# CITY OF FRESNO NORTHEAST SURFACE WATER TREATMENT FACILITY STORAGE TANK PROJECT

Final Addendum to the Supplemental Mitigated Negative Declaration State Clearinghouse Number 2017041061

Prepared for City of Fresno

July 2017



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# ERRATA FOR CITY OF FRESNO NORTHEAST SURFACE WATER TREATMENT FACILITY STORAGE TANK PROJECT FINAL ADDENDUM TO THE SUPPLEMENTAL MITIGATED NEGATIVE DECLARATION

#### Introduction

The City of Fresno (City) Northeast Surface Water Treatment Facility Storage Tank Project Supplemental Mitigated Negative Declaration (MND) (State Clearinghouse Number 2017041061) was developed to meet the water quality requirements, customer demands, and reduce the use of groundwater of the City through the installation of a new 6 million gallon (MG) storage tank at the Northeast Surface Water Treatment Facility (NESWTF) as part of the City's Metropolitan Water Resources Management Plan Update (Metro Plan Update). In July of 2017, the City certified the Supplemental MND and approved the Northeast Surface Water Treatment Facility Storage Tank Project. Since certification of the Supplemental MND and Project approval, refinements have been made to the proposed configuration of the facilities.

The California Environmental Quality Act (CEQA) Guidelines (sections 15162 and 15164) require that a lead agency prepare an addendum to a negative declaration if some changes or additions to the environmental evaluation of a project are necessary but none of the following occurs:

- 1. There are no substantial changes in the project which require major revisions to the negative declaration or a substantial increase in the severity of previously identified significant effects;
- 2. There are no substantial changes with respect to the circumstances under which the project is undertaken which require major revisions to the negative declaration; or
- 3. No new information of substantial importance, which could not have been known with the exercise of reasonable diligence at the time of negative declaration adoption, shows any of the following:
  - i. the project will have one or more significant effects not discussed in the negative declaration,
  - ii. the project will result in impacts substantially more severe than those disclosed in the negative declaration,
  - iii. 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 proponent declines to adopt it, or
  - iv. mitigation measures or alternatives that are considerably different from those analyzed in the negative declaration would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt it.

The purpose of this document is to (1) evaluate the proposed refinements to the configuration of the facilities, (2) provide documentation to support that the proposed refinements would not result in effects that meet the criteria described in CEQA Guidelines Sections 15162 and 15164 thereby substantiating that the preparation of an Addendum is appropriate under CEQA.

Under CEQA, modifications that are not substantial, but represent minor changes or additions may be presented in an addendum. On the basis of the evaluation presented in Section 3, the proposed refinements to the facility configuration would not trigger any of the conditions described in CEQA Guidelines sections 15162 and 15164, requiring preparation of a subsequent or supplemental MND. Under CEQA, an addendum does not require circulation. However, the Draft Supplemental MND Addendum was circulated for 15 days from July 7, 2017 to July 22, 2017 as a requirement of the Drinking Water State Revolving Fund (SRF) Policy. The City of Fresno is seeking funding from the Drinking Water SRF program for this Project. This Final Addendum to the Supplemental MND has been prepared pursuant to CEQA Guidelines<sup>1</sup>, which outline all aspects of the preparation of the Draft Addendum to the Supplemental MND and its review, as well as the subsequent steps to preparing a Notice of Determination (NOD). The public review period closed with no comments received. No revisions were made.

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Title 14, California Code of Regulations, Chapter 3, Sections 15000 – 15387 and Appendices, accessible at http://ceres.ca.gov/topic/env\_law/ceqa/guidelines/

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#### **SECTION 1**

## Background and Purpose of the Addendum

#### 1.1 Background

The City of Fresno (City) Northeast Surface Water Treatment Facility Storage Tank Project (proposed Project) was developed to meet the water quality requirements, customer demands, and reduce the use of groundwater of the City through the installation of a new 6 million gallon (MG) storage tank at the Northeast Surface Water Treatment Facility (NESWTF) as part of the City's Metropolitan Water Resources Management Plan Update (Metro Plan Update).

