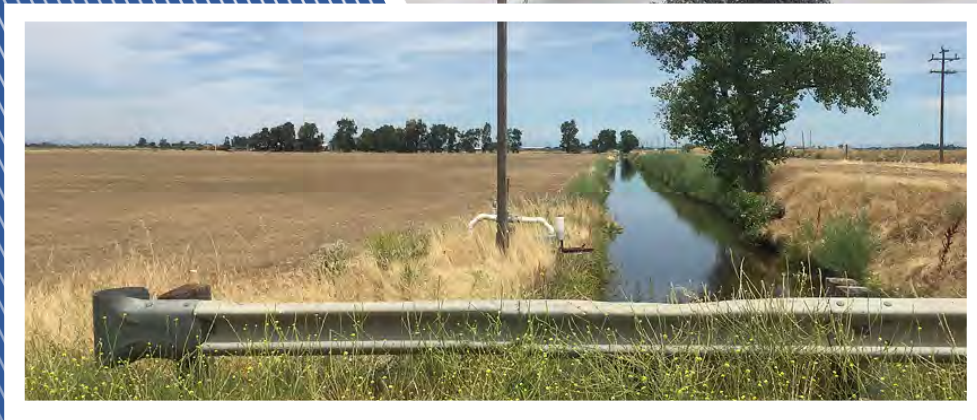


Initial Study Checklist  
for the Sacramento Regional County Sanitation District

# Harvest Water Program Lateral Pipelines and On-Farm Connections Project



Prepared for:



Sacramento Regional County Sanitation District  
10060 Goethe Road  
Sacramento, CA 95827

August 2020

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## LIST OF ABBREVIATIONS

AB	Assembly Bill
ADWF	average dry weather flow
AFY	acre feet per year
Air Quality and GHG Technical Report	<i>Air Quality and Greenhouse Gas Technical Report for the Regional San South County Ag Program, Lateral Pipelines and On-Farm Connections Project</i>
AQMP	Air Quality Management Plan
Biological Resources Technical Report	<i>Biological Resources Technical Report for the Sacramento Regional County Sanitation District South County Ag Program Lateral Pipelines and On-Farm Connections Project</i>
BMP	best management practice
CAAQS	California ambient air quality standards
Caltrans	California Department of Transportation
CEC	constituent of emerging concern
Cultural Survey Report	<i>Sacramento Regional County Sanitation District Recycled Water Distribution Mains, Lateral Pipelines, and On-Farm Connections Project, CEQA Cultural Resources Survey Report</i>
CVRWQCB	Central Valley Regional Water Quality Control Board
CY	cubic yards
EIR	Environmental Impact Report
FAA	Federal Aviation Administration
FHSZ	fire hazard severity zone
GHG	greenhouse gas
HDD	horizontal directional drilling
I-5	Interstate 5
LRA	Local Responsibility Area
mgd	million-gallons-per-day
MTCO <sub>2</sub> e	metric tons of carbon dioxide equivalent
MWh/yr	megawatts per year
NAAQS	national ambient air quality standards
NOP	notice of preparation
NPDES	National Pollutant Discharge Elimination System
NWR	National Wildlife Refuge
PM <sub>10</sub>	respirable particulate matter with aerodynamic diameter of 10 micrometers or less

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PM <sub>2.5</sub>	fine particulate matter with aerodynamic diameter of 2.5 micrometers or less
Program EIR	South County Ag Program EIR
Regional San	Sacramento Regional County Sanitation District
ROW	rights-of-way
SCGA	Sacramento Central Groundwater Authority
SMAQMD	Sacramento Metropolitan Air Quality Management District
SRA	State Responsibility Area
SRWTP	Sacramento Regional Wastewater Treatment Plant
SSHCP	South Sacramento Habitat Conservation Plan
SWPPP	stormwater pollution prevention plan
SWRCB	State Water Resources Control Board
TCR	tribal cultural resource
TMP	traffic management plan
VMT	vehicle miles traveled
WDR	Waste Discharge Requirement
WRF	Water Recycling Facility
WUI	wildland urban interface

