

CITY OF JACKSON WASTEWATER TREATMENT PLANT IMPROVEMENT PROJECT

ADDENDUM #2 TO THE FINAL EIR

SCH# 2011062026

Prepared for:

CITY OF JACKSON
33 BROADWAY
JACKSON, CA 95642

Prepared by:

Michael Baker
INTERNATIONAL

2729 PROSPECT PARK DRIVE, SUITE 220
RANCHO CORDOVA, CA 95670

AUGUST 2016

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This document has been prepared in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15164 to serve as Addendum #2 to the previously certified City of Jackson Wastewater Treatment Plant Improvement Project Environmental Impact Report (EIR) – State Clearinghouse No. 2011062026 (City of Jackson 2013). The City of Jackson (City) is the lead agency for environmental review of the Wastewater Treatment Plant Improvement Project.

The environmental analysis provided in Section 3.0 of this Addendum #2 provides substantial evidence to support that none of the circumstances set forth in CEQA Guidelines Section 15162 would result from adoption and implementation of the proposed project. CEQA Guidelines Section 15162 and the Addendum's consistency with these guidelines are addressed below.

Information and technical analyses from the City of Jackson Wastewater Treatment Plant Improvement Project EIR (consisting of the Draft EIR and the Final EIR) and the 2014 Addendum are utilized throughout this Addendum #2. These documents are available for review at:

City of Jackson
33 Broadway
Jackson, CA 95642
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1.1 BACKGROUND AND PURPOSE OF THE EIR ADDENDUM #2

On March 11, 2013, the Jackson City Council certified the City of Jackson Wastewater Treatment Plant Improvement Project Final Environmental Impact Report (2013 EIR) (consisting of the Draft EIR, comments and responses to comments on the Draft EIR, and minor edits to the Draft EIR), pursuant to CEQA, and approved the preferred design of the Wastewater Treatment Plant Improvement Project (previous project). The previous project consisted of two major components: (1) improvements to the City's existing wastewater treatment plant (WWTP) facilities to upgrade the system's level of treatment; and (2) development of a new effluent disposal process that consists of a combination of improvements to effluent discharges to Jackson Creek and a reclamation/land disposal system (land disposal system) when effluent cannot be discharged to Jackson Creek under the new Waste Discharge Requirements in Order No. R5-2007-0133 (2007 Order) for the City's WWTP effluent discharge.

The 2007 Order requirements defined the project need in the ensuing years, including the project description provided in the City's Final EIR. However, subsequent to certification of the Final EIR, the City received new Waste Discharge Requirements adopted by the Central Valley Regional Water Quality Control Board in December 2013 in Order No. R5-2013-0146 (2013 Order). The 2013 Order modified the requirement for calculating the 5 percent effluent limit in Lake Amador to consider a harmonic annual mean, as opposed to the monthly average in the 2007 Order. This modification eliminates the necessity for the City to remove effluent from the creek to comply with this requirement and therefore changes the proposed project as presented in the Final EIR.

Given that the City has an existing and operational WWTP, and in light of the modified requirements of the 2013 Order, the City determined that use of the existing facilities would be optimized to save costs and maximize the value of this existing utility to the ratepayers inherent in its remaining useful life.

The City subsequently revised the plant design and operations to make the most use of the existing facilities by continuing to use all of them (with the exception of the chlorine disinfection facilities), with the addition of new treatment components. The chlorine disinfection facilities

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were to be replaced with UV disinfection as part of the strategy to comply with the 2013 Order, and the City would continue to discharge effluent to Jackson Creek, year-round (instead of the land disposal of treated effluent). With this revised project, the City would undertake considerable improvements to the wastewater treatment process and conduct special studies to mitigate some of the water quality impacts resulting from continued discharge to the creek and to provide greater confidence in the ability of the WWTP to reliably comply with discharge prohibitions and effluent limitations in the 2013 Order. It also avoids allowing Jackson Creek downstream of the WWTP to become an ephemeral stream and the impacts that would have occurred under the previous project. This was referred to as the "revised project."

The potential environmental effects of the changes summarized above for the revised project were evaluated in an Addendum to the Final EIR (City of Jackson 2014). The City adopted the Addendum and approved the revised project on July 14, 2014 (Resolution No. 2014-28).

1.2 BASIS FOR DECISION TO PREPARE ADDENDUM

Changes to the WWTP needed to achieve project objectives to the extent reasonable via the revised project were presented in Table 2.0-2 in the 2014 Addendum (page 2.0-9). Some of the changes identified in Table 2.0-2 have been implemented, while others were determined to be unnecessary. However, a few minor changes to plant design and operations have been identified since the 2014 Addendum was adopted and the revised project was approved, which comprise the focus of this Addendum #2.

