pipeline segments and vaults would include haul trucks, dump trucks, backhoes, hydraulic excavators, compactors, cranes, concrete mixers, and asphalt pavers. The Phase 1C pipeline segment and association components described in this section are referred to as the Project additions herein.

## Environmental Setting

The Project additions would be installed in an area of Gilroy characterized by agricultural and industrial land uses. The Phase 1C project area crosses farmland where no trees or permanent vegetation are present; however agricultural crops may be present seasonally. The potential alignment area for the western portion of the alignment is environmentally uniform such that it only encompasses an agricultural field with no variation in vegetation, wildlife habitat, slope, hydrology, or other characteristics. A distribution warehouse is present immediately north and east of the alignment. Princeville Storm Drain, an earthen drainage channel tributary to Llagas Creek, is located adjacent to the northern terminus of the pipeline. Ruderal vegetation is present along the maintenance road adjacent to the storm drain. One single family residence is located approximately 350 feet to the south of the Phase 1B and Phase 1C connection point.

## Environmental Analysis

The following section analyzes potential environmental impacts that could result from the proposed Project additions relative to the impacts identified in the 2011 PEIR. The scope of the environmental analysis in this Addendum is consistent with that of 2011 PEIR, which was based on the Appendix G checklist questions from the CEQA Guidelines at the time of PEIR preparation. Only those resource areas that have the potential to be affected by the proposed Project additions are discussed. As with the pipeline segments analyzed in the 2011 PEIR, the proposed Project additions would not impact mineral resources, paleontological resources, population and housing, and public services and utilities.

This section is structured according to the environmental resource areas analyzed in the 2011 PEIR. Potential impacts to land use/community character and environmental justice, agricultural resources, biological resources, cultural resources, geology and soils, hazardous materials, hydrology and water quality, noise and lighting, transportation and traffic, air quality, and greenhouse gasses have been identified. Table 1 in the Conclusion of this Addendum shows the impacts evaluated by the PEIR, PEIR level of impact, change in level of impact due to the Project additions, and the new level of impact with the Project additions. Based on the analyses presented

in this section, implementation of the proposed Project additions would not result in new significant environmental impacts beyond those identified in the PEIR.

## **Land Use/Community Character and Environmental Justice**

The PEIR did not identify impacts related to division of an established community, conflicts with a land use plan or policy, alteration of land use, conflicts with an applicable habitat conservation plan or natural community conservation plan, conflicts with other utilities, and environmental justice. Installation of the Project additions would occur entirely in an area designated as General Industrial in the City's General Plan<sup>4</sup> and installation of a recycled water pipeline is considered a compatible use for this designation. The Project additions are within the geographic boundary of the Valley Habitat Plan (VHP), a habitat conservation plan.

As with the pipeline segments analyzed in the PEIR, Phase 1C would be installed such that the entirety of the pipeline would be underground, with only some vault manhole covers visible minimally above grade. Construction would not conflict with other utilities. No disadvantaged or low income communities are located in the vicinity of the pipeline alignment and installation of the pipeline would benefit all populations and socio-economic levels within the service area. The Project additions would comply with the applicable conditions from the VHP (refer to the Biological Resources section of this Addendum for additional information about VHP conditions). Therefore, the Project additions would not result in impacts with respect to these land use and environmental justice considerations evaluated in the PEIR.

The PEIR identified a less than significant impact to aesthetics and visual resources due to staging and use of construction equipment that would be visible from residences, roads, and other public viewsheds. The Project additions would result in more construction activities occurring over a larger area than originally evaluated. However, the Phase 1C Project area is not of especially high aesthetic or visual quality due to the presence of industrial and agricultural land uses. Furthermore, the presence of construction equipment and construction related disturbances would be short-term and temporary in nature. Once installed, Project additions would have minimal to no effect on the aesthetic and visual quality of the vicinity. Therefore, the impact to aesthetics and visual resources would remain less than significant.

The PEIR identified potentially significant impacts related to access restrictions for private and industrial driveways due to construction in roadway right of ways (Significant Impact 3.2-1). Construction of Project additions would largely occur in an agricultural field and along Cameron Boulevard, adjacent to the warehouse. Construction along Cameron Boulevard has the potential to temporarily interfere with the driveways that provide access to the warehouse. Mitigation Measure 3.2-1 requires implementation of a site-specific traffic control plan to reduce the impact to a less-than-significant level. This plan would ensure that appropriate notice is given to property owners when construction would interfere with driveway access and include measures to minimize any access restrictions. Significant Impact 3.2-1 would remain less than significant with mitigation incorporated.