# 1 PROJECT INFORMATION

<b>Project title:</b>	Lateral Pipelines and On-Farm Connections Project
<b>Project location:</b>	The project area is located in Sacramento County, and the approximate boundaries are Interstate 5 (I-5) to the west, Highway 99 and the Cosumnes River to the east, Bilby Road to the north, and the Cosumnes River Preserve to the south. A portion of the project area is located west of I-5 comprised of the Stone Lakes National Wildlife Refuge and lands between the refuge and I-5.
<b>Lead agency's name and address:</b>	Sacramento Regional County Sanitation District (Regional San) 10060 Goethe Road Sacramento, CA 95827
<b>Contact person:</b>	Gayleen Darting, Project Manager 916.875.6425
<b>Project sponsor's name and address:</b>	Same as Lead Agency
<b>Location of administrative record:</b>	Same as Lead Agency
<b>Previously Certified South Sacramento County Agriculture and Habitat Lands Recycled Water Program EIR:</b>	<p>This checklist documents that the project is within the scope of the Environmental Impact Report (EIR) for the Sacramento Regional County Sanitation District's (Regional San's) South Sacramento County Agriculture and Habitat Lands Recycled Water Program (Program EIR) (State Clearinghouse No. 2015022067). The EIR acted as a project EIR for some project elements and a program EIR for other project elements. This checklist evaluates a portion of program EIR elements. The Harvest Water Program (formerly, the South County Ag Program) would provide a safe and reliable supply of tertiary-treated recycled water for agricultural uses, reduce groundwater pumping, support habitat enhancement efforts, and provide near-term benefits to the region. The Program EIR is available for review at the following locations:</p> <ul style="list-style-type: none"><li>▶ Regional San office at 10060 Goethe Road in Sacramento, and</li><li>▶ Online at: <a href="https://www.regionalsan.com/socoag">https://www.regionalsan.com/socoag</a>.</li></ul>

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## 2 INTRODUCTION

### 2.1 PURPOSE OF THIS INITIAL STUDY CHECKLIST

Regional San proposes to implement the Harvest Water Program (formerly, the South County Ag Program), which would provide a safe and reliable supply of tertiary-treated recycled water for agricultural uses, reduce groundwater pumping, support habitat enhancement efforts, and provide near-term benefits to the region. Regional San prepared a program EIR to analyze the environmental effects of the Harvest Water Program and certified the EIR in March 2017 (SCH No. 2015022067) (Regional San 2017). The Program EIR included both program- and project-level analyses depending on the level of detail available at the time for each program element. The following program elements now require the preparation of supplemental CEQA documentation because they were not addressed at a project-level in the EIR:

- ▶ Lateral pipelines and on-farm connections,
- ▶ Wintertime application of recycled water to agricultural lands, and
- ▶ Ecosystem improvements.

Program EIRs provide a tiering mechanism to allow for the efficient processing of subsequent projects that are within the scope of the program EIR, with little –to only minor additional CEQA analysis. CEQA and the State CEQA Guidelines encourage the use of tiered environmental documents to reduce delays and excessive paperwork in the environmental review process (State CEQA Guidelines Section 15168). This is accomplished in tiered documents by eliminating repetitive analyses of issues that were already addressed in the program EIR and by incorporating those analyses by reference.

The Lateral Pipelines and On-Farm Connections Project is an element of the Harvest Water Program and is within the scope of activities covered in the environmental impact analysis in the Program EIR. This initial study checklist is used to document that the project is covered by the Program EIR pursuant to Section 15168(c) of the State CEQA Guidelines, which states, “subsequent activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.” Pursuant to Section 15168(c)(4), an agency should use “...a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were covered in the program EIR.”

The organization of project-specific environmental analysis in this initial study checklist follows the same order as the CEQA Appendix G checklist, including two environmental resource areas that were not evaluated in the Program EIR because they were not required at the time of EIR preparation (2016–2017): tribal cultural resources and wildfire. This initial study checklist avoids repetition of general background and setting information, the regulatory context, as well as issues that were evaluated fully in the Program EIR that require no further analysis, including cumulative impacts and alternatives to the Harvest Water Program. Instead, this project-level IS checklist evaluates the more detailed project-level information specific to the Lateral Pipelines and On-Farm Connections Project to document that the project activities are within the scope of activities evaluated in the program EIR.

### 2.2 ORGANIZATION OF THIS INITIAL STUDY CHECKLIST

This initial study checklist is organized as follows:

Chapter 1, “Project Information,” provides summary background information about the project, including project location, lead agency, and contact information.

Chapter 2, “Introduction,” summarizes the scope of the document, relationship to the Program EIR and the document’s organization.

Chapter 3, "Project Description," describes the project location and existing facilities and provides a detailed description of the project.

Chapter 4, "Coverage under the Program EIR," describes the consistency of the project with the Program EIR. This chapter contains the environmental checklist for each resource topic. The impact evaluations focus on whether the project activities are within the scope of the environmental impact analysis in the Program EIR.

Chapter 5, "Applicable Mitigation Measures from the Program EIR," lists measures from the Program EIR that are applicable to the project.

Chapter 6, "References," lists the references used in preparation of this document.

Chapter 7, "List of Preparers," identifies the preparers of this document.

"Appendices," provides additional analysis and documentation supporting the evaluation of whether the project activities are within the scope of the environmental impact analysis included in Chapter 4.

## 3 PROJECT DESCRIPTION

As described in Chapter 2, “Introduction,” the Lateral Pipelines and On-Farm Connections Project is an element of the Harvest Water Program (formerly, the South County Ag Program). This chapter describes the project location and existing facilities and provides a detailed description of the project.