In determining whether an Addendum is the appropriate document to analyze modifications to the Wastewater Treatment Plant Improvement Project, State CEQA Guidelines Section 15164 (Addendum to an EIR or Negative Declaration) states [subsection b has intentionally been omitted, as it is not relevant to this discussion]:

- (a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*
- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.*
- (d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.*
- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.*

Because the Wastewater Treatment Plant Improvement Project EIR has been certified, the environmental impacts of the revised project proposed for the Wastewater Treatment Plant Improvement Project must be examined in light of the impact analysis in the certified EIR and 2014 Addendum to determine whether additional CEQA documentation must be prepared. One of the standards that applies is whether, under Public Resources Code Section 21166 and State CEQA Guidelines Sections 15162 and 15163, there are new significant effects or other grounds that require preparation of a subsequent EIR or supplemental EIR in support of further agency action on the project. Under these guidelines, a subsequent or supplemental EIR is to be prepared if any of the following criteria are met.

- (a) When an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
 - (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
 - (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) 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 the mitigation measure or alternative; or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

As demonstrated in the environmental analysis provided in Section 3.0, Environmental Analysis, of this document, none of the conditions that had been analyzed in the City of Jackson Wastewater Treatment Plant Improvement Project EIR and 2014 Addendum would change with adoption and implementation of the revised project. Furthermore, no new information of substantial importance meeting the criteria listed in State CEQA Guidelines Section 15162(a)(3)(A–D) has been identified.

STATE WATER RESOURCES CONTROL BOARD REQUIREMENTS

The State Water Resources Control Board (SWRCB) uses the CEQA review process and compliance with federal environmental laws and regulations to satisfy the environmental requirements of the Clean Water State Revolving Fund (CWSRF) Program Operating Agreement between the United States Environmental Protection Agency and the SWRCB. The issuance of funds from the CWSRF Program is equivalent to a federal action, and thus, compliance with federal environmental laws and regulations is required for projects being funded under the CWSRF Program. In addition to CEQA compliance, the SWRCB is required to document environmental compliance with federal environmental laws and regulations. The 2013 EIR provided the pertinent information demonstrating the revised project's compliance with

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appropriate federal laws and regulations, including the items below. The project's compliance with these provisions is documented in the 2013 EIR, Addendum, and this document.

- The project must obtain approval from the US Fish and Wildlife Service for any potential effects to special-status species.
- The City will need to identify whether the project will involve any direct effects from construction activities or indirect effects that may affect federally listed species.
- The project must comply with Section 106 of the National Historic Preservation Act.
- The project must have State Historic Preservation Officer consultation.
- In conjunction with the project, a copy of all current records searches for the project area must be requested.
- The project must list the requirements for Native American and Interested Party Consultation under Section 106.
- The project must comply with federal Clean Air Act provisions, including the provision of air quality studies.
- The project must comply with the Migratory Bird Treaty Act by listing birds and protection measures.
- The project must protect wetlands by identification of impacts and mitigation measures.
- The project must comply with the Coastal Zone Management Act.
- The project must identify if the project is in a Flood Management Zone and include a Federal Emergency Management Agency flood zone map.
- The project must comply with the Farmland Protection Policy Act.

1.3 ORGANIZATION AND SCOPE

SECTION 1.0 – INTRODUCTION

Section 1.0 provides an introduction and overview describing the intended use of the City of Jackson Wastewater Treatment Plant Improvement Project EIR Addendum #2.

SECTION 2.0 – PROJECT DESCRIPTION

This section describes the proposed project.

SECTION 3.0 – ENVIRONMENTAL ANALYSIS

This section contains an analysis of environmental topic areas that were addressed in the City of Jackson Wastewater Treatment Plant Improvement Project EIR and 2014 Addendum and the potential impacts of the proposed minor design and operational changes.

2.1 INTRODUCTION

This section provides a description of the minor modifications to the approved design for the Jackson Wastewater Treatment Plant Improvement Project that is evaluated in this Addendum #2. Please refer to Section 3.0, Environmental Analysis, of this document for the analysis of environmental effects of this project in relation to the previous analysis provided in the City of Jackson Wastewater Treatment Plant Improvement Project EIR – State Clearinghouse No. 2011062026 (City of Jackson 2013) and the 2014 Addendum (City of Jackson 2014).