The PEIR also identified potentially significant impacts associated with traffic, noise, and air quality disruptions at recreational and open space areas in the vicinity of the Project area due

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<sup>4</sup> Gilroy, City of. Gilroy 2040 General Plan Land Use Diagram. December 2020.  
<https://www.cityofgilroy.org/DocumentCenter/View/11368>. Accessed August 4, 2021.

Phase 2 and Phase 3 construction activities (Significant Impact 3.2-2) and construction related removal of landscaping during Phase 2 (Significant Impact 3.2-3). The PEIR concluded that both impacts would be reduced to a less-than-significant level with implementation of mitigation. There are no open space areas or recreational facilities in the vicinity of the proposed Phase 1C alignment, and no ornamental landscaping is present. Significant Impacts 3.2-2 and 3.2-3 would not change due to the Project additions.

Therefore, the Project additions would not result in any new impacts or substantially increase the severity of previously identified impacts to land use/community character and environmental justice and no new mitigation measures would be required.

## **Agricultural Resources**

The PEIR did not identify impacts related to conversion of prime or unique farmland, or farmland of statewide importance, to non-agricultural uses; conflicts with zoning for agricultural use or a Williamson Act contract; and other changes which could result in conversion of farmland to non-agricultural use. Most of the Project additions would be installed through an existing agricultural field where crops may be present seasonally. The westernmost portion of the field is designated as farmland of statewide importance with the remainder designated as prime farmland.<sup>5</sup> The field is zoned as General Industrial by the City and is not under a Williamson Act contract.<sup>6</sup>

Construction would temporarily disturb between approximately 2 to 2.3 acres<sup>7</sup> of the farmland within the potential alignment area during trenching and pipeline installation activities, but the disturbed area would be restored to existing conditions after completion of construction. In the event that construction was to coincide with the growing season, construction activities would be coordinated with the landowner to minimize disturbance to agricultural resources. Therefore, the Project additions would result in less than significant impacts with respect to conversion of prime farmland and farmland of statewide importance, and no impact with respect to conflicts with zoning for agricultural use, Williamson Act contracts, and other changes which could result in conversion of farmland to non-agricultural use.

The EIR concluded that impacts related to adverse effects on tree crops and woody ornamental species due to application of recycled water that exceeds applicable water quality thresholds for salinity and boron level (Significant Impact 3.3-1) would be less than significant with mitigation incorporated. In the event that water conveyed by Phase 1C was applied to sensitive agricultural crops, Mitigation Measure 3.3-1 would be applied. Mitigation Measure 3.3-1 requires monitoring of adverse effects to sensitive species and adaptive management to avoid adverse effects, if necessary, and would reduce this impact to a less—than-significant level. Significant Impact 3.3-1 would remain less than significant with mitigation incorporated.

Therefore, the Project additions would not result in any new impacts or substantially increase the severity of previously identified impacts to agricultural resources and no new mitigation measures would be required.

<sup>5</sup> California Department of Conservation. California Important Farmland Finder. 2017. <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed August 10, 2021

<sup>6</sup> Santa Clara County Department of Planning and Development. Williamson Act Properties Map. <https://www.arcgis.com/apps/webappviewer/index.html?id=1f39e32b4c0644b0915354c3e59778ce>. Accessed August 10, 2021.

<sup>7</sup> Calculated area based on a pipeline length between 3,180 LF to 3,500 LF and an area of construction related disturbance of 40 feet wide along the alignment.

## Biological Resources

Phase 1C would be installed in the immediate vicinity of the original Project area screened for biological resources in the PEIR. Due to this proximity, potentially impacted biological resources would be comparable to those discussed in the PEIR.

The PEIR identified less than significant impacts to non-native herbaceous vegetation, developed land and agricultural land, oak woodland, and special status plant species. Construction of Phase 1C would occur in an area of low quality habitat for vegetation, with limited areas of ruderal vegetation present near the northern terminus of the proposed alignment. No oak woodlands or special status plant species are present in the Phase 1C Project area. Construction disturbances to non-native herbaceous vegetation, developed land, and agricultural land would be temporary in nature and limited to the construction phase of the Project. All impacted land covers and vegetation disturbed during construction would be restored to existing conditions. Therefore, the Project additions would result in a minor increase in impacts to non-native herbaceous vegetation, developed land, and agricultural land, and no change in impacts to oak woodland and special status plant species. These vegetation related impacts would remain less than significant.

The PEIR identified less than significant impacts to wildlife from residual pharmaceutical and personal care products (PPCPs) in recycled water. Any recycled water applied to crops or landscaping from the Project, including Phase 1C, would be filtered through the soil, with minimal runoff to the surrounding vicinity. To minimize the impact of any residual PPCPs, the PEIR cites compliance with Regional Water Quality Control Board Order 98-052 as a best management practice (BMP) that would reduce potential impacts to wildlife to a less-than-significant level. As with the Project as a whole, recycled water conveyed by Phase 1C would comply with Order 98-052, which regulates use and application of recycled water (refer to PEIR Section 2.3.1.4). With implementation of this BMP, impacts to wildlife from residual PPCPs would remain less than significant.

