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memorandum

date August 25, 2017

to Michael Carbajal
Water Division Manager
City of Fresno, Department of Public Utilities, Water Division
2101 G Street, Building A
Fresno, CA 93706

cc Patricia Diep

from Todd Gordon
Environmental Science Associates
2600 Capitol Avenue
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Sacramento, CA 95816

subject Comments Received on the Recycled Water Distribution System, Southwest Quadrant
Addendum to the Tiered Mitigated Negative Declaration

Mr. Carbajal,

An Addendum to the Tiered Mitigated Negative Declaration (MND) for the Recycled Water Distribution System, Southwest Quadrant Project was prepared to address minor changes to the Project. This Addendum satisfies the requirements of CEQA Guidelines Sections 15162 and 15164.

Under CEQA, an addendum does not require circulation. However, this document was circulated as a requirement of the Clean Water State Revolving Fund (SRF) Policy. The City of Fresno is seeking funding from the Clean Water SRF program for this Project. The document was circulated for public review for 15 days, from August 9, 2017 to August 24, 2017. One (1) comment letter was received during the public review period. The comment letter was from the State Water Board.

The State Water Board letter had two comments:

1. Please note that the CEQA document title and the Project's application titles do not match. Please correct this inconsistency. This can be done by requesting the SCH to update their records, or by requesting the CWSRF Project Manager to change the name in the Financial Assistance Application Submittal Tool (FAAST).
2. Table 1 on page 3-3 shows that the revised Project will have increased emissions for SO_x, PM₁₀, and PM_{2.5}. What has caused these increases?

The responses to these comments are as follows:

1. The City submitted a memo the State Clearinghouse on August 24, 2017 requesting they update their records and list the project title as “Recycled Water Distribution System, Southwest Quadrant”. The State Clearinghouse responded on August 24, 2017 stating that the change had been made. The communications are attached. The Project title change has been made in the Addendum.
2. Table 1 on page 3-3 of the Addendum shows emissions estimates for the Tiered MND and updated emissions estimates based on the changes included in the Addendum.

The emission estimates for SO_x shows emissions increasing from N/A (Construction emissions of SO_x were not estimated in Section 2.3 of the Tiered MND) in Section 2.3 of the Tiered MND to 5.5 tons per year (tpy) in 2017 and 6.3 tpy in 2018. The San Joaquin Valley Air Pollution Control District (SJVAPCD) significance threshold for SO_x is 100 tpy.

The emissions estimates for PM_{10} shows emissions increasing from 1.0 tpy in Section 2.3 of the Tiered MND to 1.1 tpy in 2017 and 1.1 tpy in 2018. The SJVAPCD significance threshold for PM_{10} is 15 tpy.

The emissions estimates for $\text{PM}_{2.5}$ increased from 0.7 tpy in Section 2.3 of the Tiered MND to 0.8 tpy in 2017 and 0.8 tpy in 2018. The SJVAPCD significance threshold for $\text{PM}_{2.5}$ is 15 tpy.

The increases in emission estimates may have occurred due to changes in phasing which may have grouped construction phases in a way that showed increases in these particular years of the project buildout. Another reason for the increases could be increased vehicle trips based on changes to the construction estimates. Regardless, the updated air quality emissions based on the changes discussed in the Addendum are well below the significance thresholds for all three emissions categories. Therefore, the project changes would not result in impacts substantially more severe than those disclosed in the MND. Edits for clarification have been added to the Addendum.

This document and the comment letter will be made part of the administrative record and will be transmitted to the lead agency decision-making body along with the certified Tiered MND, and Addendum to the Tiered MND to provide clarification regarding proposed refinements outlined above and to comply with CEQA Guidelines Section 15164.

Thank you,



Todd Gordon
Project Manager

Enclosures (2):

1. Final Addendum to the Tiered MND
2. Comment Letter from the State Water Board