2.2 PROJECT DESCRIPTION

Changes to the WWTP needed to achieve project objectives to the extent reasonable via the revised project were presented in Table 2.0-2 in the 2014 Addendum (page 2.0-9). Some of the changes identified in Table 2.0-2 have been implemented, while others were determined to be unnecessary. A few minor changes have been identified since the 2014 Addendum, which comprise the focus of this Addendum #2.

Table 2.0-2 from the 2014 Addendum has been reproduced herein as **Table 2.0-1** and has been expanded to show the improvements that have been completed or are no longer necessary and minor additions/changes to the previously approved revised project that are the subject of this Addendum #2.

**TABLE 2.0-1
PROPOSED MINOR DESIGN AND OPERATIONAL CHANGES (PROJECT DESCRIPTION)**

Approved Revised Project	Change From Approved Revised (2014) Project	Design/Operational Feature Change Requiring Evaluation in this Addendum #2?
<p>1. Improved dissolved oxygen control in the oxidation ditches to maximize the efficiency of the simultaneous nitrification and denitrification process. Improvements include (1) the addition of dissolved oxygen sensors in each oxidation ditch; (2) improvements to the existing aeration rotors to optimize their control and response to input, including putting variable speed drives on the motors; (3) improvements to the oxidation ditch effluent weirs to maximize control of the water level and optimize the corresponding control and response of the rotor oxygenation process; and (4) installation of a Supervisory Control and Data Acquisition (SCADA) system to receive input from the oxygen sensors and (a) provide that input to operators who can then manually adjust the aeration equipment, (b) allow the SCADA system to automatically adjust the aeration equipment in response to programmed algorithm to maintain a preset oxygen concentration in the oxidation ditch, and (c) collect historical data records. Any dissolved oxygen improvements would include any and all necessary appurtenances for a whole and complete operating system, including electrical improvements, mounting and hardware equipment, site work improvements, computer hardware and software, etc. (Some portions of these improvements have been, or are being, implemented).</p>	<p>Item (4) SCADA system has been installed.</p>	<p>No</p>

2.0 PROJECT DESCRIPTION

Approved Revised Project	Change From Approved Revised (2014) Project	Design/Operational Feature Change Requiring Evaluation in this Addendum #2?
<p>2. Addition of magnesium hydroxide storage and feed facilities at the headworks of the treatment plant to provide pH control through the treatment process and optimize the simultaneous nitrification and denitrification process. Improvements include chemical storage and containment facilities; mixing equipment; insulation and/or heating equipment for thermal control; chemical feed pumps and controls; piping and site improvements; electrical and instrumentation equipment; and all ancillary facilities for a whole and complete pH control facility. SCADA facilities may also be included to provide automation, alarms, historical data collection and efficient operations (Some portions of these improvements have been, or are being, implemented). Improvements to pH control are the same as with the proposed project.</p>	<p>Magnesium hydroxide pH control system has been installed.</p>	<p>No</p>
<p>3. Addition of separate denitrification facilities, if needed, to provide stable nitrification and denitrification through the treatment process to remove ammonia and nitrate from the effluent. Improvements include separate anoxic basins upstream of the oxidation ditches; mixing equipment; flow measuring and flow splitting equipment; recycle pumps and piping; electrical and instrumentation improvements; site and piping work; and all ancillary facilities to provide a complete and operating nitrification and denitrification process. SCADA facilities may also be included to provide automation, alarms, historical data collection and efficient operations.</p>	<p>Separate denitrification facilities determined to be unnecessary. Denitrification will be accomplished within the existing oxidation ditches.</p>	<p>Yes</p>
<p>4. Addition of effluent filter capacity and filtration related improvements to improve filter performance and capacity. Improvements include the addition of new sand filters or similar filtration equipment to augment capacity; improvements to the filter coagulation chemical feed, mixing, and flocculation facilities; improvements to the backwash storage and pumping facilities; improvements to the backwash waste facilities; control and alarm improvements; electrical and instrumentation; site and piping improvements; and all ancillary facilities for a whole and complete effluent filter facility.</p>	<p>Disk filters will be used in lieu of sand filters. New chemical feed, mixing, and flocculation facilities determined to be unnecessary.</p>	<p>Yes (change to disk filters)</p>
<p>5. Addition of UV disinfection to the treatment process. Improvements include UV hydraulic structures; lamp channels; motor control center building; compressors; protective canopy or building; overhead crane; electrical and instrumentation; site and piping improvements; and all ancillary facilities for a whole and complete UV disinfection facility. SCADA facilities may also be included to provide automation, alarms, historical data collection and efficient operations. The chlorine disinfection facilities may be retained for emergency use in the event of a treatment process upset that renders the UV disinfection system ineffective.</p>	<p>Compressors and overhead crane determined to be unnecessary. UV facility will be under a canopy but not inside a building.</p>	<p>Yes</p>