The PEIR identified less than significant impacts to wildlife movement, as construction activities have the potential to interrupt wildlife movement. Given that the entirety of the Phase 1C Project area is disturbed or developed, potential for wildlife movement is minimal. Construction would be phased such that only portions of the Project area would temporarily be impacted by construction at a given time, allowing wildlife opportunity to bypass construction disturbances. As a result, only a minimal and short-term adverse effect on wildlife movement would occur. Potential impacts to wildlife movement would remain less than significant.

The PEIR identified a less than significant impact to certain non-breeding special-status wildlife. Some special-status wildlife species may occur within the Phase 1C Project area, limited to uncommon non-breeding visitors (e.g., in winter), migrants, or transients. These species include the American peregrine falcon, golden eagle, northern harrier, bank swallow, olive-sided flycatcher, grasshopper sparrow, Bryant's savannah sparrow, and western red bat. These species are not expected to breed, occur regularly, or occur in large numbers within the Project area. As a result, the Project additions would not result in appreciable effects on regional populations of these species that occur only as occasional non-breeding visitors or foragers. Impacts non-breeding special-status wildlife would remain less than significant.

The PEIR identified a less than significant impact to white-tailed kite, loggerhead shrike, and yellow-breasted chat. Although these species could nest in the vicinity, nesting is unlikely due to

the lack of suitable nesting habitat within the Phase 1C Project area. In the unlikely event that these or other migratory birds are found in the Project area, Migratory Bird BMPs 1 through 3 would be implemented, which require avoidance of construction during the nesting season to the extent practical, pre-construction surveys, and active nest construction buffers (refer to PEIR Section 3.4.8.1). With implementation of these BMPs, impacts to white-tailed kite, loggerhead shrike, and yellow-breasted chat would remain less than significant.

The PEIR identified 12 potentially significant impacts related to biological resources, which are listed below.

- Significant Impact 3.4-1: Soil disturbance in the vicinity of a riparian corridor
- Significant Impact 3.4-2: Adverse effect on fish and aquatic wildlife species due to degradation of water quality
- Significant Impact 3.4-3: Adverse effect on Santa Clara red ribbons
- Significant Impact 3.4-4: Adverse effect on south-central California coast steelhead
- Significant Impact 3.4-5: Adverse effect on red-legged frogs
- Significant Impact 3.4-6: Adverse effect on California tiger salamanders
- Significant Impact 3.4-7: Adverse effect on least Bell's vireo
- Significant Impact 3.4-8: Adverse effect on Monterey roach
- Significant Impact 3.4-9: Adverse effect on western pond turtles
- Significant Impact 3.4-10: Adverse effect on burrowing owl
- Significant Impact 3.4-11: Adverse effect on pallid bats
- Significant Impact 3.4-12: Adverse effect on American badger

Of these impacts, several would not be associated with Phase 1C due to the characteristics of the Project area and lack of suitable habitat. Santa Clara red ribbons are not currently present nor is there suitable habitat for Santa Clara red ribbons in the Phase 1C Project area. Riparian habitat suitable for least Bell's vireo occupation or nesting and suitable roosting sites for special-status bats are also not present in the Phase 1C project area. Therefore, Significant Impacts 3.4-3, 3.4-7, and 3.4-11 would not be associated with the proposed project and their level of impact would not change as a result of the Project additions.

With respect to Significant Impacts 3.4-1 and 3.4-2, the northern terminus of Phase 1C would be constructed in the immediate vicinity of Princevalle Storm Drain. The storm drain is a man-made earthen channel and only experiences flow periodically in the event of precipitation. The habitat it provides is low quality, lacking the hydrological characteristics necessary to support riparian and aquatic species. Limited non-native vegetation is present within the channel along its banks and non-native grasses adjacent to the channel. There are no mature trees present. The Project additions are designed such that no work would occur within the storm drain and all excavation would occur beyond top of bank. As such, riparian and aquatic habitat in Princevalle Storm Drain would not be directly impacted. A sheeting, shoring, and bracing system would be utilized to contain excavation activities and stabilize soils where a vault would be installed to house the connection between Phase 1C and the existing recycled water pipeline, minimizing the potential for inadvertent discharge into the storm drain channel. Furthermore, implementation of PEIR Mitigation Measures 3.4-1a, 3.4-1b, and 3.8-1 would address potential impacts related to soil disturbance and degradation of water quality in the vicinity of the storm drain. Mitigation Measures 3.4-1a and 3.4-1b would require avoidance of riparian habitat and restoration of temporarily disturbed areas in the vicinity of riparian areas; Mitigation Measure 3.8-1 would require



implementation of a Stormwater Pollution Prevention Plan (SWPPP). Significant Impacts 3.4-1 and 3.4-2 would remain less than significant with mitigation incorporated.