### 3.1 PROJECT LOCATION

The program area is located within Sacramento County, within portions of the City of Elk Grove, unincorporated Sacramento County, and portions of the Stone Lakes National Wildlife Refuge (NWR) (Figure 3-1). The project’s approximate boundaries are Interstate 5 (I-5) to the west, Highway 99 and the Cosumnes River to the east, Bilby Road to the north, and the Cosumnes River Preserve to the south (Figure 3-2). A portion of the project area is located west of I-5 comprised of the Stone Lakes Wildlife Refuge and lands between the refuge and I-5.

Proposed facilities include distribution mains, service connection laterals, and appurtenant facilities. Distribution mains would be located on County and city streets and rural roads, primarily within public road rights-of-way (ROW), although some distribution mains may also be constructed on private agricultural lands. Most service laterals will be located on private agricultural lands, providing connections between distribution mains and a landowner’s agricultural irrigation systems. However, some service laterals may also deliver recycled water for wetlands, habitat enhancement, and similar ecosystem uses.

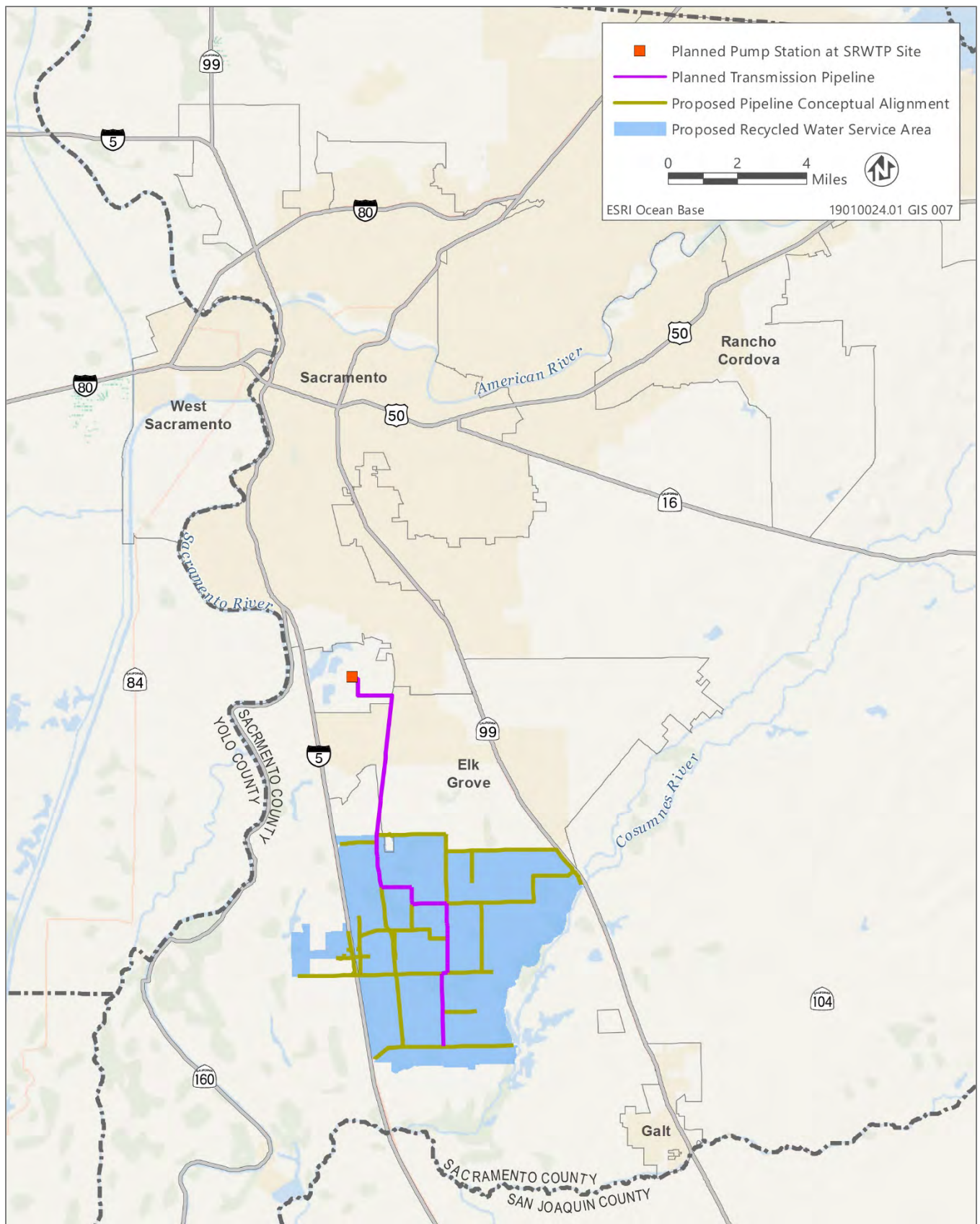
Figure 3-2 shows the conceptual alignments for pipelines in public road ROW, as well as the proposed recycled water service area.