2.0 PROJECT DESCRIPTION

Approved Revised Project	Change From Approved Revised (2014) Project	Design/Operational Feature Change Requiring Evaluation in this Addendum #2?
6. Addition of ozonation and activated carbon filter facilities to remove refractory organics from the effluent, if needed. Improvements include liquid oxygen storage and containment facilities; ozone generation equipment; ozone contact and mixing basin; and all necessary pump, pipe and control facilities. The activated carbon filters will include the activated carbon filter vessels, mounting/foundation facilities, feed pump, backwash pump, and pipe and control facilities. Both facilities will require electrical and instrumentation improvements, site and pipe improvements, and ancillary facilities for a whole, complete, and operable system. SCADA facilities may also be included to provide automation, alarms, and historical data collection for an efficient operation.	Ozone and activated carbon facilities determined to be unnecessary.	No
7. Influent or effluent storage to allow for a temporary cease in the discharge to Jackson Creek if there is a plant upset and the possibility for an effluent or receiving water violation. The storage would only be until the plant could be restored to optimal performance. Any water diverted to storage would be returned for treatment and discharge to Jackson Creek. The storage could be in the form of a lined earthen basin upstream of the plant, utilizing a gravity diversion from the influent sewer or a pumped fill from the plant influent headworks area or effluent facilities. The storage basin could also be a concrete basin or a steel tank near the plant.	Influent/effluent storage facilities determined to be unnecessary due to provision of redundant treatment capacity.	No
8. Solids dewatering improvements to increase the percent solids of the waste sludge for disposal at landfill facilities. The existing belt filter press is aged and no longer can produce solids that meet the current percent solids standards of most landfills. Possible new facilities could consist of a new belt filter press, centrifuge, or other dewatering technology.	New dewatering equipment will be a screw press.	Yes
9. Electrical, instrumentation, standby power, yard piping, site work, and other ancillary improvements to make a whole and complete operable project.	No changes	No

INTRODUCTION

On March 11, 2013, the Jackson City Council certified the City of Jackson Wastewater Treatment Plant Improvement Project Final EIR. The 2014 Addendum analyzed each identified issue area in the Wastewater Treatment Plant Improvement Project EIR and determined that none of the conditions that had been analyzed in the City of Jackson Wastewater Treatment Plant Improvement Project EIR would change with adoption and implementation of the revised project evaluated in the 2014 Addendum, and that no new information of substantial importance meeting the criteria listed in State CEQA Guidelines Section 15162(a)(3)(A–D) had been identified. The 2014 Addendum also concluded that mitigation measures associated with the construction and/or operation of the storage basins and effluent application areas for the previous project would not be required with implementation of the revised project.

This section of the Addendum #2 provides analysis and substantial evidence supporting the City's determination that implementation of the proposed minor design and operational changes would not meet the criteria for preparing a subsequent or supplemental EIR under State CEQA Guidelines Section 15162 and consistent with the provisions of State CEQA Guidelines Section 15183.5.

Implementation of the proposed changes would not cause any new significant impacts or substantially increase the severity of previously identified significant impacts identified in the previous project's EIR (per State CEQA Guidelines Section 15162[a][1]) which would require major revisions to the City of Jackson Wastewater Treatment Plant Improvement EIR – State Clearinghouse No. 2011062026. All impacts associated with adoption and implementation of the revised project would be equivalent to, or less than, the impacts previously analyzed in the Wastewater Treatment Plant Improvement Project EIR and the 2014 Addendum.

Second, implementation of the proposed minor design and operational changes would not result in substantial changes in physical circumstances that would cause a new significant impact or substantially increase the severity of a previously identified significant impact, and there have been no other changes in the circumstances that meet this criterion (State CEQA Guidelines Section 15162[a][2]). There have been no changes in the environmental conditions that were not contemplated and analyzed in the City of Jackson Wastewater Treatment Plant Improvement EIR and 2014 Addendum that would result in new or substantially more severe environmental impacts in association with implementation of the proposed changes evaluated in this Addendum #2.