Significant Impacts 3.4-4, 3.4-5, 3.4-6, 3.4-8, and 3.4-9 are specific to species with potential to occur in or near riparian and aquatic environments. Although the quality of habitat provided by the Princeville Storm Drain is low, there is a low probability that one or more of these species could be encountered during construction of the proposed Project additions. Implementation of Mitigation Measures 3.4-5a through 3.4-5e and 3.4-9 would require species-specific pre-construction surveys, avoidance measures, construction worker education, entrapment prevention, and other procedures to minimize species specific impacts. Mitigation Measure 3.8-1 would also reduce the potential for water quality degradation, which could indirectly impact aquatic and riparian species, by requiring implementation of a SWPPP during construction. Significant Impacts 3.4-4, 3.4-5, 3.4-6, 3.4-8, and 3.4-9 would remain less than significant with mitigation incorporated.

Significant Impacts 3.4-10 and 3.4-12 are specific to burrowing owl and American badger. Although unlikely given the disturbed nature of terrestrial habitat in the Phase 1 Project area, there is a low probability that one or both of these species may occur. Mitigation Measures 3.4-10aa through 3.4-10e would require burrowing owl pre-construction surveys and numerous avoidance measures in the event that burrowing owls were detected within 250 feet of construction areas. Mitigation Measures 3.4-12aa through 3.4-12c would require American badger pre-construction surveys and numerous avoidance measures in the event that American badger were detected within 300 feet of construction areas. Significant Impacts 3.4-10 and 3.4-12 would remain less than significant with mitigation incorporated.

Therefore, the Project additions would not result in any new impacts or substantially increase the severity of previously identified impacts to biological resources and no new mitigation measures would be required.

## **Cultural Resources**

The PEIR identified potentially significant impacts related to disturbance of prehistoric or culturally significant resources (Significant Impact 3.5-1) and Native American remains (Significant Impact 3.5-2). Although the PEIR did not consider the Phase 1C Project area during review of cultural resource records, the general vicinity was assessed. The PEIR determined that there are no known prehistoric or cultural resources located in the area screened east of the Monterey Highway for other Phase 1 pipeline segments. Phase 1C would be located east of the Monterey Highway and in the vicinity of other Phase 1 pipeline segments. The disturbed nature of the Phase 1C Project area reduces the potential for discovery of previously unknown cultural resources and human remains.

Although unlikely, an unanticipated discovery of cultural resources cannot be ruled out and Mitigation Measure 3.5-1 would be implemented in the event of an unanticipated discovery. A qualified archeologist would evaluate the find and implement a construction buffer of at least 50 feet. Similarly, Mitigation Measure 3.5-2 would be implemented in the event of an unanticipated discovery of Native American remains and would require coroner notification and preservation of the remains in a manner consistent with applicable requirements. Significant Impacts 3.5-1 and 3.5-2 would remain less than significant with mitigation incorporated.

Therefore, the Project additions would not result in any new impacts or substantially increase the severity of previously identified impacts to cultural resources and no new mitigation measures would be required.

## **Geology and Soils**

The PEIR identified less than significant impacts due to seismic ground shaking, fault rupture, and soil disturbance. Although the Project additions would be constructed in seismically active area, conformance with applicable codes and standards would reduce the potential for significant damage in the event of a strong earthquake. The Phase 1C Project area does not lie within a fault zone. Although construction would disturb soils, the PEIR cites compliance with the provisions of a Permit for Discharges of Storm Water Associated with Construction Activity, which would be acquired from the State Water Resources Control Board, as a BMP. Permit compliance would require measures such as stabilization of soils at the construction site and erosion prevention procedures. Impacts related to seismic ground shaking, fault rupture, and soil disturbance would remain less than significant.

The PEIR identified a potentially significant impact related to disturbance of serpentine soils during construction (Significant Impact 3.6-1). Although, soils in the vicinity of are primarily non-serpentinite in nature, pockets of serpentine soils are known to exist in the Phase 1C Project area. In the event that serpentine soils were encountered, Mitigation Measure 3.6-1 would be implemented to require appropriate handling of soils and construction techniques to minimize exposure to serpentine soils. Significant Impact 3.6-1 would remain less than significant with mitigation incorporated.

Therefore, the Project additions would not result in any new impacts or substantially increase the severity of previously identified impacts to geology and soils and no new mitigation measures would be required.