### 3.2 EXISTING FACILITIES

The Sacramento Regional Wastewater Treatment Plant (SRWTP) is located at 8521 Laguna Station Road in Elk Grove on an approximately 3,200-acre site that is owned and operated by Regional San. The entire SRWTP site is located north of Laguna Boulevard in the unincorporated area of Sacramento County, between Franklin Boulevard and I-5 (Figure 3-2). The site’s northern boundary is predominantly south of Cosumnes River Boulevard. Currently, SRWTP treats to a secondary level and discharges the majority of the treated effluent into the Sacramento River near the town of Freeport (Ascent 2014). At the SRWTP, Regional San also operates a Water Recycling Facility (WRF) that produces up to 3.5 million-gallons-per-day (mgd) of tertiary effluent for urban landscape irrigation for the Sacramento County Water Agency (SCWA) and operates a recycled water fill station at the SRWTP.

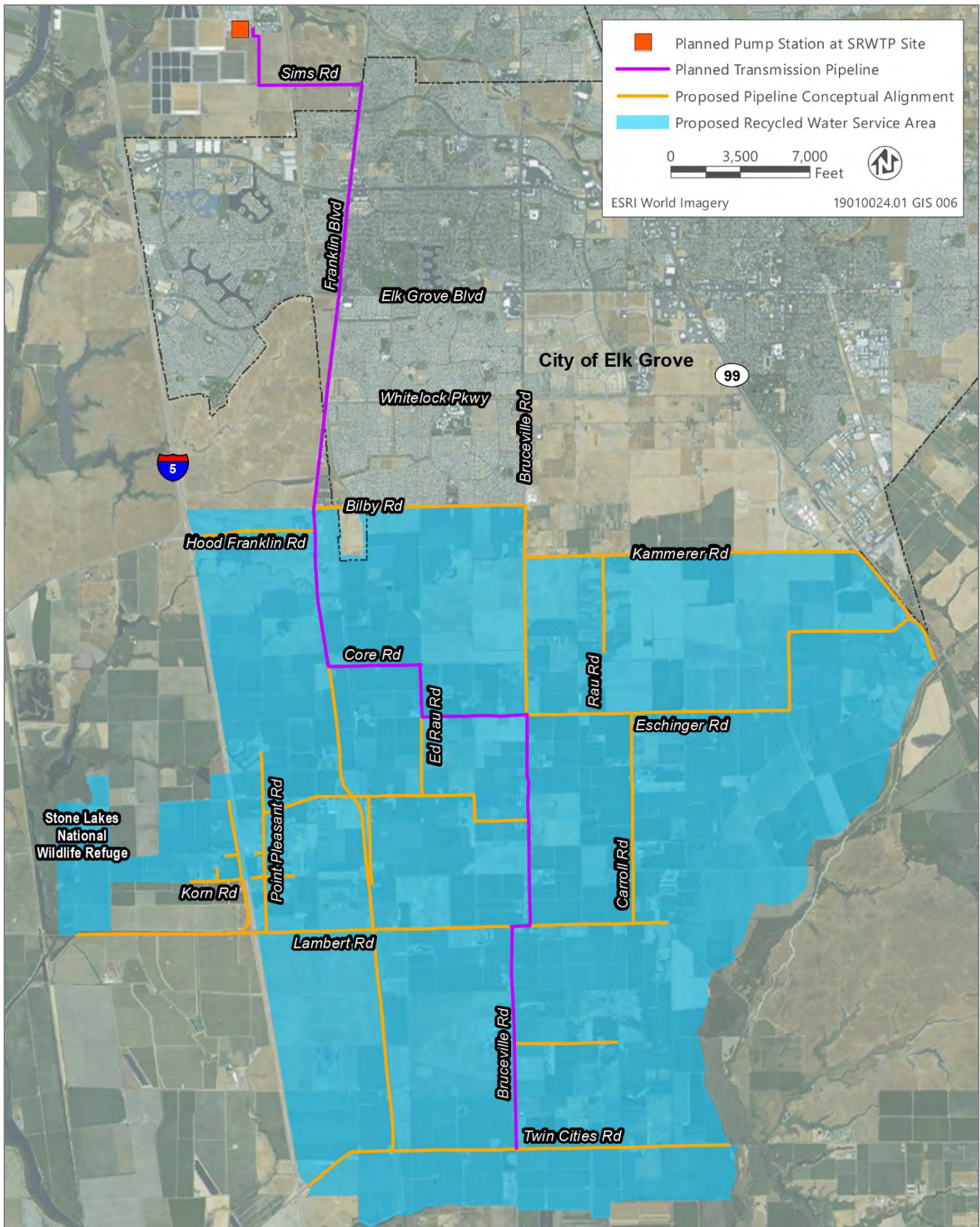
On December 9, 2010, the Central Valley Regional Water Quality Control Board (CVRWQCB) issued new Waste Discharge Requirements (WDRs) for the SRWTP (Order No. R5-2010-114). The WDRs have since been amended several times. The WDRs require treatment upgrades to be operational by December 2023. The National Pollutant Discharge Elimination System (NPDES) permit was most recently renewed in April 2016 (Order No. R5-2016-0020).