Third, as documented in this section, there is no new information of substantial importance (which was not known or could not have been known at the time of the certification of the City of Jackson Wastewater Treatment Plant Improvement EIR on March 11, 2013) and at the time of adoption of the 2014 Addendum that shows any of the following:

1. A new significant impact (condition A under State CEQA Guidelines Section 15162[a][3]).
2. A substantial increase in the severity of a previously identified significant impact (condition B under State CEQA Guidelines Section 15162[a][3]).
3. Mitigation measures or alternatives previously found infeasible that would now be feasible and would substantially reduce one or more significant effects of the General Plan; or mitigation measures or alternatives which are considerably different from those analyzed in the Jackson Wastewater Treatment Plant Improvement EIR which would

3.0 ENVIRONMENTAL ANALYSIS

substantially reduce one or more significant effects on the environment (conditions C and D under State CEQA Guidelines Section 15162[a][3]).

ENVIRONMENTAL ANALYSIS

3.1 AIR QUALITY

Air quality impacts were evaluated in the Wastewater Treatment Plant Improvement Project EIR (Section 3.1) and in the 2014 Addendum (Section 3.1, pages 3.0-2 through 3.0-4). The analysis addressed construction and operational air emissions, odors, mobile-source carbon monoxide concentrations, and toxic air contaminants.

Potential Impacts of Proposed Changes

The change to disk filters instead of sand filters, location of the UV facility under a canopy, and use of a screw press instead of other previously considered methods for dewatering would not result in construction-related or operational air emissions beyond what was evaluated in the EIR and 2014 Addendum. Use of the existing oxidation ditches for denitrification would not represent a change from existing conditions and therefore would not have the potential for an environmental effect on air quality.

New or Increased Severity of Significant Impacts

The proposed design changes would not result in new or more severe air quality impacts that were not addressed in the Wastewater Treatment Plant Improvement Project EIR and 2014 Addendum.

Substantial Changes in the Circumstances or New Information Associated with the Proposed Changes

There are no changed circumstances or new information meeting the standards for requiring further environmental review under State CEQA Guidelines Section 15162. Adoption and implementation of the proposed design and operational changes would not result in new or more severe air quality impacts beyond what was addressed in the Wastewater Treatment Plant Improvement Project EIR and 2014 Addendum and would not meet any other criteria under State CEQA Guidelines Section 15162(a)(3).

3.2 BIOLOGICAL RESOURCES

Biological resources impacts were evaluated in the Wastewater Treatment Plant Improvement Project EIR (Section 3.2) and 2014 Addendum (Section 3.2, pages 3.0-5 through 3.0-10). The analysis addressed construction and operational impacts on special-status species, nesting raptors and migratory birds, oak woodlands, and wetlands and waters of the United States, including effects on Jackson Creek and associated riparian habitat.

Potential Impacts of Proposed Changes

The proposed design and operational changes would occur entirely within the existing footprint of the plant facilities. No changes in wastewater discharges are proposed. Therefore, there would be no impact on biological resources.

New or Increased Severity of Significant Impacts

The proposed design changes would not result in new or more severe biological resources impacts that were not addressed in the Wastewater Treatment Plant Improvement Project EIR and 2014 Addendum.

Substantial Changes in the Circumstances or New Information Associated with the Proposed Changes

There are no changed circumstances or new information meeting the standards for requiring further environmental review under State CEQA Guidelines Section 15162. Adoption and implementation of the proposed design and operational changes would not result in new or more severe biological resources impacts beyond what was addressed in the Wastewater Treatment Plant Improvement Project EIR and 2014 Addendum and would not meet any other criteria under State CEQA Guidelines Section 15162(a)(3).

3.3 CLIMATE CHANGE AND ENERGY CONSUMPTION

Greenhouse gas (GHG) emissions and energy consumption were evaluated in the Wastewater Treatment Plant Improvement Project EIR (Section 3.3) and 2014 Addendum (Section 3.3, pages 3.0-11 through 3.0-13). The analysis addressed compliance with Assembly Bill 32 (AB 32) and associated Scoping Plan and energy conservation considerations set forth in Appendix F of the CEQA Guidelines. The analysis concluded both the previously approved and revised project would not conflict with AB 32 and the Scoping Plan.

Potential Impacts of Proposed Changes

The change to disk filters instead of sand filters, location of the UV facility under a canopy, use of a screw press instead of other previously considered methods for dewatering, and denitrification in existing ditches would not result in construction-related GHG emissions beyond what was evaluated in the EIR and 2014 Addendum. Operational GHG emissions would occur as a result of WWTP processes and energy use; however, the proposed modifications are minor changes to existing processes that would have a negligible effect on GHG emissions and not beyond what was evaluated in the EIR and 2014 Addendum. There would be little, if any, change in energy demand.

