

Draft

CEQA Addendum

Initial Study/Mitigated Negative Declaration

SCH No. 2015111032

City of Paso Robles Tertiary Treatment Project

Assessor Parcel Numbers: 008-021-006, 008-051-002, 008-051-004, and 008-051-026

Location: 3200 Sulphur Springs Road
Paso Robles, CA

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LIST OF ATTACHMENTS

- Attachment A 2015 Initial Study/Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program (On CD)
- Attachment B Updated CalEEMod Output (On CD)

SECTION 1

INTRODUCTION AND SUMMARY OF CONCLUSIONS

1.1 DETERMINATION

This document constitutes an Addendum to the December 2015 Initial Study/Mitigated Negative Declaration (2015 IS/MND) prepared for the City of Paso Robles Tertiary Treatment Facilities Project, hereafter referred to as the “Original Project”. This Addendum evaluates whether modifications to the Original Project, including the proposed recycled water delivery system for the California Department of Transportation (Caltrans), hereafter referred to as the “Proposed Project”, would result in any new or substantially more adverse significant effects or require any new or modified mitigation measures not identified in the 2015 IS/MND (see 2015 IS/MND and Mitigation Monitoring Program included as Attachment A.)

As described in the 2015 IS/MND, the Original Project includes the construction of a flow diversion box, flow equalization tanks, cloth media filtration, ultra-violet (UV) disinfection, recycled water pump station, and a recycled water storage pond within the existing developed footprint of the City of Paso Robles Wastewater Treatment Plant (WWTP). The purpose of the Original Project and the Proposed Project is to meet the growing demand for recycled water in the city of Paso Robles. Under the Proposed Project, the recycled water would also be used for landscaping and utility purposes throughout the plant and along the U.S. Highway 101 corridor adjacent to the WWTP property. The WWTP has an existing pipeline in place for the delivery of recycled water within the plant; however, a new short pipeline extension would need to be constructed to facilitate the delivery of recycled water to Caltrans for irrigation purposes along the U.S. Highway 101 corridor. Therefore, the Proposed Project includes the construction and operation of a new pipeline extension adjacent to the WWTP property to deliver recycled water to Caltrans.

As verified in this Addendum, the Proposed Project would increase the scope of the development footprint (site disturbance) from that of the Original Project to accommodate for the new pipeline extension beyond the impact footprint identified in the 2015 IS/MND. The revised project impact area is shown in Figure 1. The new pipeline would be approximately four inches in diameter, extending approximately 100 feet beyond the 2015 IS/MND impact area. The excavation for the extension pipeline would be a trench approximately 100 feet long, 4 feet deep, and 2 feet wide, connected to existing subsurface infrastructure. The area of disturbance associated with the construction of this trench is expected to be approximately 15 feet wide and 100 feet long, totaling 1,500 square feet (0.03 acre) of new disturbance. Recycled water distribution would also be connected to existing infrastructure within the facility for on-site recycled water demands for irrigation and utility purposes. The area of new disturbance associated with the Proposed Project is entirely composed of landscaped/developed space (refer to Figure 2); therefore, implementation of the Proposed Project would not result in any new or increased impacts to natural habitats.

As “Lead Agency”, and as part of the City’s due diligence, the City required a full analysis of the Proposed Project to determine if it would result in any new or more severe significant effects not identified in the 2015 IS/MND. Based on this analysis of the scope of the Proposed Project as compared to the Original Project, none of the criteria specified in State CEQA Guidelines Section 15162 is triggered; therefore, a subsequent MND or supplemental environmental document is not required to be prepared.

Figure 1. Revised Facilities Map



Figure 2. Revised Habitat Map



In particular, there have been no: (1) substantial changes in the project that will require major revisions to the previous IS/MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effect; (2) substantial changes with respects to the circumstances under which the Proposed Project is undertaken that will require major revisions to the previous IS/MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effect; and (3) new information of substantial importance that was not known and could not have been known at the time the previous IS/MND was adopted that shows: (a) the Proposed Project would have significant effects not discussed in the previous IS/MND; (b) the Proposed Project would have more severe environmental effects; or (3) mitigation measures previously found to be infeasible or new mitigation measures now exist and would be feasible and would reduce significant effects. Therefore, an Addendum is the proper document to analyze the environmental effects of the Proposed Project as compared to the Original Project as provided for in State CEQA Guidelines Sections 15162 and 15164.

This Addendum incorporates the mitigation measures detailed in the 2015 IS/MND. With the incorporation of this mitigation, no significant impacts will result from the Proposed Project and no new or increased significant impacts will result from the Proposed Project. Also, no new or modified mitigation is available, and all impacts will be reduced with the existing mitigation measures.

