

**RINCONADA WATER TREATMENT PLANT
RELIABILITY IMPROVEMENT PROJECT
Second Addendum to the Final Environmental Impact Report**

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1. Background

The Santa Clara Valley Water District (District), lead agency for the Rinconada Water Treatment Plant Reliability Improvement Project (Project), is in the process of constructing improvements at the Rinconada Water Treatment Plant (RWTP). The RWTP is the oldest of the District's water treatment plants was constructed in 1968 and has numerous plant components nearing the end of their useful lives. In addition, water quality and code requirements for potable water treatment have become more stringent, requiring that the RWTP be upgraded to ensure the reliability of its operation and water quality. The District has started construction to improve the existing water treatment processes and facilities at the RWTP through four principal modifications:

- 1) Addition of raw water ozonation facilities and processes;
- 2) Replacement of the existing water clarification process/facilities with conventional flocculation and sedimentation processes with plate settlers;
- 3) Removal and replacement of the water process filters; and
- 4) Increase in plant capacity from 80 million gallons per day (mgd) to a maximum of 100 mgd to provide an increase in peaking capacity for plant reliability.

The major facility elements of the project are detailed in Chapter 3 of the Environmental Impact Report (EIR).

Environmental impacts of the Project were evaluated in a Final EIR that was certified by the District Board of Directors in January 2015.

The first Addendum to the EIR was prepared in June 2016 to extend the hours of construction to allow work at the site to begin earlier and end later during weekdays. The objective of the change was to provide greater efficiencies in the daily scheduling of work and expedite the overall construction schedule. Construction hours were limited in the EIR from 8:00 a.m. to 5:00 p.m. on weekdays and were expanded to 7:00 a.m. to 6:00 p.m. Monday through Friday. This change went into effect in July 2016.

2. CEQA Considerations

Once the environmental review for a project has been conducted and the lead agency has adopted its findings with respect to impacts and proposed mitigation, these decisions need no additional review. The lead agency's role has been fulfilled unless there are changes to the project and further actions are necessary that involve the exercise of the lead agency's discretion regarding the project.

When there are changes to a project, and the lead agency is taking a discretionary action in regard to that change, California Environmental Quality Act (CEQA [Public Resources Code §21000 et seq. & 14 CCR §15000 et seq.]) provides various levels of documentation to indicate that the lead agency has adequately considered the environmental effects of the changes in making its decisions. The appropriate level of review is based on whether proposed changes to the project, changes to circumstances under which the project is undertaken, or new information not known at the time of approval of the project, would create or show new significant effects or a substantial increase in the severity of previously identified significant effects.

If proposed changes would result in new significant environmental effects or a substantial increase in severity of previously identified significant effects, CEQA Guidelines §15162 requires preparation of a Subsequent EIR. If none of the conditions specified in §15162 calling for preparation of a Subsequent EIR have occurred, CEQA Guidelines §15164(a) provides for the use of an Addendum. The lead agency's decision to use an Addendum must be supported by substantial evidence that the conditions that would trigger the preparation of a Subsequent EIR, as provided in CEQA Guidelines §15162, are not present.

As described in the analysis below, the proposed expansion of trucking hours during weekdays and greater use of the Granada Way entrance for the Project would not result in new significant impacts or a substantial increase in the severity of significant impacts identified in the certified EIR.

3. Description of Proposed Changes to the Project

In order to complete the project in a timely manner the District is considering actions to streamline work activities. These actions are to expand the hours that trucking is allowed to occur and to allow greater use of the Granada Way entrance.

The EIR assumed that trucking would occur during all hours of construction and the impact analysis was based on this assumption. During the EIR comment period the Los Gatos Public Works Department submitted a letter which stated "The Town will require that the hauling of soil on or off-site not occur during the weekday morning or evening peak periods (between 7:00 a.m. and 9:00 a.m. and between 4:00 p.m. and 6:00 p.m.) as well as during the periods when the Rolling Hill Elementary School is dismissed."

The District's response to this comment stated: "The District interprets this comment to mean that from 7 am-9 am and 4 pm-6 pm, the contractor will not be allowed to transport soil to or from the site, and will implement this recommendation. In addition, when school is in session, the District will require the contractor not to transport soil to or from the site for 30 minutes before and after the afternoon dismissal time." This commitment did not result in any changes to the text of the Final EIR, but was included in the contract specifications. Soil hauling trucks were limited to operate between 9 a.m. and 4 p.m., and other construction related trucks between 8 p.m. and 5 p.m. Monday through Friday. Failure to conform to these restrictions results in liquidated damages of \$500 per occurrence.