The City adopted the Metro Plan Update EIR in June 2014. The purpose of the Metro Plan Update was to update the 1996 Fresno Metropolitan Water Resources Management Plan (1996 Metro Plan) taking into consideration available new data and accommodating physical and institutional changes which have occurred since the 1996 Metro Plan was prepared. The completed Metro Plan Update facilitates future water resource decisions and utility planning, and assists in the pursuit of potential funding opportunities. Implementation of the City's recommended water supply plan will result in a more optimized and efficient conjunctive use of the City's available water resources, which will enhance the City's overall water supply reliability. The proposed Metro Plan Update includes near-term and future project elements including surface water treatment facilities, regional transmission facilities, groundwater facilities, potable water storage facilities, recycled water facilities, and water conservation measures. An Addendum to refine the original noise mitigation measure, in support of a permit application to the City to conduct construction outside of hours specified in the municipal code was adopted in August 2016.

In July of 2017, the City certified a Supplemental Mitigated Negative Declaration (MND) (State Clearinghouse Number 2017041061) for the proposed Project and approved the proposed Project. The Supplemental MND is on file at the City's Water Division, and can be requested from the City of Fresno, Recharge Fresno Program, 2101 G Street, Building A, Fresno, California 93706-1602. Since certification of the Supplemental MND and Project approval, refinements have been made to the proposed configuration of the facilities, as described in Section 2.

#### 1.2 Purpose of this Addendum

The California Environmental Quality Act (CEQA) Guidelines (sections 15162 and 15164) require that a lead agency prepare an Addendum to a negative declaration if some changes or additions to the environmental evaluation of a project are necessary but none of the following occurs:

- 4. There are no substantial changes in the project which require major revisions to the negative declaration or a substantial increase in the severity of previously identified significant effects;
- 5. There are no substantial changes with respect to the circumstances under which the project is undertaken which require major revisions to the negative declaration; or
- 6. No new information of substantial importance, which could not have been known with the exercise of reasonable diligence at the time of negative declaration adoption, shows any of the following:
  - v. the project will have one or more significant effects not discussed in the negative declaration,
  - vi. the project will result in impacts substantially more severe than those disclosed in the negative declaration,
  - vii. 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 proponent declines to adopt it, or
  - viii. mitigation measures or alternatives that are considerably different from those analyzed in the negative declaration would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt it.

The purpose of this document is to (1) evaluate the proposed refinements to the configuration of the facilities, (2) provide documentation to support that the proposed refinements would not result in effects that meet the criteria described in CEQA Guidelines Sections 15162 and 15164 thereby substantiating that the preparation of an Addendum is appropriate under CEQA.

#### **SECTION 2**

## **Description of Project Changes**

#### 2.1 Project Overview

The City proposed to install a new 6 MG water storage tank to provide a total of 7.5 MG of storage capacity at the NESWTF. The proposed Project would allow the City to meet the water quality requirements, customer demands, and reduce the use of groundwater as proposed as part of the City's Metro Plan Update.