3.0 ENVIRONMENTAL ANALYSIS

New or Increased Severity of Significant Impacts

The proposed design changes would not result in new or more severe climate change and energy consumption impacts that were not addressed in the Wastewater Treatment Plant Improvement Project EIR and 2014 Addendum.

Substantial Changes in the Circumstances or New Information Associated with the Proposed Changes

Subsequent to the EIR and 2014 Addendum, Executive Order B-30-15 established a medium-term goal for 2030 of reducing GHG emissions by 40 percent below 1990 levels and requires the California Air Resources Board (CARB) to update its current AB 32 Scoping Plan to identify the measures to meet the 2030 target. There are current (2015/2016) proposals (Senate Bill 32) at the state legislature to establish a statutory target for 2030.

In addition, in November 2015, the California Supreme Court decided *Center for Biodiversity et al. v. California Department of Fish and Wildlife* (62 Cal. 4th 204) which addressed how GHG analyses should be conducted, including affirmation of the use of AB 32 GHG reduction targets as a threshold. The analysis in the Wastewater Treatment Plant Improvement Project EIR and 2014 Addendum identified the project utilized AB 32 GHG reduction targets as the improvements are expected to be completed prior to the year 2020.

There are no aspects of the proposed design and operational changes that would result in any inconsistency with the updated AB 32 requirements and Scoping Plan or published case law. There are no other changed circumstances or new information meeting the standards for requiring further environmental review under State CEQA Guidelines Section 15162. Adoption and implementation of the proposed design and operational changes would not result in new or more severe climate change and energy consumption impacts beyond what was addressed in the Wastewater Treatment Plant Improvement Project EIR and 2014 Addendum and would not meet any other criteria under State CEQA Guidelines Section 15162(a)(3).

3.4 CULTURAL AND PALEONTOLOGICAL RESOURCES

Cultural and paleontological resources impacts were evaluated in the Wastewater Treatment Plant Improvement Project EIR (Section 3.4) and 2014 Addendum (Section 3.4, pages 3.0-13 through 3.0-14). The analysis addressed archaeological, prehistoric, and historic resources (including determination of whether any project area features were eligible under Section 106 of the National Historic Preservation Act) as well as paleontological resources and the potential for encountering these resources during construction.

Potential Impacts of Proposed Changes

The proposed design and operational changes would occur entirely within the existing footprint of the plant facilities. No ground disturbance would be required. Therefore, there would be no impact on cultural and paleontological resources.

New or Increased Severity of Significant Impacts

The proposed design changes would not result in new or more severe cultural and paleontological resources impacts that were not addressed in the Wastewater Treatment Plant Improvement Project EIR and 2014 Addendum.

Substantial Changes in the Circumstances or New Information Associated with the Proposed Changes

There are no changed circumstances or new information meeting the standards for requiring further environmental review under State CEQA Guidelines Section 15162. Adoption and implementation of the proposed design and operational changes would not result in new or more severe cultural and resources impacts beyond what was addressed in the Wastewater Treatment Plant Improvement Project EIR and 2014 Addendum and would not meet any other criteria under State CEQA Guidelines Section 15162(a)(3).

3.5 GEOLOGY AND SOILS

Geology and soils impacts were evaluated in the Wastewater Treatment Plant Improvement Project EIR (Section 3.5) and 2014 Addendum (Section 3.5, pages 3.0-14 through 3.0-16). The analysis addressed earthquakes and seismic hazards, erosion, unstable soils, and expansive soils.

Potential Impacts of Proposed Changes

The proposed design and operational changes would occur entirely within the existing footprint of the plant facilities. No ground disturbance or construction of new buildings would be required that would result in erosion or unstable soils hazards. The proposed features could be subject to seismic hazards such as groundshaking, but not to any greater extent than existing facilities, and the features would not affect how existing facilities would perform structurally during an earthquake.

New or Increased Severity of Significant Impacts

The proposed design changes would not result in new or more severe geology and soils impacts that were not addressed in the Wastewater Treatment Plant Improvement Project EIR and 2014 Addendum.

Substantial Changes in the Circumstances or New Information Associated with the Proposed Changes

There are no changed circumstances or new information meeting the standards for requiring further environmental review under State CEQA Guidelines Section 15162. Adoption and implementation of the proposed design and operational changes would not result in new or more severe geology and soils impacts beyond what was addressed in the Wastewater Treatment Plant Improvement Project EIR and 2014 Addendum and would not meet any other criteria under State CEQA Guidelines Section 15162(a)(3).