1.2 BACKGROUND

The Original Project was formally evaluated in an IS/MND prepared in 2015 for the City of Paso Robles Tertiary Treatment Facilities Project. The 2015 IS/MND was prepared pursuant to the California Environmental Quality Act (CEQA) and it was adopted by the City of Paso Robles (City) in full compliance with CEQA.

After the adoption of the 2015 IS/MND and the City's approval of the Original Project, a new recycled water supply extension line was proposed to deliver recycled water to Caltrans for irrigation purposes along the U.S. Highway 101 corridor. Therefore, the City has proposed amendments to the Original Project as detailed in the scope of the Proposed Project. In particular, the Proposed Project would include all of the proposed facilities, construction, and operation activities associated with the Original Project, as detailed in the 2015 IS/MND in addition to the construction and operation of the new recycled water supply extension line.

The new pipeline would be approximately four inches in diameter, extending approximately 100 feet beyond the WWTP property boundary. The excavation for the extension pipeline would be a trench that is approximately 100 feet long, 4 feet deep, and 2 feet wide. The area of disturbance associated with the construction of this trench is expected to be approximately 15 feet wide and 100 feet long, totaling 1,500 square feet (0.03 acre) of new disturbance. Recycled water distribution would also be connected to existing infrastructure within the facility for on-site recycled water demands for irrigation and utility purposes. The area of new disturbance associated with the Proposed Project is entirely composed of landscaped/developed space (refer to Figure 2); therefore, implementation of the Proposed Project would not result in any new or increased impacts to natural habitats.

1.3 PURPOSE OF THIS ADDENDUM

The purpose of this Addendum is to analyze the incremental difference in environmental effects between the Proposed Project and the Original Project. As documented in this Addendum, none of the triggering conditions in State CEQA Guidelines Section 15162 have been met requiring the need for a subsequent IS/MND. This Addendum, together with the 2015 IS/MND, will be used by the City when considering approval of the Proposed Project.

1.4 CEQA FRAMEWORK FOR ADDENDUM

State CEQA Guidelines Sections 15162 and 15164 provide that an Addendum to an adopted IS/MND may be prepared if none of the conditions triggering a subsequent Negative Declaration are present. A subsequent IS/MND would be necessary if one or more of the following has occurred:

- Substantial changes are proposed for the project that will require major revision of a previous Negative Declaration due to the involvement of new, significant environmental effects or a substantial increase in the severity of previous identified effects;
- Substantial changes with respect to the circumstances under which the project is undertaken, requiring major revision to a previous Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified ones;
- New information of substantial importance that was not known or could not have been known without the exercise of reasonable diligence at the time the previous ND was adopted shows any of the following:
 - The project will have one or more significant effects not discussed in the previous ND.
 - Significant effects previously examined will be substantially more severe than disclosed in the previous ND.
 - Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt them.
 - Mitigation measures or alternatives that are considerably different from those analyzed in the previous document would substantially reduce one or more significant effects, but the project proponents decline to adopt the measures or alternative.

SECTION 2

PROJECT INFORMATION

2.1 SUMMARY OF ORIGINAL PROJECT

2.1.1 Project Location

The project location evaluated in the 2015 IS/MND included the City's WWTP located in the northern portion of the city of Paso Robles. The WWTP property consists of four parcels (Assessor's Parcel Numbers: 008-021-006, 008-051-002, 008-051-004, and 008-051-026) totaling approximately 69 acres, located at 3200 Sulphur Springs Road in Paso Robles, San Luis Obispo County, California. The primary entrance to the site is from U.S. Highway 101 and Sulphur Springs Road.

The project site is zoned Commercial/Light Industrial with a General Plan land use designation of Public Facility/Salinas River Overlay. The property is developed with approximately 52 acres of existing WWTP facilities. The property is bordered by the U.S. Highway 101 to the west, the Salinas River to the east, and open space to the north and south.

2.1.2 Summary of Original Project Description

The Original Project consisted of constructing tertiary treatment facilities at the existing WWTP. The new tertiary treatment facilities would produce tertiary 2.2 quality recycled water, as defined by California's Title 22 recycled water regulations, to provide for recycling of some or all of the water currently being discharged to the Salinas River in an effort to support the use of recycled water and facilitate groundwater recharge in the Paso Robles Groundwater Basin.

