

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

June 2016

State Clearinghouse Number 2014012012
Project Number 93294057

Prepared by:
Michael Martin
Environmental Planner

Santa Clara Valley Water District
5750 Almaden Expressway
San Jose, California 95118-3614

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 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 product 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 EIR.

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

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, 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 changes to the project 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.

After an EIR has been certified for a project, if proposed changes to a project 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 construction hours during weekdays 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

Since the initiation of construction the contractor has requested an extension to the hours of work to begin earlier and end later during weekday construction. The objective of the change is 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. The new work hours will be 7:00 a.m. to 6:00 p.m. Monday through Friday. Work hours and limitation during weekends will not change.

4. Environmental Analysis

Extending the hours of construction 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.

Potential impacts to air quality, noise, and traffic and circulation as a result of the proposed extended hours have been identified. Based on this analysis implementation of the proposed extension of the hours of construction will not create new significant environmental impacts or substantially increase the severity of significant impacts beyond those identified in the certified EIR.

AIR QUALITY

The extension of hours would not affect the Project's consistency with adopted Air Quality Plans or with operational emissions; there is no change to the analysis in these areas.

Since there is no change to the work to be performed, the overall estimated construction emissions in Table 4.3-9 of the certified EIR would not change, or could possibly decrease if the construction schedule is reduced, and workers do not have to travel to and from the Project site for as many days.

The hours of construction would be increased from 9 hours to 11 hours on a daily basis. This would increase the estimated daily emissions reported in Table 4.3-9 of the certified EIR. Revised daily emissions are estimated in Table 1 below, which conservatively assumes a 22% increase in daily emissions consistent with the increase in work hours. While the daily construction hours will be lengthened by 22% per weekday, the activities that would occur during the extended hours include start up activities, site preparations, and logistics to construction work tasks. The majority of emissions are caused by activities including excavation with heavy equipment, heavy materials hauling, and concrete pouring and working which will continue to occur mostly during the previous 8 a.m. to 5 p.m. construction hours.

TABLE 1

	Estimated Construction Emissions Pounds per Day						
	ROG	NOx	PM ₁₀	PM _{2.5}	CO	SOx	CO _{2e}
Phase 1	2.07	21.35	3.94	2.57	15.43	0.02	2,084
Phase 2	4.33	25.34	1.67	1.20	13.05	0.02	2,735
Phase 3	1.51	15.53	1.50	0.92	10.81	0.02	1,911
Phase 4	2.83	6.11	0.74	0.44	5.90	0.01	1,058
Phase 5	1.32	6.15	0.60	0.34	5.14	0.01	1,067
BAAQMD Threshold	54	54	82	54	N/A	N/A	N/A
Exceed Threshold?	No	No	No	No	N/A	N/A	N/A

Daily emissions are still well below the significant thresholds, so the impact is still less than significant.

The EIR determined that uncontrolled PM_{2.5} emissions from dust generated during demolition, excavation, grading, and building activities would exceed the BAAQMD PM_{2.5} concentration based significance threshold of 0.3 ug/m³, which means sensitive receptors would be exposed to substantial fine particle pollutant concentrations. With the implementation of **Mitigation Measure AIR-1** the concentration is reduced to 0.185 ug/m³. Extending the construction work hours would result in a concentration of 0.226 ug/m³ which is still below the significance threshold and the impact would continue to be less than significant with implementation of the previously identified mitigation. The estimated increase in dust emissions is based on a conservative assumption that an increase of work hours by 22% would result in a 22% increase in dust emissions;

however, as described above, the activities contributing to the majority of emissions will continue to occur during the original 8 a.m. through 5 p.m. construction hours.

Construction equipment and heavy-duty truck traffic generates diesel particulate matter (DPM), which is a toxic air contaminant. These contaminants can result in excess cancer risk. The significance threshold for DPM is 10 in one million incremental cancer risk. The EIR determined that the maximally exposed individual from the Project would have an incremental cancer risk of 6.47 in one million for a young child and 0.62 in one million for an adult. Assuming the 22% increase in work over a year would result in an incremental cancer risk of 7.89 in one million for a young child and 0.76 in one million for an adult. These risks are still below the significance threshold and the impact is less than significant.