3.6 HAZARDOUS MATERIALS/HUMAN HEALTH

Hazardous materials/human health impacts were evaluated in the Wastewater Treatment Plant Improvement Project EIR (Section 3.6) and 2014 Addendum (Section 3.6, pages 3.0-16 through 3.0-19). The analysis addressed hazardous materials use (which includes use of filters and chemical processes), emergency response, residual agricultural chemicals in soils, wildland fire hazard, and mosquito vectors.

3.0 ENVIRONMENTAL ANALYSIS

Potential Impacts of Proposed Changes

The proposed changes would not result in additional hazardous materials use beyond that previously evaluated, and therefore would not increase the risk of accidental release or require additional transport or disposal of hazardous materials or wastes. The proposed design and operational changes would occur entirely within the existing footprint of the plant facilities. Therefore, there would be no impacts related to soil contamination, wildland fire hazard, or emergency access. Use of existing oxidation ditches for denitrification would not represent a change that would increase mosquito vector hazard.

New or Increased Severity of Significant Impacts

The proposed design changes would not result in new or more severe hazardous materials/human health impacts that were not addressed in the Wastewater Treatment Plant Improvement Project EIR and 2014 Addendum.

Substantial Changes in the Circumstances or New Information Associated with the Proposed Changes

There are no changed circumstances or new information meeting the standards for requiring further environmental review under State CEQA Guidelines Section 15162. Adoption and implementation of the proposed design and operational changes would not result in new or more severe hazardous materials/human health impacts beyond what was addressed in the Wastewater Treatment Plant Improvement Project EIR and 2014 Addendum and would not meet any other criteria under State CEQA Guidelines Section 15162(a)(3).

3.7 HYDROLOGY AND WATER QUALITY

Hydrology and water quality impacts were evaluated in the Wastewater Treatment Plant Improvement Project EIR (Section 3.7) and 2014 Addendum (Section 3.7, pages 3.0-19 through 3.0-22). The analysis addressed construction and operational water quality (including discharges to Jackson Creek), flooding associated with plant expansion and discharges to Jackson Creek, and groundwater quality (from land disposal, which is not used).

Potential Impacts of Proposed Changes

The proposed design and operational changes would occur entirely within the existing footprint of the plant facilities. No construction that would result in construction site runoff would occur beyond what was evaluated in the EIR and 2014 Addendum, and there would be no development that would alter drainage patterns that could affect flood hazard. No changes in the quantity or type of wastewater discharges are proposed. Use of the existing oxidation ditches for denitrification would not result in a change from existing conditions that would result in a water quality impact. Therefore, there would be no impact on hydrology and water quality.

New or Increased Severity of Significant Impacts

The proposed design changes would not result in new or more severe hydrology and water quality impacts that were not addressed in the Wastewater Treatment Plant Improvement Project EIR and 2014 Addendum.

Substantial Changes in the Circumstances or New Information Associated with the Proposed Changes

There are no changed circumstances or new information meeting the standards for requiring further environmental review under State CEQA Guidelines Section 15162. Adoption and implementation of the proposed design and operational changes would not result in new or more severe hydrology and water quality impacts beyond what was addressed in the Wastewater Treatment Plant Improvement Project EIR and 2014 Addendum and would not meet any other criteria under State CEQA Guidelines Section 15162(a)(3).

3.8 LAND USE AND AESTHETICS

Land use and aesthetics impacts were evaluated in the Wastewater Treatment Plant Improvement Project EIR (Section 3.8) and 2014 Addendum (Section 3.8, pages 3.8-22 through 3.0-25). The analysis addressed conflicts with land use plans, policies, and regulations, compatibility with adjacent land uses, visual character and views, and light and glare.

Potential Impacts of Proposed Changes

The proposed design and operational changes would occur entirely within the existing footprint of the plant facilities. Therefore, there would be no land use planning or compatibility impacts. The disk filters, canopy for the UV facility, and screw press would not be visible from off-site locations. There would be no change in the oxidation ditches. There would be no land use or aesthetics impacts.

New or Increased Severity of Significant Impacts

The proposed design changes would not result in new or more severe land use and aesthetics impacts that were not addressed in the Wastewater Treatment Plant Improvement Project EIR and 2014 Addendum.