The tertiary treatment facilities associated with the Original Project include the addition of cloth media filtration and ultraviolet (UV) disinfection facilities, a flow diversion box, flow equalization tanks, a recycled water pump station, and a recycled water storage pond. These new facilities which would produce up to 4.9 million gallons per day (mgd) of tertiary 2.2 quality recycled water for unrestricted reuse. In the time period of 1 to 10 years after completion of the project, up to approximately 650 acre feet per year (afy) (or less than 20% of the annual volume that is currently discharged to the Salinas River) may be diverted from the secondary clarifiers in the existing treatment system (which currently discharges to the Salinas River), to the tertiary treatment system in the WWTP to be recycled. After 10 years, the percentage of wastewater discharged to the river would gradually decrease, depending on the growth of demand for recycled water. Within approximately 20 years, up to 90% of the annual volume of wastewater treated by the City may be recycled. The existing polishing channel would remain in place to allow for continued permitted discharge of treated wastewater into the Salinas River when the plant influent flow is greater than the recycled water demand or during the wet season when there is no demand for recycled water.

An MND was adopted for the Original Project by the City of Paso Robles Community Development Director in December 2015. A Mitigation Monitoring and Reporting Program was approved with the IS/MND. Mitigation topics focused on aesthetics, air quality, biological resources, hazards and hazardous materials, and noise.

2.2 SUMMARY OF PROPOSED PROJECT

2.2.1 Proposed Project Description

The Proposed Project includes development of the Original Project; however, the project description has been modified to include the construction and operation of a new recycled extension pipeline to supply recycled water to Caltrans for irrigation purposes along the U.S. Highway 101 corridor. Recycled water distribution would also be connected to existing infrastructure within the facility for on-site recycled water demands for irrigation and utility purposes.

2.3 COMPARISON OF THE ORIGINAL AND PROPOSED PROJECT

As noted above, the Proposed Project includes the Original Project. The only difference between the Original Project and the Proposed Project is the addition of the new 100-foot long recycled water extension line to provide recycled water to Caltrans. The new pipeline would be approximately four inches in diameter, extending approximately 100 feet beyond the 2015 IS/MND impact area. The excavation for the extension pipeline would be a trench that is approximately 100 feet long, 4 feet deep, and 2 feet wide. The area of disturbance associated with the construction of this trench is expected to be approximately 15 feet wide and 100 feet long, totaling 1,500 square feet (0.03 acre) of new disturbance.

To determine the Proposed Project's relative changes in potential environmental impacts from the Original Project, the City as Lead Agency, required a comprehensive analysis to document changes in potential impacts. The conclusions of analysis demonstrate that the Proposed Project would not result in increased environmental impacts compared to those that were analyzed in the adopted IS/MND for the Original Project.

SECTION 3

ANALYSIS OF POTENTIAL ENVIRONMENTAL EFFECTS

The City reviewed the previously adopted 2015 IS/MND for the Original Project in conjunction with the current proposal (Proposed Project) and determined that the proposed modifications described in this Addendum would not result in any new or significantly adverse environmental impacts or a substantial increase in severity of previously identified significant effect. The comparison is outlined in the following sub-sections.

3.1 AESTHETICS

As discussed in the 2015 IS/MND, the Original Project was expected to result in a potentially significant impact associated with creating a new source of substantial light or glare, which could adversely affect day or nighttime views in the area. Mitigation was included in the 2015 IS/MND, which required the development of an exterior lighting plan to minimize potential impacts to be less than significant.

The only new development component associated with the Proposed Project is the new recycled water extension line to supply recycled water to Caltrans for irrigation purposes along the U.S. Highway 101 corridor. The entire extension line would be developed below ground surface and would not be visible following completion of construction activities. The Proposed Project would not result in a new source of light or glare compared to what was described under the Original Project and the mitigation measures included in the 2015 IS/MND would continue to be implemented under the Proposed Project; therefore, no new significant impacts to aesthetics would occur and no new mitigation measures are required.

3.2 AGRICULTURE AND FORESTRY RESOURCES

As discussed in the 2015 IS/MND, the Original Project was not expected to result in any potentially significant impacts associated with agriculture or forestry resources and no mitigation was required.

The only new development component associated with the Proposed Project is the new recycled water extension line to supply recycled water to Caltrans for irrigation purposes along the U.S. Highway 101 corridor. The entire extension line would be developed within landscaped/developed land and would not result in impacts to agriculture or forestry resources; therefore, no new significant impacts to agriculture or forest resources would occur and no new mitigation measures are required.

3.3 AIR QUALITY

As discussed in the 2015 IS/MND, San Luis Obispo County is a non-attainment area for the state standards for ozone and suspended particulate matter. The APCD administers a permit system to ensure that stationary sources do not collectively create emissions, which would cause local and state standards to be exceeded. The 2015 IS/MND concluded that implementation of the Original Project has the potential to generate emissions during construction (short-term emissions) and during operation of the proposed facilities (long-term emissions).