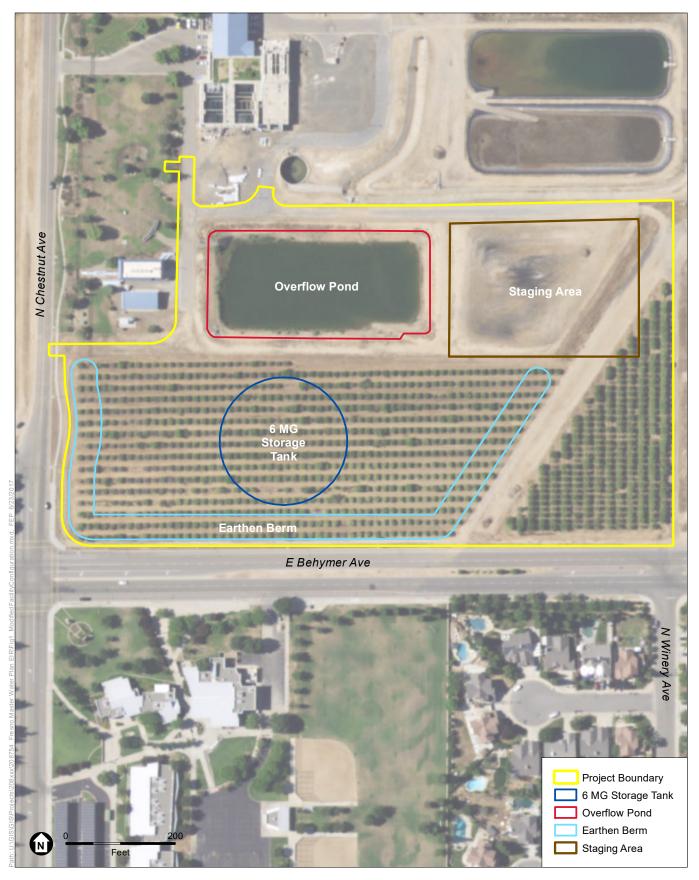
#### 2.2 Proposed Project Changes

#### 2.2.1 Project Facilities

The City is proposing to refine the configuration of the previously approved facilities, which included changes to the existing overflow basin from an east-west alignment to a north-south alignment. The 6 MG water storage tank was proposed immediately to the east of the overflow basin. The current configuration would keep the existing overflow basin where it is currently located, but would move the location of the storage tank and associated infrastructure immediately south of the overflow basin, with a 10-foot high earthen berm to be constructed along the perimeter of the grove surrounding the tank. The storage tank would remain 6 MG in size but would extend farther into the existing grove than in the previously approved configuration. The current configuration may change slightly within the existing study area, and will result in the removal of the existing grove. Project refinements are illustrated in **Figure 1**.

#### 2.2.3 Project Operation

The refined facility configuration would not alter NESWTF operations. Therefore, Project operation would not change in comparison to that discussed in the Supplemental MND.



SOURCE: ESRI, 2014; City of Fresno, 2017; ESA, 2017

City of Fresno Northeast Surface Water Treatment Facility Storage Tank Project

#### **SECTION 3**

### Analysis of Potential Environmental Effects

Because Project operations would remain unchanged, the focus of the analysis in this Addendum is on the proposed installation of the 6MG water storage tank with the refined configuration. Therefore, impacts related to Project operations are not discussed further in this Addendum.

#### 3.1 Aesthetics

Section 2.1 of the Supplemental MND analyzed impacts to the aesthetics of the Project area, and found there would be no impact to scenic vistas or scenic resources because no designated scenic vistas or scenic resources are near the Project site. The Supplemental MND found there would be less than significant impacts to the existing visual character and from new sources of light and glare. Installation of the facilities would require the use of heavy equipment, excavation and grading, and storage of materials on-site, which could result in temporary changes to the visual character of the surrounding areas. However, views of the facility from public roads are partially screened due to safety fencing and surrounding landscaping and the new water storage tank, reconfiguration of the overflow basin, and associated improvements of the NESWTF would be consistent with the existing visual character of the NESWTF.

Like the approved Project, the proposed revisions to the facility configuration would not have a significant impact on the visual environment because facilities would be consistent with the existing visual character of the NESWTF. The revised facility configuration would not require additional nighttime lighting. The revised facility configuration would still be located within the existing NESWTF and would not be located in or near any designated scenic vistas or scenic resources. Therefore, the changes to the proposed Project would not substantially alter the character or quality of the Project site or its surroundings, nor would they substantially affect the amount of light and glare generated. There are no changes in the environmental setting or Project characteristics that would raise visual or aesthetic issues that were not previously addressed in the Supplemental MND. Therefore, changes to the proposed Project would not alter the conclusions of the Supplemental MND, result in any new significant impacts including cumulative or need for additional mitigation measures, or substantially increase the severity of the previously identified aesthetics impacts.

#### 3.2 Agricultural and Forestry Resources

Section 2.2 of the Supplemental MND analyzed impacts to agricultural and forestry resources, and concluded that installation of the proposed facilities would not result in a significant

conversion of farmland or forest resources, because the loss of 2 acres of Farmland of Statewide Importance would represent a decrease of 0.000486 percent. In addition, the grove where trees would be removed is within the existing NESWTF site boundary and is currently unmaintained. The Supplemental MND determined that the proposed Project not conflict with existing zoning or convert farmland or forestland to a non-agricultural or non-forest use.