WDRs have prompted Regional San to evaluate a multitude of technologies to produce up to 181 mgd average dry weather flow (ADWF) of Title 22 disinfected tertiary recycled water or “equivalent” quality effluent. The collection of new treatment processes at the SRWTP to meet the new WDRs is called the EchoWater project. Following a pilot study of various technologies, Regional San selected Granular Media Filters, biological nutrient removal, and chlorine disinfection technology for complying with the WDR. Construction of the upgrades to the SRWTP began in 2015, with treatment upgrades to be operational by May 2023 (Ascent 2014). The SRWTP is permitted to discharge up to 181 mgd (ADWF) to the Sacramento River. Actual discharges vary seasonally and range from 120 to 205 mgd, with higher wet weather flows occurring in rainy periods (RMC 2015). To maximize use of recycled water, Regional San proposes to beneficially reuse an annual average of up to 45 mgd of the treated effluent that would otherwise be discharged from the SRWTP to the Sacramento River. Deliveries would also vary seasonally, ranging from 24 to 70 mgd (average delivery rate in a maximum month), with highest levels during the peak of the irrigation season. Peak delivery rates on a daily basis would range up to approximately 105 mgd.



Source: Data received from Woodard & Curran in 2020

Figure 3-1 Regional Location



Source: Data received from Woodard & Curran in 2020

Figure 3-2 Project Area

### 3.3 HARVEST WATER PROGRAM

The Harvest Water Program involves delivery of disinfected tertiary-treated water to potential customers in South Sacramento County. Regional San plans to deliver up to 50,000 acre feet per year (AFY) of treated recycled water (including wintertime habitat application) to approximately 16,000 acres of irrigated lands, 400 acres of managed wetlands within the South Stone Lakes area of the NWR, and a potential recharge area, as shown in Figure 3-2 (note: the project area covers approximately 20,400 acres, but not all lands in the area will be irrigated by this program). To maximize use of recycled water, the area proposed for summertime irrigation could also potentially be used for wintertime application for both ecosystem enhancement (primarily for Sandhill Crane roosting and foraging) and wintertime cover crop irrigation (primarily orchards and vineyards) where agreements can be reached with willing landowners. Wintertime application would require regulatory approvals that are not yet in place and it is not an element of this checklist evaluation. Wintertime application, potential delivery of recycled water to the Stone Lakes NWR, and delivery to a potential recharge area, as individual parts of the overall Harvest Water Program, will undergo separate CEQA evaluation when further details of these program elements are available. The initial implementation of the overall program evaluated in this checklist focusses on irrigation during the growing season, which would use an average of 32,500 AFY of recycled water and up to 37,000 AFY in higher demand (drier) years.

The initial phase of the program, already addressed at a project level in the EIR, will include the installation of a pump station within the SRWTP site and up to 13.8 miles of transmission pipelines. Figure 3-2 shows the locations of these future facilities. These facilities have completed project level CEQA review and need no further CEQA analysis.

### 3.4 PROPOSED PROJECT

As described above, the Harvest Water Program includes expanding the recycled water system to serve the South County, and consists of pumping Title 22 tertiary-treated, disinfected recycled water from the SRWTP through new pipelines to potential customers. The Lateral Pipelines and On-Farm Connections Project includes the installation of new distribution mains, service connection laterals, and appurtenant facilities, as shown in Table 3-1 and Figure 3-2.

**Table 3-1 Lateral Pipelines and On-Farm Connections Project Components**

Project Component	Location	Details
Distribution mains	County, City, and rural roads (public rights-of-way); private dirt roads; and other private lands	Approximately 185,000 feet (25 miles) of up to 42-inch diameter pipeline
Turnouts	At the interface between public rights-of-way and existing, private agricultural land; could connect to a standpipe or other existing irrigation system appurtenance	Pipe and metering equipment that connects directly into existing irrigation systems or discharge into a landowner's onsite water storage area via the service connection laterals
Service connection laterals	Private dirt roads and other private lands, public open space lands	Up to 12-inch diameter pipeline <sup>1</sup>

Note: <sup>1</sup> The length of pipeline will be determined upon identification of potential customers.

Source: Adapted from Table 2-2 in the Program EIR (Regional San 2017)

Approximately 25 miles of distribution mains would connect the transmission pipeline to the customer's service connection laterals, and their purpose would be to provide water to specific areas where potential customers are located. Distribution mains would range from 12 inches to 42 inches in diameter. Service connection laterals would provide water directly to individual customers. They would range in size from approximately 6 to 12 inches in diameter depending on individual customer demand.

Conceptual alignments for the distribution mains and turnouts (which would connect to service lateral connections) that would be located on public road ROW are shown in Figure 3-2; their exact alignments would be based on each customer's point of connection and this information has not yet been determined. A small portion of the distribution mains and most of the service connection laterals would be located on private dirt roads or agricultural lands and could cross irrigation ditches and utilities. These pipelines would be designed upon confirmation of customers to be served and points of connections to the customers. Approximately 60 service connections would be provided initially, but these could number up to 125 when the system is fully built out.