Estimated construction and operational air emissions were calculated for the Original Project using the California Emissions Estimator Model (CalEEMod) based on an impact area of

approximately 73,981 square feet (1.7 acres) associated with the development of the proposed facilities. The results of the CalEEMod indicated that even under the worst-case scenario conditions, construction air emissions would be in compliance with the APCD thresholds for all pollutants during construction year 2017. However, implementation of mitigation measures was required to ensure that construction activities would not result in significant impacts associated with exposure to asbestos-containing materials, naturally occurring asbestos, and fugitive dust. The CalEEMod results also indicated that even under the worst-case scenario conditions, operational air emissions would be in compliance with the APCD thresholds for all pollutants during operational year 2018. The 2015 IS/MND also concluded that the Original Project has the potential to expose sensitive receptors to substantial pollutant concentrations due to the proximity to a residential area. The mitigation measures included in the 2015 IS/MND were considered sufficient to minimize these potential impacts to be less than significant.

Under the Proposed Project, an additional 1,500 square feet (0.03 acre) of land would be disturbed to construct the new extension line, resulting in a total disturbance area of 75,481 square feet (1.73 acres). Operation of the new extension line would not generate substantial operational emissions. Considering construction and operation emissions associated with the Original Project were conservatively estimated and were still well below the APCD thresholds, emissions associated with the construction of the new trench and operation of the new extension line would not result in an exceedance of any thresholds. Additionally, the Proposed Project includes the implementation of all mitigation measures included in the 2015 IS/MND, which are sufficient to mitigate any potential impacts associated with the Proposed Project; therefore, no new significant impacts to air quality would occur and no new mitigation measures are required.

CalEEMod was used to re-calculate estimated construction air emissions for the Proposed Project, including all construction activities associated with the Original Project in addition to those required for the new recycled water extension line (CalEEMod 2016). The results of the CalEEMod are included in Attachment B. The results of the unmitigated estimated construction emission calculations for the proposed project are shown in Table 1 below. It should be noted that the results are based on conservative estimations provided by the City and by the CalEEMod defaults.

Table 1. CalEEMod Results: Estimated Construction Emissions (Unmitigated)

Pollutant	APCD Threshold Daily (lbs/day)	APCD Threshold Quarterly Tier 1 (tons/quarter)	APCD Threshold Quarterly Tier 2 (tons/quarter)	Estimated Construction Emissions (Unmitigated) ¹	
				Project Maximum Daily Emission ² (lbs/day)	Project Quarterly Emission (tons/quarter)
ROG* + NO _x (combined)	137 lbs	2.5 tons	6.3 tons	67.97 lbs	0.91 tons
Diesel Particulate Matter (DPM)	7 lbs	0.13 tons	0.32 tons	6.34 lbs	0.08 tons
Carbon monoxide (CO)	--	--	--	55.45 lbs	0.86 tons
Fugitive Particulate Matter (PM ₁₀), Dust ³	--	2.5 tons	--	11.86 lbs	0.09 tons

¹ Construction emissions are estimated based on information from the City as well as the defaults used by CalEEMod. These are conservative estimations and may not be accurate based on the final design and construction plans for the proposed project.

² Showing Maximum Daily Emission from construction year 2017.

³ No APCD threshold identified for construction emissions.

⁴Any project with a grading area greater than 4.0 acres of worked area can exceed the 2.5 ton PM₁₀ quarterly threshold.

*ROG = reactive organic gases.

Source: CalEEMod 2016.

Based on the results shown in Table 1, even under the worst-case scenario conditions, construction air emissions associated with the Proposed Project would be in compliance with the APCD thresholds for all pollutants during construction year 2017.

Estimated operational air emissions were also re-calculated for the Proposed Project using the CalEEMod (CalEEMod 2016). The results of the CalEEMod are included in Attachment B. The results of the unmitigated estimated operational emission calculations for the Proposed Project are shown in Table 2 below. It should be noted that the results are based on conservative estimations provided by the City and by the CalEEMod defaults.

The threshold criteria established by the APCD to determine the significance and appropriate mitigation level for long-term operational emissions (i.e., vehicular and area source emissions) from the project are presented in Table 2. Emissions that equal or exceed the designated threshold levels are considered potentially significant and should be mitigated. As shown in Tables 1 and 2, the level of analysis and mitigation recommended follows a tiered approach, based on the overall amount of emissions generated by the project. For projects requiring air quality mitigation, the APCD has developed a list of both standard and discretionary mitigation strategies tailored to the type of project being proposed (i.e., residential, commercial, or industrial).