Like the approved Project, the proposed refinements to the facility configuration would occur within the existing NESWTF site boundary. The new configuration would result in the removal of the entire existing grove for a total of approximately 8.5 acres. The loss 8.5 acres of Farmland of Statewide Importance would represent a decrease of 0.00206 percent within the County. This does not represent a substantially more severe cumulative impact than the 0.000486 percent that was previously discussed in the Supplemental MND. As with the original configuration, the new configuration would still be located entirely within the existing NESWTF boundary. As a result, there are no changes in the environmental setting or Project characteristics that would raise agricultural issues that were not previously addressed in the Supplemental MND. Therefore, proposed Project changes would not alter the conclusions of the Supplemental MND, result in any new significant impacts including cumulative or need for additional mitigation measures, or substantially increase the severity of the previously identified land use and agricultural impacts.

#### 3.3 Air Quality

Section 2.3 of the Supplemental MND analyzed air quality impacts and concluded that installation of the proposed facilities could result in significant impacts due to construction activities generating short-term emissions of criteria air pollutants. Implementation of Metro Plan Update EIR Mitigation Measures 4.7.1a to 4.7.1c would minimize potential construction related air emissions to a less than significant level.

Proposed construction equipment and activities for the Project with refinements to the facility configuration would be similar to those identified in the Supplemental MND. In addition, construction of the Project with refinements to the facility configuration would be required to comply Metro Plan Update EIR Mitigation Measures 4.7.1a to 4.7.1c, which would be adequate to mitigate significant criteria air emissions. As a result, there are no changes in the environmental setting or Project characteristics that would raise air quality issues that were not previously addressed in the Supplemental MND. Therefore, changes to the proposed Project would not alter the conclusions of the Supplemental MND, result in any new significant impacts including cumulative or need for additional mitigation measures, or substantially increase the severity of the previously identified air quality impacts.

#### 3.4 Biological Resources

Section 2.4 of the Supplemental MND analyzes impacts to biological resources and concludes that the installation of the NESWTF storage tank could result in significant impacts to special-status species, their habitats, and seasonal movement for migratory wildlife species. All of these

impacts would be reduced to less than significant with implementation of Metro Plan Update EIR Mitigation Measures 4.5.1a, 4.5.1b, 4.5.1c, 4.5.3, 4.5.4a, 4.5.4b, and 4.5.5.

The proposed refinements to the facility configuration would result in additional acres of orchard land to be impacted by the Project. The orchard, which was identified as potential habitat for special status species, was previously analyzed under the Supplemental MND during the analysis of the project's potential for impacting biological resources during construction. Construction of the proposed modified storage tank design would be required to comply with Metro Plan Update EIR Mitigation Measures 4.5.1a, 4.5.1b, 4.5.1c, 4.5.3, 4.5.4a, 4.5.4b, and 4.5.5 to reduce the potential impacts to less than significant. Because anticipated potential impact levels would be similar to the Project as analyzed in the Supplemental MND, these mitigation measures would be adequate to mitigate potential impacts to biological resources. Thus there are no changes in the environmental setting or Project characteristics that would raise important new potential impacts to special status species and their habitats. Therefore, proposed Project changes would not alter the conclusions of the Supplemental MND, result in any new significant impacts, or substantially increase the severity of the previously identified biological resources impacts.

#### 3.5 Cultural Resources

Section 2.5 of the Supplemental MND noted that potentially significant impacts to cultural resources during the construction phase would be limited to unidentified prehistoric or historic subsurface cultural resources. The proposed refinements to the facility configuration are located within the 0.25 mile buffer area considered in the records search performed for the Supplemental MND. As determined by the archival review conducted at the San Joaquin Valley Information Center (File No. RS# 10-291), no cultural resources have been previously recorded within or adjacent to the Project area. Two cultural resource surveys have been previously conducted within 0.25 mile of the Project area (FR1692 and FR1607), along with an intensive field survey of the entire NESWTF conducted by Environmental Science Associates (ESA) in 2011. The NESWTF is surrounded by modern development, with no historic period built resources within or adjacent to the site.