## **Hazardous Materials**

The PEIR identified less than significant impacts due to the presence of underground storage tanks (USTs) and generation of hazardous materials or waste. There are no known USTs within the Phase 1C Project area.<sup>8</sup> Given that the Project additions only involve installation of a recycled water pipeline, generation of hazardous materials or wastes would not occur and the likelihood of an uncontrolled release of hazardous materials that could contaminate soil, surface water, and groundwater would not increase. Impacts related to USTs and generation of hazardous materials or waste would remain less than significant.

Therefore, the Project additions would not result in any new impacts or substantially increase the severity of previously identified impacts related to Hazardous Materials and no new mitigation measures would be required.

## **Hydrology and Water Resources**

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<sup>8</sup> State Water Resources Control Board. Geotracker. 2021.

<https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=gilroy> (Accessed August 11, 2021)

The PEIR identified a less than significant impact related to redirection or impediment of flood flows. Although the Project additions would occur within a 100 year floodplain, installation of an underground pipeline would not alter the course of flood flows. This impact would remain less than significant.

The PEIR identified a potentially significant impact due to alteration of drainage patterns and erosion or siltation due to construction activities (Significant Impact 3.8-1). Excavation and installation activities would disturb soils and remove vegetation, which could create a higher volume of runoff and accelerate erosion of sediments into waterways. To reduce these potential impacts, Mitigation Measure 3.8-1 would require implementation of a SWPPP, which would include measures to prevent erosion, restrict construction activities to the dry season to the extent practical, and other requirements. Significant Impact 3.8-1 would remain less than significant with mitigation incorporated.

The PEIR also identified potentially significant impacts due to adverse effects to surface water quality (Significant Impact 3.8-2), groundwater quality (Significant Impact 3.8-3), PPCPs (Significant Impact 3.8-4), and N-Nitrosodimethylamine (NDMA) (Significant Impact 3.8-5). Although the quality of recycled water is addressed through standards set by Order 98-052, described above, the order does not address boron, chloride, sodium, total dissolved solids (TDS), salinity, PPCPs, or NDMA. As with use of recycled water from other Project pipeline segments, use of recycled water from Phase 1C with measurable quantities of these compounds could affect surface and groundwater quality. Mitigation Measures 3.8-2 and 3.8-3 would require implementation of a program to monitor surface and groundwater for concentrations of these pollutants where recycled water from the Project additions and Project as a whole is used. In the event that monitoring indicates that the concentration of these compounds is increasing, an adaptive management program would be established. Similarly, use of recycled water could impact surface and groundwater quality due to accumulation of PPCPs or NDMA. Mitigation Measures 3.8-4 and 3.8-5 would require implementation of measures to minimize the potential for these pollutants to enter surface or groundwater, monitor their concentrations where recycled water is applied and assuring applicable regulatory requirements designed to protect human health and the environment are met. Significant Impacts 3.8-2 through 3.8-5 would remain less than significant with mitigation incorporated.

Therefore, the Project additions would not result in any new impacts or substantially increase the severity of previously identified impacts to hydrology and water quality and no new mitigation measures would be required.

## **Noise and Lighting**

The PEIR identified potentially significant impacts due to noise (Significant Impact 3.9-1) and artificial lighting (Significant Impact 3.9-2) in the vicinity of sensitive receptors during nighttime construction. One sensitive receptor, a single family residence, is located approximately 350 feet south of western end of the Phase 1C potential alignment area. In the unlikely event that construction was to occur outside of normal daytime hours allowed by the City (7:00AM to 7:00PM), Mitigation Measure 3.9-1a would be implemented. These measures would require preapproval of nighttime construction activities by the City. Furthermore, Mitigation Measures 3.9-1b and 3.9-1c, which require Valley Water to provide advance notice of construction to sensitive receptors within 750 feet of the construction area and implementation of construction noise control measures, would apply in all circumstances. In the unlikely event artificial lighting would be

required, Mitigation Measure 3.9-2 would be implemented, which would require light to be shielded and directed away from sensitive receptors. Significant Impacts 3.9-1 and 3.9-2 would remain less than significant with mitigation incorporated.

Therefore, the Project additions would not result in any new impacts or substantially increase the severity of previously identified impacts related to noise and lighting and no new mitigation measures would be required.

## **Transportation and Traffic**

The PEIR identified less than significant impacts to transit service and bike and pedestrian facilities. Construction of the Project additions would involve minimal disruption to public right of ways. No transit services operate in the Phase 1C Project area and no bike or pedestrian facilities are present. These impacts would remain less than significant.