Table 2. CalEEMod Results: Estimated Operational Emissions (Unmitigated)

Pollutant	APCD Threshold Daily (lbs/day)	APCD Threshold Annual (tons/year)	Estimated Operation Emissions (Unmitigated) ¹	
			Project Maximum Daily Emission ² (lbs/day)	Project Annual Emission (tons/year)
ROG + NO _x (combined)	25 lbs	25 tons	5.35 lbs	0.86 tons
Diesel Particulate Matter (DPM)	1.25 lbs	--	.01 lbs	.001 tons
Carbon Monoxide (CO)	550 lbs	--	6.64 lbs	0.76 tons
Fugitive Particulate Matter (PM ₁₀), Dust ³	25 lbs	25 tons	.001 lbs	.00002 tons

¹ Construction emissions are estimated based on information from the City as well as the defaults used by CalEEMod. These are conservative estimations and may not be accurate based on the final design and construction plans for the proposed project.

² Showing Maximum Daily Emission from operational year 2018.

Source: CalEEMod 2016.

Based on the results shown in Table 2, even under the worst-case scenario conditions, operational air emissions would be in compliance with the APCD thresholds for all pollutants during operational year 2018. Operational emissions and activities are not anticipated to create a nuisance for surrounding sensitive receptors. Therefore, operational impacts would be less than significant and mitigation measures are not required for long-term operational emissions associated with the Proposed Project.

The Proposed Project includes the implementation of all mitigation measures included in the 2015 IS/MND, including the APCD Tier 2 standard mitigation measures to address potential public exposure to diesel particulate matter (which would not be substantially increased by the proposed minor project amendment, due to the location of the proposed pipeline on the west side of the facility), the requirements of the National Emission Standard for Hazardous Air Pollutants, compliance with the California Air Resources Board Airborne Toxics Control Measure, and standard dust control mitigation measures. Implementation of the mitigation measures included in the 2015 IS/MND is sufficient to mitigate any potential impacts associated with the Proposed Project; therefore, no new significant impacts to biological resources would occur and no new mitigation measures are required.

3.4 BIOLOGICAL RESOURCES

As discussed in the 2015 IS/MND, the Original Project is considered to have the potential to result in the following significant but mitigable impacts:

- The Original Project has the potential to result in direct and indirect impacts to 14 special-status animals and migratory birds, if present, through direct injury, mortality and habitat modification associated with proposed construction and operation activities.
- The Original Project has the potential to result in indirect operational impacts to the Salinas River and associated riparian habitat through the reduced volume of wastewater discharge.

The Proposed Project has the potential to result in indirect impacts, such as noise pollution, to a variety of nesting migratory birds that have the potential to utilize the Salinas River migratory riparian corridor. Mitigation measures were included in the 2015 IS/MND to minimize potential impacts to candidate, sensitive, and special-status species identified as having the potential to occur in the project vicinity or be impacted by the Original Project, as well as potential impacts to riparian habitat and migratory wildlife corridors.

As discussed previously, the only new development component associated with the Proposed Project is the new recycled water extension line to supply recycled water to Caltrans for irrigation purposes along the U.S. Highway 101 corridor. The entire extension line would be developed within landscaped/developed land within the previously surveyed biological study area (refer to Figure 2) and would not result in new or increased impacts to or loss of habitat. The reduction of wastewater discharge to the Salinas River and associated impacts would be the same under the Proposed Project as what was described under the Original Project. Similar to the Original Project, construction of the Proposed Project would generate construction noise associated with the excavation of the new trench and installation of the new extension line. Based on the location of the proposed extension line, distance from the Salinas River (approximately 600 feet), and minimal additional area of disturbance (0.03 acre), impacts to biological resources associated with construction noise resulting from the Proposed Project would be consistent with impacts evaluated in the 2015 IS/MND.

The Proposed Project includes the implementation of all mitigation measures included in the 2015 IS/MND, including the preparation and implementation of a SWPPP, a Spill Prevention and Contingency Plan, preconstruction surveys, and additional measures intended to avoid and/or reduce potential impacts to special status species and aquatic habitat located within or adjacent to the BSA. Implementation of the mitigation measures included in the 2015 IS/MND is sufficient to mitigate any potential impacts associated with the Proposed Project; therefore, no new significant impacts to biological resources would occur and no new mitigation measures are required.

3.5 CULTURAL RESOURCES

As discussed in the 2015 IS/MND, the Original Project would not result in any potentially significant impacts associated with cultural resources and no mitigation was required.