Construction of the proposed Project with refinements to the facility configuration would be similar to the approved Project except that construction of the storage tank would occur immediately south of the overflow basin instead of east. Therefore, the area of potential effect (APE) was changed to encompass the entire grove. Follow up contact was made to the Native American representatives from the previously contacted list of Native American individuals/organizations provided by the Native American Heritage Commission from the Supplemental MND to notify them of the refinements. On May 25, 2017, an ESA cultural resources specialist conducted a pedestrian field survey of the APE. The survey covered the groves at the eastern corner of East Behymer Avenue and North Chestnut Avenue, just south of the NESWTF. The entire APE appears to have been disturbed from historic-period agricultural and/or modern development activities. No cultural material was identified during the cultural

survey. ESA cultural resources specialists determined that construction of the proposed Project with refinements to the facility configuration would not result in direct or indirect impacts because no known resources would be impacted. Construction of the proposed Project with refinements to the facility configuration would result in no anticipated impacts to historical resources. No additional cultural resources were identified within the refined facility configuration during the course of archival review or field survey.

Metro Plan Update EIR Mitigation Measures 4.12.2b and 4.12.2c include implementation of a construction worker training program and measures to protect the unexpected discovery of subsurface resources during construction. Metro Plan Update EIR Mitigation Measures 4.12.4a and 4.12.4b provide for review of discovered paleontological resources by a qualified paleontologist, and implementation of a resource monitoring and mitigation program, as relevant. Metro Plan Update EIR Mitigation Measure 4.12-3 would require contact with the County coroner and the Native American Heritage Commission as warranted. Implementation of these mitigation measures would reduce impacts to previously unidentified archeological resources to a less than significant level. Construction of the proposed Project with refinements to the facility configuration is not anticipated to encounter subsurface resources, paleontological resources or human remains, but would be required to comply with Metro Plan Update EIR Mitigation Measures 4.12.2b and 4.12.2c, Metro Plan Update Mitigation Measures 4.12.4a and 4.12.4b; and Metro Plan Update EIR Mitigation Measure 4.12.3. In the unlikely event that resources are discovered during construction, implementation of these mitigation measures would ensure that proper procedures are followed should the unexpected discovery of subsurface resources, paleontological resources, or human remains occur. As a result, there are no changes in the environmental setting or Project characteristics that would raise cultural resources issues or increase the intensity of an impact that was not previously addressed in the Supplemental MND. Therefore, proposed Project revisions would not alter the conclusions of the Supplemental MND, result in any new significant impacts including cumulative or need for additional mitigation measures, or substantially increase the severity of the previously identified cultural resources impacts.

#### 3.6 Geology, Soils, and Seismicity

Section 2.6 of the Supplemental MND analyzed potential impacts to geology and soils and concluded that Project facilities could be subject to damage resulting from a seismic event or expansive soil conditions. Implementation of Metro Plan Update EIR Mitigation Measures 4.3.1a-c would reduce the impacts to a less than significant level by providing for the preparation of a soil and geotechnical engineering study for the proposed Project, conformance to California Building Code (CBC) standards for seismicity, engineered slope stability, and erosion control, as relevant and would also ensure adherence to pipeline design guidelines provided by the American Water Works Association.

Construction of the proposed Project with refinements to the facility configuration would be similar to the approved Project except that potential geology, soils, and seismicity impacts would occur in slightly different locations with the refined configuration. Potential impacts include Project facilities being subject to damage resulting from a seismic event or expansive soil conditions. Like the approved Project, the proposed Project with refinements to the facility configuration would result in the installation of facilities that would be required to comply with Metro Plan Update EIR Mitigation Measures 4.3.1a-c, which would be adequate to mitigate potential significant geology and soils impacts. As a result, the conclusions and proposed mitigation measures of the existing geology, seismicity, and soils analysis within the Supplemental MND remain unchanged and are applicable to the proposed changes described in this Addendum. There are no changes in the environmental setting or Project characteristics that would raise geology, seismicity, and soils issues that were not previously addressed in the Supplemental MND. Therefore, proposed Project changes would not alter the conclusions of the Supplemental MND, result in any new significant impacts including cumulative or need for additional mitigation measures, or substantially increase the severity of the previously identified geology, soils, and seismicity impacts.