The PEIR identified the following potentially significant impacts related to traffic and transportation:

- Significant Impact 3.10-1: Reduced level of service (LOS) on arterial roadways
- Significant Impact 3.10-2: Reduced LOS on Luchessa Avenue
- Significant Impact 3.10-3: Impacts to driveways on Luchessa Avenue
- Significant Impact 3.10-4: Creation of safety hazards on minor streets due to construction equipment
- Significant Impact 3.10-5: Creation of safety hazards on Miller Avenue due to construction equipment
- Significant Impact 3.10-6: Impacts to bike lanes and pedestrian facilities on Luchessa Avenue
- Significant Impact 3.10-7: Reduced LOS on Santa Teresa Boulevard and Hecker Pass Highway

Project additions would not occur on or in the immediate vicinity of any arterial roadways, Luchessa Avenue, Miller Avenue, Santa Teresa Boulevard, or Hecker Pass Highway. Therefore, only Significant Impact 3.10-4 would be associated with the Project additions. Construction of the Project additions would temporarily disrupt Cameron Boulevard, a minor roadway to the east of the warehouse. Mitigation Measure 3.2-1 would require implementation of a site-specific traffic control plan, which would minimize disruptions and safety hazards on Cameron Boulevard. Significant Impact 3.10-4 would remain less than significant with mitigation incorporated.

Therefore, the Project additions would not result in any new impacts or substantially increase the severity of previously identified impacts related to transportation and traffic and no new mitigation measures would be required.

## **Air Quality**

The PEIR identified less than significant impacts related to emissions of air pollutants during construction and operation, generation of carbon monoxide and toxic air contaminants (TACs) and no impact with respect to generation of objectionable odors. The PEIR modeled construction and operational emissions and compared results to significance thresholds from the Bay Area Air Quality Management District (BAAQMD) for daily emission of reactive organic gasses (ROG),

nitrous oxides (NO<sub>x</sub>), particulate matter less than 10 microns in size (PM<sub>10</sub>) and particulate matter less than 2.5 microns in size (PM<sub>2.5</sub>) (refer to PEIR Section 3.11.5.4). Specifically, the PEIR applied significance thresholds of 54 pounds per day (lbs/day) for ROG, NO<sub>x</sub>, and PM<sub>2.5</sub> and a significance threshold of 82 lbs/per day for PM<sub>10</sub> for both construction and operational phases. The following emissions were estimated for the Project (all values approximate):

- ROG: 4.3 lbs/day (construction); 0.05 lbs/day (operation)
- NO<sub>x</sub>: 27.6 lbs/day (construction) 6.6 lbs/day (operation)
- PM<sub>10</sub>: 4.0 lbs/day (construction) 0.2 lbs/day (operation)
- PM<sub>2.5</sub>: 1.8 lbs/day (construction) 0.2 lbs/day (operation)

Based on these estimations from the PEIR, construction and operational emissions estimated for the Project would be substantially below BAAQMD significance thresholds. Construction and operation of the Project additions would result in an increase in daily air pollutant emissions. However, given that Phase 1C represents approximately a six percent increase relative to the overall Project, this increase would not be substantial enough to result in an exceedance of applicable thresholds for construction and operational emissions. Furthermore, construction of the Project additions would not occur simultaneously with construction of other phases of the Project, limiting the anticipated daily emission of air quality pollutants. Construction BMPs from the BAAQMD would be applied to the Project additions, which require site watering, proper tuning of equipment, minimization of idling, and other measures to reduce emission of air pollutants. Emissions of air pollutants during construction and operation would remain less than significant.

With regard to carbon monoxide and TACs, operation of construction equipment would generate these pollutants. However, construction at any single location within the Phase 1C project area would be temporary such that substantial concentrations of carbon monoxide and TACs would not accumulate. Impacts related to carbon monoxide and TACs would remain less than significant.

The Project additions would not increase the capacity of the wastewater treatment facility to process waste water and would not generate odors. No impact would occur with respect to generation of odors.

Therefore, the Project additions would not result in any new impacts or substantially increase the severity of previously identified impacts related to Air Quality and no new mitigation measures would be required.

## **Greenhouse Gasses**

The PEIR identified less than significant impacts due to generation of greenhouse gasses (GHGs) during construction and operation. The PEIR indicated that modeled construction and operational GHG emissions would be substantially below significance thresholds from BAAQMD (refer to PEIR Section 3.12.5.3). Specifically, the PEIR applied a significance threshold of 1,100 metric tons (MT) of carbon dioxide equivalents per year (CO<sub>2</sub>e/year) for both construction and operational phases. The PEIR estimated that Project construction would result in approximately 468 MT CO<sub>2</sub>e/year and that Project operation would result in approximately 691 MT CO<sub>2</sub>e/year. Construction and operation of the Project additions would result in an increase in GHG emissions. However, given that Phase 1C represents approximately a six percent increase overall pipeline length relative to the overall Project, this increase would not be substantial enough to result in an

exceedance of applicable thresholds for construction and operational emissions. Impacts due to GHGs during construction and operation would remain less than significant.