Based on the cultural resources setting information provided in the Cultural Resources Survey for the Paso Robles Wastewater Treatment Plant Upgrade Project, prepared by SWCA in 2009 (SWCA 2009), neither the WWTP property, nor any of the individual buildings, structures, sites, or features is eligible for listing in the National Register of Historic Places (NRHP) or the California Register of Historic Resources (CRHR), either separately or as a contributor to a larger historic district.

The property is not associated with any significant event or trend in American history. The property has not been directly associated with persons significant in our past. The buildings and structures on the property are utilitarian resources that are ubiquitous to industrial operations; they do not embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, nor do they represent a significant and distinguishable entity whose components lack individual distinction. Lastly, the property is not expected to yield important information about prehistory or history. Therefore the property is not considered a historic property, as defined in Section 106 of the National Register of

Historic Places, nor does it qualify as a historical resource under the California Environmental Quality Act. Therefore, no impact would occur.

The area of potential effect (APE) of the Proposed Project is the same as that of the Original Project. As shown in Figure 2, the new recycled water extension line would be constructed on landscaped/developed land within the previously surveyed APE. All construction and operation activities associated with the new recycled water extension line would be located in previously disturbed soils. No cultural resources have been identified in this area. The Proposed Project would not result in new or increased impacts to cultural resources and no new mitigation measures are required.

3.6 GEOLOGY AND SOILS

As discussed in the 2015 IS/MND, the Original Project was considered to have the potential to result in a significant impact associated with soil erosion. The 2015 IS/MND included mitigation in the form of construction best management practices (BMPs) to avoid and minimize soil loss and erosion with a construction Stormwater Pollution Prevention Plan (SWPPP) in conjunction with project's final design and grading plan.

Construction of the proposed extension line would result in an additional 1,500 square feet (0.3 acre) of disturbance within soils designated as moderately erodible, resulting in a total disturbance area of 75,481 square feet (1.73 acres). This is not a substantial increase in disturbed area; therefore, impacts would be consistent with those evaluated in the 2015 IS/MND. The Proposed Project includes the implementation of all mitigation measures included in the 2015 MND, which are sufficient to mitigate any potential impacts associated with the Proposed Project; therefore, no new significant impacts associated with geology or soils would occur and no new mitigation measures are required.

3.7 GREENHOUSE GASES

As discussed in the 2015 IS/MND, the CalEEMod was used to calculate estimated project construction and operational emissions. Based on the results of the CalEEMod, operation of the Original Project was expected to have a maximum annual CO₂e emission (unmitigated) of approximately 224.28 MT CO₂e/year. This estimate included operational emissions (206.27 MT) and amortized construction emissions (18.01 MT based on a 25-year life span for a conservative estimate). Therefore, operational emissions were not expected to generate GHG emissions that would exceed the established APCD threshold of 1,150 MT CO₂e/year and no mitigation was proposed.

As discussed previously under Section 3.3. Air Quality, the CalEEMod was used to recalculate estimated construction and operational emissions for the Proposed Project, including all construction and operation activities associated with the Original Project in addition to those required for the new recycled water extension line. Based on the results of the CalEEMod, as shown in Table 3 below, operation of the proposed project is expected to have a maximum annual CO₂e emission (unmitigated) of approximately 228.24 MT CO₂e/year. This estimate includes operational emissions (210.23 MT) and amortized construction emissions (18.01 MT based on a 25-year life span for a conservative estimate). Therefore, operation emissions would not generate GHG emissions that would exceed the established APCD threshold of 1,150 MT CO₂e/year.

Table 3. CalEEMod Results: Estimated Construction Emissions (Unmitigated)

Pollutant	Annual MT CO ₂ e/year	
	APCD Threshold	Estimated Operational and Amortized Construction Emissions ¹
Greenhouse Gases (CO ₂ , CH ₄ , N ₂ O, HFC, CFC, F ₆ S)	1,150 MT CO ₂ e	228.24 MT CO ₂ e

¹ Construction emissions are estimated based on information from the City as well as the defaults used by CalEEMod. These are conservative estimations and may not be accurate based on the final design and construction plans for the proposed project.

² Showing Maximum Daily Emission from construction year 2016, which represents the highest daily emission (worst case scenario) between 2016 and 2017.

Source: CalEEMod 2016.

The project would not exceed adopted GHG thresholds applied by the APCD and is not anticipated to generate significant GHG emissions due to the minimal traffic generated and limited energy use. The project would not conflict with the statewide regulations listed above. Therefore, impacts would be less than significant.