#### 3.7 Greenhouse Gas Emissions

Section 2.7 of the Supplemental MND analyzed greenhouse gas emissions and climate change impacts and concluded that there would be less than significant impacts due to greenhouse gas emissions and climate change. Construction equipment and activities of the proposed Project with refinements to the facility configuration would be similar to the approved Project except that construction of the storage tank would occur immediately south of the overflow basin instead of east. Greenhouse gas emissions of the Project are not near any significance thresholds; therefore, the revised Project would not result in a significant impact or require additional mitigation. As a result, there are no changes in the environmental setting or Project characteristics that would raise air quality issues that were not previously addressed in the Supplemental MND. Therefore, changes to the proposed Project would not alter the conclusions of the Supplemental MND, result in any new significant impacts including cumulative, or substantially increase the severity of the previously identified air quality impacts.

#### 3.8 Hazards and Hazardous Materials

Section 2.8 of the Supplemental MND analyzed impacts related to hazards and hazardous materials, and concluded that the installation of proposed facilities would not result in a significant impact from hazards and hazardous materials. Numerous laws and regulations govern the transport, use, storage, handling and disposal of hazardous materials to avoid hazardous waste releases. Lands within the modified facility configuration do not have a history of hazardous material use and no hazardous materials sites were discovered in the Project area during a search of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The proposed Project and staging area located entirely within the NESWTF and would not interfere

with traffic. The risk of wildfire within the NESWTF is considered low due to the developed nature of the property. In addition, no airports are located within the vicinity of the proposed Project. Construction of the proposed Project with refinements to the facility configuration would be required to comply with all applicable laws and regulations that govern the transport, use, storage, handling and disposal of hazardous materials. As a result, there are no changes in the environmental setting or Project characteristics that would raise hazards and hazardous materials issues that were not previously addressed in the Supplemental MND. Therefore, changes to the proposed Project would not alter the conclusions of the Supplemental MND, result in any new significant impacts including cumulative or need for additional mitigation measures, or substantially increase the severity of the previously identified hazards and hazardous materials impacts.

#### 3.9 Hydrology and Water Quality

Section 2.9 of the Supplemental MND analyzed impacts to hydrology and water quality and concluded that installation of the project facilities would not result in significant impacts to water quality. Adherence to Best Management Practices (BMPs) as part of obtaining a National Pollutant Discharge Elimination System (NPDES) General Construction Permit would ensure impacts from waterborne pollutants entering natural waters would be less than significant. The proposed Project with refinements to the facility configuration would be constructed in a similar manner as previously analyzed but construction of the storage tank would occur immediately south of the overflow basin instead of east. As such, impacts to hydrology and water quality from the disturbance of soils and sedimentation, hazardous substances, groundwater, drainage, erosion, and flooding would be similar to the Project as analyzed in the Supplemental MND. Similar to the Project analyzed in the Supplemental MND, the modified facility configuration would also be required to comply with the conditions of the NPDES General Construction Permit during construction, including applicable BMPs, which would ensure that potential water quality impacts would be minimized. As a result, there are no changes in the environmental setting or Project characteristics that would raise groundwater hydrology and quality issues that were not previously addressed in the Supplemental MND. Therefore, proposed Project changes would not alter the conclusions of the Supplemental MND, result in any new significant impacts including cumulative or need for additional mitigation measures, or substantially increase the severity of the previously identified groundwater hydrology and quality impacts.