Therefore, the Project additions would not result in any new impacts or substantially increase the severity of previously identified impacts related to GHGs and no new mitigation measures would be required.

## Conclusion

Refer to **Table 1** for a summary of environmental impacts identified in the PEIR, change in the level of impact due to the Project additions, and new level of impact that reflects the proposed project changes. The Project additions would not result in any new significant effects or a substantial increase in the severity of previously identified significant effects.

**Table 1: Comparison of Environmental Impact**

Resource Area	Impact	EIR Level of Impact	Change in Level of Impact due to Addition of Phase 1C	Level of Impact with Addition Phase 1C
<b>Land Use, Community Character and Environmental Justice</b>	Potential to divide an established community	NI	No change	NI
	Conflict with an applicable land use plan, policy, or regulation	NI	No change	NI
	Alter the present or planned land use of the area	NI	No change	NI
	Conflict with an applicable habitat conservation plan or natural community conservation plan	NI	No change	NI
	Potential to conflict with other utilities	NI	No change	NI
	Environmental justice impacts	NI	No change	NI
	Impacts on aesthetics and visual resources	LTS	No change	LTS
	SI 3.2-1: Private and industrial driveway access	LTS with mitigation	Minor increase	LTS with mitigation
	SI 3.2-2: Construction related conflicts with events at recreational and open spaces areas	LTS with mitigation	No change	LTS with mitigation
	SI 3.2-3: Construction related impacts to landscaping	LTS with mitigation	No change	LTS with mitigation
<b>Agricultural Resources</b>	Convert prime or unique farmland, or farmland of statewide importance to non-agricultural uses	NI	Minor increase	LTS

<b>Resource Area</b>	<b>Impact</b>	<b>EIR Level of Impact</b>	<b>Change in Level of Impact due to Addition of Phase 1C</b>	<b>Level of Impact with Addition Phase 1C</b>
	Conflict with zoning for agricultural use or a Williamson Act contract	NI	No change	NI
	Involve other changes which could result in conversion of farmland to non-agricultural use	NI	No change	NI
	SI 3.3-1: Increased salinity and boron levels from application of recycled water	LTS with mitigation	No change	NI
<b>Biological Resources</b>	Impacts to non-native herbaceous vegetation, developed land and agricultural land	LTS	Minor increase	LTS
	Impacts oak woodland	LTS	No change	LTS
	Impacts to special status plant species	LTS	No change	LTS
	Impacts to wildlife from recycled water contaminants	LTS	No change	LTS
	Impacts to wildlife movement	LTS	Minor increase	LTS
	Impacts to non-breeding special status wildlife species	LTS	Minor increase	LTS
	Impacts to white-tailed kites, loggerhead shrikes and yellow-breasted chats	LTS	Minor increase	LTS



<b>Resource Area</b>	<b>Impact</b>	<b>EIR Level of Impact</b>	<b>Change in Level of Impact due to Addition of Phase 1C</b>	<b>Level of Impact with Addition Phase 1C</b>
	SI 3.4-1: Soil disturbance in the vicinity of a riparian corridor	LTS with mitigation	Minor increase	LTS with mitigation
	SI 3.4-2: Adverse effect on fish and aquatic wildlife species due to degradation of water quality	LTS with mitigation	Minor increase	LTS with mitigation
	SI 3.4-3: Impacts to Santa Clara red ribbons.	LTS with mitigation	No change	LTS with mitigation
	SI 3.4-4: Impacts to south-central California coast steelhead	LTS with mitigation	Minor increase	LTS with mitigation
	SI 3.4-5: Adverse effect on red-legged frogs	LTS with mitigation	Minor increase	LTS with mitigation
	SI 3.4-6: Impacts to California tiger salamanders	LTS with mitigation	Minor increase	LTS with mitigation
	SI 3.4-7: Impacts to least Bell's vireo	LTS with mitigation	No change	LTS with mitigation
	SI 3.4-8: Impacts to Monterey roach	LTS with mitigation	Minor increase	LTS with mitigation
	SI 3.4-9: Impacts to western pond turtles	LTS with mitigation	Minor increase	LTS with mitigation
	SI 3.4-10: Adverse effect on burrowing owl	LTS with mitigation	Minor increase	LTS with mitigation
	SI 3.4-11: Impacts to pallid bats	LTS with mitigation	No change	LTS with mitigation