For the purposes of this evaluation, it is assumed that a turnout would be required at every irrigated parcel within the service area. Customer turnouts would consist of a dedicated customer service line to the property line and facilities such as flow meter, totalizing meter, and isolation valve, which all would be sized to accommodate the peak hour customer demand (see Figures 3-3 and 3-4).

The location of the turnout for each customer will be determined based on feedback from each individual customer. Typically, the turnouts would be located proximate to the customer's existing well or another appropriate connection to the irrigation system.

All turnouts/service connection laterals would require an air gap or other backflow protection for the recycled water system connection and any wells connected to the on-farm irrigation system.

### 3.4.1 Operations

The following discussion provides information for both the Lateral Pipelines and On-Farm Connections Project (the focus of this checklist analysis) and the overall Harvest Water Program. Although the total Harvest Water Program is not evaluated in this "scope of the EIR" checklist, information on the entire program is provided to assist in understanding the role of the Lateral Pipelines and On-Farm Connections Project in the overall program.

The average annual recycled water delivered to potential irrigation customers at full program implementation (including winter applications) and managed wetlands such as Stone Lakes would be up to 50,000 AFY.

The provision of recycled water to irrigation customers and for habitat benefits would result in a reduction in the discharge to the Sacramento River. Thus, Regional San would reduce discharge by up to 50,000 AFY at full program implementation. However, use of recycled water would benefit the groundwater basin, and higher groundwater levels would result in increased flows in the Cosumnes and Sacramento Rivers because less water would flow out of those rivers into the groundwater basin. Once the groundwater basin reaches equilibrium, the program is expected to increase streamflows by about 36,000 to 38,000 AFY with implementation of both summertime irrigation and wintertime application. With respect to the NWR, water would be delivered to the managed wetlands during low agricultural irrigation periods (spring and fall).

### 3.4.2 Maintenance

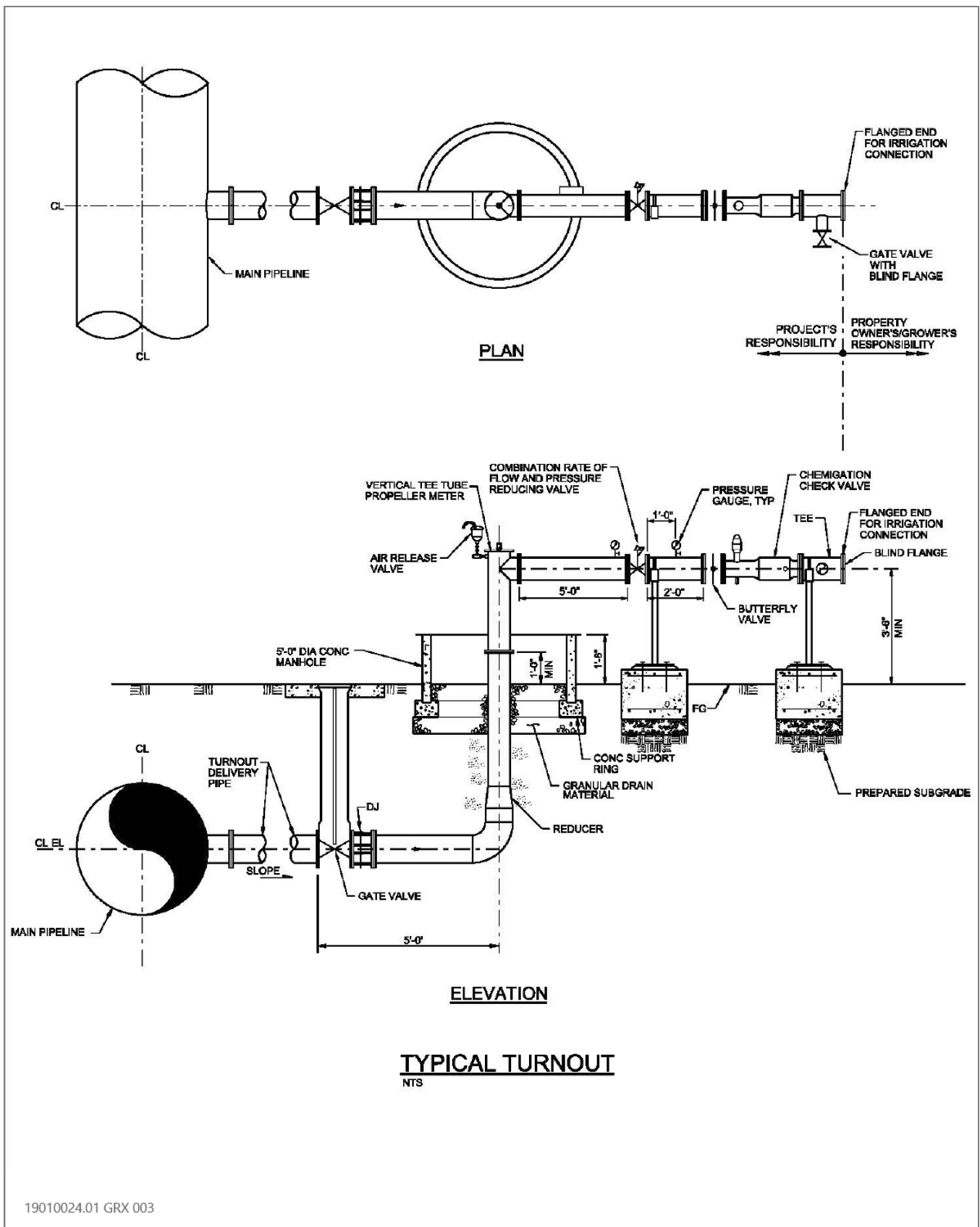
Maintenance would primarily involve regular visual inspections of all above ground facilities (estimated to be weekly), and physical inspection of the pipelines and appurtenances, which would occur on a regular basis (approximately annually, but to be determined based upon asset management program standards). Regional San operations and maintenance staff, or its representatives, would conduct maintenance activities.