Considering construction and operation emissions associated with the Original Project were conservatively estimated and were still well below the APCD threshold for CO₂e, emissions associated with the construction of the new trench and operation of the new extension line would not result in an exceedance of this threshold. Additionally, the Proposed Project includes the implementation of all mitigation measures included in the 2015 IS/MND, including all the of mitigation discussed under Section 3.3 above, which are sufficient to mitigate any potential impacts associated with the Proposed Project; therefore, no new significant impacts associated with greenhouse gases would occur and no new mitigation measures are required.

3.8 HAZARDS AND HAZARDOUS MATERIALS

As discussed in the 2015 IS/MND, the Original Project was considered to have the potential to result in a significant impact associated with the routine transport, use, or disposal of hazardous materials and through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. The 2015 IS/MND included mitigation in the form of a Hazardous Material Control Plan and a Hazardous Materials Business Plan to avoid and minimize potential impacts related to hazards and hazardous materials.

Construction and operation activities associated with the new extension line would be consistent with those evaluated in the 2015 IS/MND because construction equipment required for the excavation of the new trench and installation of the new recycled water supply line would be the same equipment used for construction activities required for the Original Project. Additionally, operation of the Proposed Project would not require a new or increased transport, storage, use or disposal of hazardous materials compared to what was evaluated for the Original Project. The Proposed Project includes the implementation of all mitigation measures included in the 2015 IS/MND, which are sufficient to mitigate any potential impacts associated with the Proposed Project; therefore, no new significant impacts associated with hazards or hazardous materials would occur and no new mitigation measures are required.

3.9 HYDROLOGY AND WATER QUALITY

As discussed in the 2015 IS/MND, the Original Project is considered to have the potential to result in the following significant impacts:

- Violate water quality or wastewater discharge requirements associated with the discharge of wastewater into the Salinas River.
- Result in pollutant discharge into the waters of the Salinas River during construction and operation of the proposed facilities.

Mitigation measures were included in the 2015 IS/MND to minimize potential impacts associated with water quality standards, waste discharge requirements, pollutant discharge, and runoff in the form of a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the requirements of the State General Order related to construction projects. The SWPPP would be consistent with the best management practices found within the City's Storm Water Management Plan and shall identify the selected stormwater management procedures, pollution control technologies; spill response procedures, and other means that will be used to minimize erosion and sediment production and the release of pollutants to surface water during construction.

Construction of the Proposed Project would result in an additional 1,500 square feet (0.3 acre) of ground disturbance, resulting in a total disturbance area of 75,481 square feet (1.73 acres), which is not a substantial increase compared to the Original Project. Similar to the Original Project, the Proposed Project would potentially result in erosion and runoff resulting from excavation activities. The Proposed Project includes the implementation of all mitigation measures included in the 2015 IS/MND, which are sufficient to mitigate any potential impacts associated with the Proposed Project; therefore, no new significant impacts to hydrology or water quality would occur and no new mitigation measures are required.

3.10 LAND USE AND PLANNING

As discussed in the 2015 IS/MND, the Original Project was not expected to result in any potentially significant impacts associated with land use and planning and no mitigation was required.

The entire extension line would be developed within the existing WWTP property and would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project; therefore, no new significant impacts associated with land use would occur and no new mitigation measures are required.

3.11 MINERAL RESOURCES

As discussed in the 2015 IS/MND, the Original Project was not expected to result in any impacts associated with mineral resources and no mitigation was required.

The entire extension line would be developed within the existing WWTP property on land that is landscaped/developed on previously disturbed soils; therefore, no new significant impacts associated with mineral resources would occur and no new mitigation measures are required.

3.12 NOISE

As discussed in the 2015 IS/MND, the Original Project is considered to have the potential to result in the following significant impacts:

Expose sensitive receptors to increases in ambient noise levels and groundborne associated with construction activities and noise generated by the operation of the proposed facilities. Mitigation measures were included in the 2015 IS/MND to minimize potential impacts associated with excessive noise levels, groundborne vibration and noise levels, and increases in ambient noise levels in the form of a Noise Control Plan which would include Noise Reduction Best Management Practices for all phases of construction.

Similar to the Original Project, the Proposed Project would result in construction noise associated with excavation activities. These impacts would be consistent with construction noise impacts evaluated in the 2015 IS/MND because the Original Project would also require excavation and grading activities throughout the WWTP property at approximately the same distance from surrounding sensitive receptors (approximately 800 feet). The Proposed Project includes the implementation of all mitigation measures included in the 2015 IS/MND including the preparation of a Noise Control Plan which includes Noise Reduction Best Management Practices, which are sufficient to mitigate any potential impacts associated with the Proposed Project; therefore, no new significant impacts associated with noise would occur and no new mitigation measures are required.