<b>Resource Area</b>	<b>Impact</b>	<b>EIR Level of Impact</b>	<b>Change in Level of Impact due to Addition of Phase 1C</b>	<b>Level of Impact with Addition Phase 1C</b>
	SI 3.4-12: Adverse effect on American badger	LTS with mitigation	Minor increase	LTS with mitigation
<b>Cultural Resources</b>	SI 3.5-1: Disturbance to cultural resources	LTS with mitigation	Potentially minor increase	LTS with mitigation
	SI 3.5-2: Disturbance to Native American remains	LTS with mitigation	Potentially minor increase	LTS with mitigation
<b>Geology and Soils</b>	Impacts related to seismic ground shaking or fault rupture	LTS	No change	LTS
	Impacts related to soil disturbance	LTS	Minor increase	LTS
	SI 3.6-1: Impacts related to serpentine soils	LTS with mitigation	Potentially minor increase	LTS with mitigation
<b>Hazards and Hazardous Materials</b>	Impacts related to USTs	LTS	No change	LTS
	Generation of hazardous materials or wastes	LTS	No change	LTS
<b>Hydrology and Water Quality</b>	Impacts related to redirecting or impeding flood flows	LTS	No change	LTS
	SI 3.8-1: Cause alterations in drainage patterns or cause erosion/siltation	LTS with mitigation	Minor increase	LTS with mitigation
	SI 3.8-2: Adverse effects to surface water quality	LTS with mitigation	Minor increase	LTS with mitigation
	SI 3.8-3: Adverse effects to groundwater quality	LTS with mitigation	Minor increase	LTS with mitigation
	SI 3.8-4: Adverse effects due to PPCPs or EDCs	LTS with mitigation	Minor increase	LTS with mitigation
	SI 3.8-5: Adverse effects due to NDMA	LTS with mitigation	Minor increase	LTS with mitigation
<b>Noise and Lighting</b>	SI 3.9-1: Adverse effects on sensitive receptors due	LTS with mitigation	Potentially minor increase	LTS with mitigation

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<b>Resource Area</b>	<b>Impact</b>	<b>EIR Level of Impact</b>	<b>Change in Level of Impact due to Addition of Phase 1C</b>	<b>Level of Impact with Addition Phase 1C</b>
	to noise during night-time construction hours			
	SI 3.9-2: Adverse effects on sensitive receptors due to lighting during night-time construction hours	LTS with mitigation	Potentially minor increase	LTS with mitigation
<b>Transportation and Traffic</b>	Impacts to transit service	LTS	No change	LTS
	Impacts to bike and pedestrian facilities	LTS	No change	LTS
	SI 3.10-1: Decrease in LOS due to construction related road and lane closures	LTS with mitigation	No change	LTS with mitigation
	SI 3.10-2: Reduced LOS on Luchessa Avenue	LTS with mitigation	No change	LTS with mitigation
	SI 3.10-3: Impacts to driveways on Luchessa Avenue	LTS with mitigation	No change	LTS with mitigation
	SI 3.10-4: Creation of safety hazards on minor streets due to construction equipment	LTS with mitigation	Negligible Increase	LTS with mitigation
	SI 3.10-5: Creation of safety hazards on Miller Avenue due to construction equipment	LTS with mitigation	No change	LTS with mitigation
	SI 3.10-6: Impacts to bike lanes and pedestrian facilities on Luchessa Avenue	LTS with mitigation	No change	LTS with mitigation
	SI 3.10-7: Reduced LOS on Santa Teresa Boulevard and Hecker Pass Highway	LTS with mitigation	No change	LTS with mitigation

Resource Area	Impact	EIR Level of Impact	Change in Level of Impact due to Addition of Phase 1C	Level of Impact with Addition Phase 1C
<b>Air Quality and Greenhouse Gasses</b>	Impacts related to emissions of air pollutants during construction	LTS	Minor increase	LTS
	Impacts related to emissions of air pollutants during operation	LTS	Minor increase	LTS
	Generation of carbon monoxide	LTS	Minor increase	LTS
	Generation of toxic air contaminants	LTS	Minor increase	LTS
<b>Greenhouse Gasses</b>	Generation of GHG emissions during construction	LTS	Minor increase	LTS
	Generation of GHG emissions during operation	LTS	Minor increase	LTS

SI: Significant Impact

NI: No impact

LTS: Less than significant

## Report Preparation

This First Addendum was prepared by Nick Mascarello, Assistant Environmental Planner. The following staff also contributed to report preparation:

- Alex Hunt, Senior Water Resources Specialist
- Jomel Bautista, Associate Engineer
- Katrina Jessop, Associate Engineer
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## Figures

**Figure 1:** Phase 1C Alignment and Potential Alignment Area

## **Figure 1 – Phase 1C Alignment and Potential Alignment Area**