#### 3.10 Land Use and Planning

Section 2.10 of the Supplemental MND analyzed impacts to land use planning and concluded that installation of the Project facilities would have no impact on land use because the facilities would be installed within the existing NESWTF and would be consistent with existing land use designations. The proposed refinements to the facility configuration would also occur within the existing NESWTF. Construction activities associated with the proposed refinements to the facility configuration would be similar to those described for facilities under the Supplemental MND. As

a result, there are no changes in the environmental setting or Project characteristics that would raise land use issues that were not previously addressed in the Supplemental MND. Therefore, proposed Project changes would not alter the conclusions of the Supplemental MND, result in any new significant impacts including cumulative or need for additional mitigation measures, or substantially increase the severity of the previously identified land use impacts.

#### 3.11 Mineral Resources

Section 2.11 of the Supplemental MND analyzed impacts to mineral resources and concluded that no impact to mineral resources would occur. Installation of the proposed refinements to the facility configuration would also occur within the existing NESWTF and would not be located over any mineral resource area, preventing future resource excavation. As a result, there are no changes in the environmental setting or Project characteristics that would raise mineral resource issues that were not previously addressed in the Supplemental MND. Therefore, proposed Project changes would not alter the conclusions of the Supplemental MND, result in any new significant impacts including cumulative or need for additional mitigation measures, or substantially increase the severity of the previously identified mineral resource impacts.

#### **3.12 Noise**

Section 2.12 of the Supplemental MND concluded that there would be significant temporary increases in noise levels associated with installation of the Project facilities. However, Implementation of Metro Plan Update EIR Mitigation Measures 4.8.1 imposes measures to reduce noise levels when activities occur adjacent to sensitive receptors. Impacts related to vibration or groundborne noise levels were determined to be less than significant or no impact in the Supplemental MND.

The proposed Project with refinements to the facility configuration would result in similar construction noise impacts as the approved Project and would and require the implementation of Metro Plan Update EIR Mitigation Measure 4.8.1 to reduce temporary significant construction noise impacts and vibration to less than significant. Therefore, proposed Project changes would not alter the conclusions of the Supplemental MND, result in any new significant impacts including cumulative or need for additional mitigation measures, or substantially increase the severity of the previously identified noise impact conclusions.

#### 3.13 Population and Housing

Section 2.13 of the Supplemental MND analyzed impacts to population and housing and concluded that there would be less than significant impacts to growth and no impact to displacement of housing or people. The facilities constructed under the proposed Project would be used to provide a treated water supply to the City of Fresno through 2025. Construction of the proposed Project with refinements to the facility configuration would not change the amount of treated water distributed or result in displacement of existing homes or substantial numbers of

people. As a result, there are no changes in the environmental setting or Project characteristics that would raise population and housing issues that were not previously addressed in the Supplemental MND. Therefore, proposed Project changes would not alter the conclusions of the Supplemental MND, result in any new significant impacts including cumulative or need for additional mitigation measures, or substantially increase the severity of the previously identified population and housing impacts.

#### 3.14 Public Services

Section 2.14 of the Supplemental MND analyzed impacts to public services and concluded that there would be no generation of new population growth, increase of staff to operate and maintain facilities or increase the demand for public services. Construction of the proposed Project with refinements to the facility configuration would distribute the same amount of treated water and therefore would not generate new population growth above existing assumed levels. The operation and maintenance of the modified facility configuration would not require the City to hire additional staff to operate and maintain facilities because the facilities would be constructed in the same manner as previously analyzed but in a slightly different configuration. Thus, construction of the proposed Project with refinements to the facility configuration would not increase the demand for the kinds of public services that would support new residents, such as schools, parks, fire, police, or other public facilities. Therefore, changes to the proposed Project would not alter the conclusions of the Supplemental MND, result in any new significant impacts including cumulative or need for additional mitigation measures, or substantially increase the severity of the previously identified public services and utilities impacts.

#### 3.15 Recreation

Section 2.15 of the Supplemental MND analyzed impacts to recreation and concluded that there would be no deterioration of recreational facilities and no expansion of existing facilities, or demand for expanded or new recreational facilities as a result of proposed Project implementation. Therefore, the Supplemental MND concluded that the proposed Project would not result in a significant recreation impact.