The route for all project-related traffic goes through the intersection of Pollard and More Avenue, where the Rolling Hills Middle School is located. All truck trips are restricted during the hours of morning pick-up and afternoon drop-off times from Rolling Hills Middle School, in response to Los Gatos' comment on the draft EIR. Hours for all construction truck trips which are not allowed are as follows:

- 8 a.m. to 9 a.m.
- 2:30 p.m. to 3:30 p.m. (excluding Wednesday)
- 1:30 p.m. to 2:30 p.m. (only Wednesday)

These restrictions to minimize traffic impact when school is in session were not modified in the First Addendum. To allow more work to be done on a daily basis the District is proposing to extend hours for all construction trucks for the duration of the project. The proposed new hours for all construction trucks are between 7 a.m. to 6 p.m. on workdays, with the following school-related restrictions:

- 8:15 a.m. to 8:45 a.m.
- 2:45 p.m. to 3:15 p.m. (excluding Wednesday)
- 1:45 p.m. to 2:15 p.m. (only Wednesday)

To better utilize construction areas on the project site, the District is also planning to use the entrance on Granada Way more than it has in the past. The EIR notes that this entrance would be used for “peak truck activity days,” however peak activities days is not defined. The Granada Way entrance would be used for construction worker parking and to provide greater flexibility in circulating trucks through the project site. The use of the Granada Way gate is consistent with the idea of additional access during peak activity times which includes the on-going grading and concrete work. The More Avenue entrance will continue to be the primary access point for construction vehicles.

4. Environmental Analysis

Extending the hours that construction trucks are permitted to access the site will allow more work to occur on a daily basis, but the proposal does not alter the work to be completed or the ultimate operation of the RWTP. As such, the only resource areas that may be affected by the extended work hours are air quality, noise, and traffic.

The proposal will not impact the following resource areas and they are not discussed further:

- Aesthetics
- Agricultural and Forest Resources
- Biological Resources
- Cultural Resources
- Geotechnical and Geological Hazards
- Greenhouse Gases
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use
- Public Services
- Utilities and Service Systems

These sections remained unchanged from the certified EIR.

The EIR was based on construction trucks being allowed to access the site during all regular work hours, which in the EIR was considered to be 8 a.m. to 5 p.m. The First Addendum prepared in June 2006 analyzed the potential impacts from expanding work hours to 7 a.m. to 6 p.m. The First Addendum concluded that the expansion of work hours, which included expanded hours of construction trucks, would not create new significant

environmental impacts or substantially increase the severity of significant impacts beyond those identified in the certified EIR.

As the EIR assumed truck trips during all construction hours the impacts to air quality, noise, and traffic already include the effects of truck traffic during morning pick-up and afternoon drop-off at Rolling Hills Middle School. The First Addendum expanded this analysis to include the periods from 7 a.m. to 8 a.m. and from 5 p.m. to 6 p.m. The EIR determined that there is no significant safety impact from truck traffic to the school. The District recently conducted a traffic study of the Pollard Road and More Avenue intersection (DKS, 2016) that reached the same conclusion. The Town of Los Gatos has reviewed the District's proposed new truck hours and the updated traffic study, and has not stated any objections to the changes.

The EIR concluded that limited sight distances at the More Avenue entrance to the RWTP posed a significant safety hazard to traffic on the road from trucks entering and exiting the site. The EIR established two mitigation measures to improve sight distance and the overall safety from construction traffic using the More Avenue entrance. Again, this analysis and related mitigation measures assumed truck traffic during all regular work hours. With the mitigation measures in place the EIR determined that the impact was reduced to a less than significant level.

5. Conclusion

Based on review of the extension of trucking hours, none of the conditions described in CEQA Guidelines §15162 would occur. The potential impacts of expanding trucking hours and Granada gate access are already fully considered and analyzed in the EIR certified by the District's Board of Directors. Extending the work hours would not create new for each mitigation measure, specify which entity will implement each action. Specify that the lead agencies will put biological mitigation requirements into construction contracts. Specify which agency would acquire conservation easements or compensation lands, if needed significant environmental impacts or substantially increase the severity of significant impacts beyond those identified in the certified EIR.