## 3.5 PROJECT CONSTRUCTION

### 3.5.1 Construction Considerations

This section outlines the pipeline installation techniques under consideration for the project. The precise construction methods are yet to be determined but work is anticipated to follow the broad methods outlined in the following sections.

All pipeline construction would occur within public roadways or other public ROW, private dirt roads and agricultural lands, and public open space areas. An access agreement may be required for railroad crossings. Pipeline installation would be accomplished using open-cut construction, except at specific sensitive crossings (e.g., stream/river/sensitive biological resources, railroad crossings, canal/ditch, busy intersections, areas with dense utilities), where trenchless construction techniques could be employed. Specifically, trenchless construction (e.g., bore and jack, horizontal directional drilling [HDD]) would occur at I-5, if needed. If possible, the connection to lands west of I-5 would be made via undercrossing of I-5 and trenchless crossing would be avoided. If trenchless construction is required for crossing of I-5 construction pits would be located outside the California Department of Transportation (Caltrans) ROW.

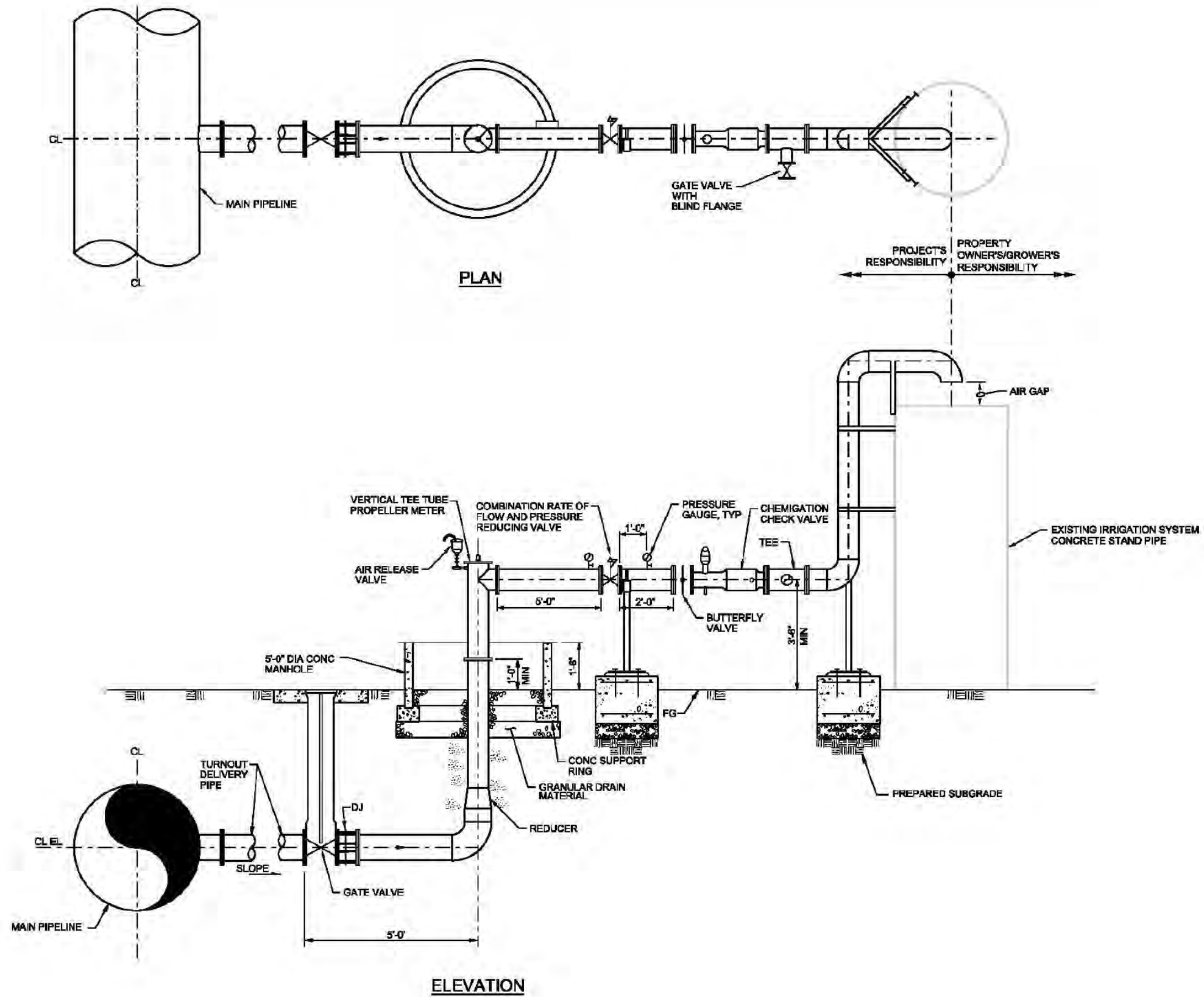


19010024.01 GRX 003

Source: RMC 2017

Figure 3-3 Typical Turnout - Pressure Connection





19010024.01 GRX 004

Source: RMC 2017

Figure 3-4 Typical Turnout - Air Gap

A total of approximately 25 miles of pipelines would be installed in public ROW with an assumed roughly 400 feet of daily pipeline advancement with either open-cut or trenchless construction. The construction phases for the advancement of the pipeline include site preparation/asphalt removal, trench excavation, pipeline installation/trench refilling, compaction, and asphalt repair.

A portion of spoil (soil and rock) excavated during construction would be reused on site for backfilling and a portion would be disposed of off-site following all applicable laws and regulations. Any material that would not be reused as backfill would be stabilized and stored temporarily at the construction staging area until characterized and then hauled away to a permitted disposal site (e.g., landfill). Potential for reuse of spoil from a trenchless installation would depend on the trenchless method selected because some methods remove spoil using slurry (i.e., the material is mixed with water or drilling fluid) and for those methods it is not practical to reuse excavated spoil.

### 3.5.2 Construction Timing

Construction of the Lateral Pipelines and On-Farm Connections Project is estimated to begin as early as 2022 and continue for approximately two years.

Construction would typically be limited to those hours consistent with the noise ordinance of the affected jurisdictions. Typical work hours would be Monday through Friday from 7:00 a.m. to 7:00 p.m. (construction noise is exempt from noise ordinances between 6 a.m. and 8 p.m. on weekdays within Sacramento County and the City of Elk Grove), and construction might take place during weekends and nighttime (e.g., for connection of new pipelines to existing pipelines in heavy traffic areas) if necessary, and if approved by the affected jurisdictions. The project construction contractor would be responsible for obtaining the necessary permits to conduct weekend and nighttime activities.