Increased construction hours would not result in any new significant impacts to air quality beyond those identified in the certified EIR or a substantial increase in the severity of a significant impact, and no new mitigation measures would be required.

NOISE

The extension of construction work hours would not affect operational noise, potential vibrations from construction, or impacts from aircraft noise; there is no change to the analysis in these areas.

As noted in the EIR the Town of Los Gatos municipal code restricts construction activities to the hours of 8:00 a.m. to 8:00 p.m. The proposed change in construction hours would allow construction to begin before 8:00 a.m. Government Code Section 53091(d) states that building ordinances of a city shall not apply to the location or construction of facilities for the production, generation, storage, treatment, or transmission of water, wastewater, or electrical energy by a local agency. Los Gatos has recognized that the limit to construction hours in the Town's code does not apply to this project.¹

Although not bound to the noise restrictions in the Town of Los Gatos Noise Ordinance, they were used as the threshold of significance for environmental impact review. Construction noise is considered significant if an individual piece of equipment exceeds 85 dBA L_{max} at 25 feet from the piece of equipment, or the noise level at any point outside of the property plane (boundary) exceeds 85 dBA L_{max} . With extended construction hours construction related noise will be similar, but extended one hour prior to, and one hour after, the hours of construction stated in the certified EIR. The proposal would result in two more hours of noise generating construction on a daily basis, but could reduce the total number of days of construction (and resulting noise) if the work can be completed sooner.

The EIR includes **Mitigation Measure NSE-2** to reduce construction related noise which requires an acoustical consultant to develop a Construction Noise Mitigation Plan and be on-call during construction to assist in complying and adaptively reposing to any noise issues that may arise. The measure also requires the installation of temporary noise barriers to meet the Town standard and other practices to minimize noise impacts. This

¹ Matt Morley, Town of Los Gatos Public Works Director, personal communication April 4, 2016

measure would be in place for the extended work hours and would reduce noise impacts during the extended hours to a less than significant level.

Increased construction hours would not result in any new significant impacts to noise beyond those identified in the certified EIR or a substantial increase in the severity of a significant impact, and no new mitigation measures would be required.

TRAFFIC AND CIRCULATION

The extension of construction work hours would not affect operational traffic, emergency access, air traffic, alternative transportation, traffic hazards, and parking (the number of workers / employees would not change); there is no change to the analysis in these areas.

Extending work hours will increase the number of trucks coming and going to the Project site on a daily basis, but will not alter the total number of truck trips over the entire Project or the number of workers / employees accessing the site on a daily basis. The average of 25 one-way trips per hour during peak truck traffic periods (when there is off-hauling of excavated materials or delivery of fill materials and concrete) is conservatively assumed to occur during the extended hours. The EIR concluded that these truck trips would not result in an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system. The same conclusion would apply for the additional hours of construction.

Although the EIR determined that truck traffic would have a less than significant impact to the local circulation system, the District included language in the contractor's specifications that restricts truck traffic during the school year. This further reduces traffic related impacts that could occur during drop-off and pick-up times at Rolling Hills Middle School. When school is in session truck traffic is not allowed as listed below:

- 8:00 a.m. – 9:00 a.m.
- 2:30 p.m. – 3:30 p.m. (Monday, Tuesday, Thursday, Friday)
- 1:30 p.m. – 2:30 p.m. (Wednesday)

This restriction will be maintained with the extended work hours.

Increased construction hours would not result in any new significant impacts to traffic beyond those identified in the certified EIR or a substantial increase in the severity of a significant impact, and no new mitigation measures would be required.

5. Conclusion

Based on review of the extension of work hours during weekdays to 7:00 a.m. to 6 p.m., none of the conditions described in CEQA Guidelines §15162 would occur. Extending the work hours would not create new significant environmental impacts or substantially increase the severity of significant impacts beyond those identified in the certified EIR.