3.13 POPULATION AND HOUSING

As discussed in the 2015 IS/MND, the Original Project was not expected to result in any potentially significant impacts associated with population and housing and no mitigation was required.

The Proposed Project would not induce population growth, displace existing housing, or displace people; therefore, no new significant impacts to population or housing would occur and no new mitigation measures are required.

3.14 PUBLIC SERVICES

As discussed in the 2015 IS/MND, the Original Project was not expected to result in any potentially significant impacts associated with public services and no mitigation was required. The Proposed Project would not require the provision of or need for new or physically altered governmental facilities; therefore, no new significant impacts to public services would occur and no new mitigation measures are required.

3.15 RECREATION

As discussed in the 2015 IS/MND, the Original Project was not expected to result in any Under the Proposed Project, the entire extension line would be developed within the existing WWTP property and would not result in an increased use of existing recreational facilities or include the construction or expansion of recreational facilities; therefore, no new significant impacts to recreation would occur and no new mitigation measures are required.

3.16 TRANSPORTATION AND TRAFFIC

As discussed in the 2015 IS/MND, the Original Project was not expected to result in any potentially significant impacts associated with traffic and transportation and no mitigation was required.

Construction of the new recycled water extension line would not result in a substantial increase in trips hauling materials to/from the site and operation of the new recycled water extension line would not generate new operational trips. Therefore, implementation of the Proposed Project would not result in new or increased impacts associated with transportation and traffic and no new mitigation measures are required.

3.17 UTILITIES AND SERVICE SYSTEMS

As discussed in the 2015 IS/MND, the Original Project was not expected to result in any potentially significant impacts associated with utilities and service systems and no mitigation was required.

The Proposed Project includes the facility upgrades to the WWTP described in the 2015 IS/MND for the Original Project in addition to the development of a new recycled water extension line to supply recycled water to Caltrans for irrigation purposes along the U.S. Highway 101 corridor. The Proposed Project would not generate new solid waste or require the development or provision of new utilities or service systems, aside from those associated with the WWTP upgrades. The Proposed Project would support the goals of the City's long-term water management plan by facilitating the use of recycled water for irrigation by Caltrans, other non-potable water uses, and groundwater basin recharge by reducing the demand for groundwater supply. Implementation of the Proposed Project would not result in new or increased impacts to utilities or service systems and no new mitigation measures are required.

3.18 MANDATORY FINDINGS OF SIGNIFICANCE

The Original Project was determined to not result in significant environmental effects, with mitigation measures implemented for various impact areas. The Proposed Project has been evaluated to determine if it would result in any new or more severe environmental effects than were previously disclosed. As demonstrated in the foregoing analyses, the Proposed Project would not result in any new or more severe environmental effects compared to those evaluated for the Original Project in the 2015 IS/MND. Mitigation measures that were incorporated in the 2015 IS/MND for the Original Project are still relevant and equally applicable to the revised Proposed Project to reduce potential impacts to a less than significant level.

SECTION 4 CONCLUSION

On the basis of the evaluation presented in Section 3, the changes within the Proposed Project (which would not trigger any of the conditions listed in Section 1.4 of the Addendum), would not require preparation of a subsequent or supplemental environmental impact report or negative declaration under State CEQA Guidelines Sections 15162 or 15163. Thus, this Addendum satisfies the requirements of State CEQA Guidelines Sections 15162 and 15164. The proposed project does not introduce new significant environmental effects, substantially increase the severity of previously identified significant environmental effects, and no new or different mitigation measures or alternatives exist.

Overall, the Proposed Project would result in similar effects to those of the Original Project with similar operations as those which were originally proposed; therefore, the Proposed Project would generate comparable effects. The Proposed Project would not result in new significant effects or effects that would be substantially more severe than those identified in the 2015 IS/MND. The mitigation measures included in the original IS/MND apply to the Proposed Project and would remain applicable.

The analyses and conclusions of the 2015 IS/MND remain current and valid and would not change with the implementation of the Proposed Project. The proposed revisions to the project, would not cause new or substantially more severe significant effects than those identified in the 2015 IS/MND, and no new information has become available that shows that the project would cause significant environmental effects not already analyzed in the 2015 IS/MND. Therefore, no further environmental review is required beyond this Addendum to the 2015 IS/MND.

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SECTION 5

REFERENCES

California Emissions Estimator Model (CalEEMod). 2016. Updated CalEEMod Output Data. Included as Attachment B. February 8, 2016.

SWCA Environmental Consultants. 2015. Initial Study/Mitigated Negative Declaration for the City of Paso Robles Tertiary Treatment Facilities Project. SCH No. 2015111032

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