Substantial Changes in the Circumstances or New Information Associated with the Proposed Changes

There are no changed circumstances or new information meeting the standards for requiring further environmental review under State CEQA Guidelines Section 15162. Adoption and implementation of the proposed design and operational changes would not result in new or more severe land use and aesthetics impacts beyond what was addressed in the Wastewater Treatment Plant Improvement Project EIR and 2014 Addendum and would not meet any other criteria under State CEQA Guidelines Section 15162(a)(3).

3.9 NOISE

Noise impacts were evaluated in the Wastewater Treatment Plant Improvement Project EIR (Section 3.9) and 2014 Addendum (Section 3.9, pages 3.8-25 through 3.0-27). The analysis addressed construction noise and vibration and operational pump station noise at the plant.

Potential Impacts of Proposed Changes

The proposed design and operational changes would occur entirely within the existing footprint of the plant facilities. Therefore, there would be no construction noise or vibration impacts

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beyond what was evaluated in the EIR and 2014 Addendum. Process-related features such as disk filters and screw press would be a source of noise, but would be a component of overall noise levels already generated at the plant. No changes are proposed that would affect pump noise levels.

New or Increased Severity of Significant Impacts

The proposed design changes would not result in new or more severe noise impacts that were not addressed in the Wastewater Treatment Plant Improvement Project EIR and 2014 Addendum.

Substantial Changes in the Circumstances or New Information Associated with the Proposed Changes

There are no changed circumstances or new information meeting the standards for requiring further environmental review under State CEQA Guidelines Section 15162. Adoption and implementation of the proposed design and operational changes would not result in new or more severe noise impacts beyond what was addressed in the Wastewater Treatment Plant Improvement Project EIR and 2014 Addendum and would not meet any other criteria under State CEQA Guidelines Section 15162(a)(3).

3.10 TRAFFIC AND CIRCULATION

Traffic and circulation impacts were evaluated in the Wastewater Treatment Plant Improvement Project EIR (Section 3.10) and 2014 Addendum (Section 3.10, pages 3.8-27 and 3.0-28). The analysis addressed construction traffic, operational impacts on traffic, and roadway hazards.

Potential Impacts of Proposed Changes

The proposed design and operational changes would occur entirely within the existing footprint of the plant facilities and would not involve new construction (other than the canopy for the UV facility, which would be of limited extent) beyond what was evaluated in the EIR and 2014 Addendum. Therefore, there would be no construction-related traffic or roadway hazard impacts. There would be no change in the amount of biosolids that would require off-site hauling, and no changes in the number of employees. Therefore, there would be no operational traffic impacts.

New or Increased Severity of Significant Impacts

The proposed design changes would not result in new or more severe traffic and circulation impacts that were not addressed in the Wastewater Treatment Plant Improvement Project EIR and 2014 Addendum.

Substantial Changes in the Circumstances or New Information Associated with the Proposed Changes

There are no changed circumstances or new information meeting the standards for requiring further environmental review under State CEQA Guidelines Section 15162. Adoption and implementation of the proposed design and operational changes would not result in new or more severe traffic and circulation impacts beyond what was addressed in the Wastewater

Treatment Plant Improvement Project EIR and 2014 Addendum and would not meet any other criteria under State CEQA Guidelines Section 15162(a)(3).

3.11 SOLID WASTE

Solid impacts were evaluated in the Wastewater Treatment Plant Improvement Project EIR (Section 3.11) and 2014 Addendum (Section 3.11, page 3.0-29). The analysis addressed generation of biosolid waste as a function of increased effluent flows.

Potential Impacts of Proposed Changes

The proposed changes would not result in changes in processes that would generate additional biosolids beyond what was evaluated in the EIR and 2014 Addendum. There would be no solid waste impacts.

New or Increased Severity of Significant Impacts

The proposed design changes would not result in new or more severe solid waste impacts that were not addressed in the Wastewater Treatment Plant Improvement Project EIR and 2014 Addendum.

Substantial Changes in the Circumstances or New Information Associated with the Proposed Changes

There are no changed circumstances or new information meeting the standards for requiring further environmental review under State CEQA Guidelines Section 15162. Adoption and implementation of the proposed design and operational changes would not result in new or more severe solid waste impacts beyond what was addressed in the Wastewater Treatment Plant Improvement Project EIR and 2014 Addendum and would not meet any other criteria under State CEQA Guidelines Section 15162(a)(3).

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4.0 REFERENCES

City of Jackson. 2013. *City of Jackson Wastewater Treatment Plant Improvement Project Final EIR* (SCH# 2011062026).

———. 2014. *City of Jackson Wastewater Treatment Plant Improvement Project Addendum to the Final EIR* (SCH# 2011062026).

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