Like the approved Project, the proposed refinements to the facility configuration are not located near any recreational facilities. As a result, there are no changes in the environmental setting or Project characteristics that would raise recreation issues that were not previously addressed in the Supplemental MND. Therefore, proposed Project revisions would not alter the conclusions of the Supplemental MND, result in any new significant impacts including cumulative or need for additional mitigation measures, or substantially increase the severity of the previously identified recreation impacts.

#### 3.16 Transportation and Traffic

Section 2.16 of the Supplemental MND analyzed impacts to transportation and concluded that installation of the facilities would result in significant impacts due to potential traffic safety hazards. Implementation of Metro Plan Update EIR Mitigation Measure 4.6.1b would reduce this impact to less than significant by requiring development and implementation of a traffic management plan, obtaining necessary road encroachment permits, and coordination with local governments, agencies, and departments. Impacts from construction-generated traffic, lessening of roadway capacities, and interference with emergency access routes were found to be less than significant in the Supplemental MND. No impact on air traffic patterns or traffic levels would result from the proposed Project.

Like the approved Project, the proposed refinements to the facility configuration would require temporary increases in vehicle trips by construction workers and construction vehicles on area roadways that could result in short-term and intermittent lessening of roadway capacities; however, these impacts would be temporary and not result in any long-term degradation in operating conditions or level of service (LOS) on any local roadways. The proposed refinements to the facility configuration would not include any aircraft or structures that would intrude flight paths or air traffic spaces, nor would it include the development of alternative forms of transportation. Because the proposed refinements to the facility configuration would still be located within the NESWTF, it would not block or interfere with any emergency access route. Traffic safety hazards could result from the increase in safety hazards during construction from trucks carrying construction equipment and materials sharing the roadways. Construction of the proposed Project with refinements to the facility configuration would be required to comply with Metro Plan Update EIR Mitigation Measure 4.6.1b which would be adequate to mitigate potential traffic safety hazards. As a result, there are no changes in the environmental setting or Project characteristics that would raise transportation and traffic issues that were not previously addressed in the Supplemental MND. Therefore, changes to the proposed Project would not alter the conclusions of the Supplemental MND, result in any new significant impacts including cumulative or need for additional mitigation measures, or substantially increase the severity of the previously identified traffic and transportation impacts.

#### 3.17 Utilities and Service Systems

Section 2.17 of the Supplemental MND analyzed impacts related to wastewater treatment requirements, wastewater treatment capacity, adequate landfill capacity during construction and operation, and compliance with solid waste disposal regulations. These impacts were found to be less than significant. Impacts from the proposed Project related to the construction of new or expansion of existing public utilities and adequate water supplies were found to have no impact.

The proposed refinements to the facility configuration would result in the installation of Project facilities, although construction of the storage tank would occur immediately south of the overflow basin instead of east of the basin as proposed with the approved Project. Refinements to

the facility configuration would not result in changes to the amount of treated water available or require new or expanded water supply sources, as analyzed in the Supplemental MND, and therefore would not change the amount of wastewater generated. The proposed refinements to the facility configuration would also not require new or expanded stormwater drainage facilities and would result in similar levels of solid waste generation during construction and operation as analyzed in the Supplemental MND. Therefore, changes to the proposed Project would not alter the conclusions of the Supplemental MND, result in any new significant impacts including cumulative or need for additional mitigation measures, or substantially increase the severity of the previously identified utilities impacts.

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#### **SECTION 4**

#### Conclusion

On the basis of the evaluation presented in Section 3, the proposed refinements to the facility configuration would not trigger any of the conditions listed in Section 1.2 of this Addendum, requiring preparation of a subsequent or supplemental MND. This Addendum satisfies the requirements of CEQA Guidelines Sections 15162 and 15164. Under CEQA, refinements that are not substantial, but represent minor changes or additions may be presented in an Addendum. Under CEQA, an Addendum does not require circulation. However, this document will be circulated as a requirement of the Drinking Water State Revolving Fund (SRF) Policy because the City of Fresno is seeking funding from the Drinking Water SRF program for this Project. This document will also be made part of the administrative record and will be transmitted to the lead agency decision-making body along with the certified Supplemental MND to provide clarification regarding the proposed refinements described in this Addendum and to comply with CEQA Guidelines Section 15164.

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