### 3.5.3 Staging Areas

Equipment, material, and vehicle staging would be accommodated at the SRWTP and along the proposed pipelines. Spoil would not be located within Caltrans ROW (along I-5).

### 3.5.4 Pipeline Construction

#### OPEN-CUT CONSTRUCTION

Open-cut construction (also referred to as open trench with shoring or cut-and-cover) is the proposed option for installing the majority of the pipeline along existing roadways and within private agricultural lands. Generally, the open-cut trench would be approximately 2 feet wider than the diameter of the pipe being installed and 6 feet deeper than the pipe diameter. With anticipated project pipe diameters ranging from 4 inches to 42 inches, trench widths would range from approximately 2.5 feet to 5.5 feet and depths would range from approximately 6.5 feet to 9.5 feet. Trench widths and depths may also vary in response to existing utility locations, pipe bedding requirements, and other factors. Shoring may be required to provide trench stability and to protect existing improvements.

Open-cut construction would involve saw-cutting and removing pavement in existing paved areas where needed. Asphalt would be cut using large saw blades mounted on a cart that would be pushed by a construction laborer. The asphalt would be lifted in large chunks and slabs from the cut area by a front-end loader or backhoe into a dump truck for off-hauling. The saw cutting operation would be relatively fast, with several hundred feet typically being cut within a few hours. Where possible, the pipelines would be installed under the shoulder of the roads to minimize paving and traffic disruption.

Installation of dewatering wells may be required before start of excavation depending on the soil type and groundwater level. Water pumped from the excavation area must be properly disposed to nearby storm and irrigation ditches or impoundments. Dewatering pumps could run continuously (24 hours per day) in the open trench areas while excavation is taking place, to maintain the groundwater level below the bottom of trench. After the

pipeline is installed and backfilled, the dewatering pumps would be removed and relocated to the next segment of pipeline construction.

Heavy equipment for excavation typically involves continuous use of an excavator to fill dump trucks, which would make intermittent trips to an off-site disposal area. Typically, two or more dump trucks would be used to allow continuous offloading from the excavator. In addition, dump trucks hauling imported material from off-site sources for pipeline bedding and backfill would make semi-continuous trips to the site as pipe is being installed. A tracked excavator would be used to lift pipe segments from a flat-bed delivery truck or the pipe string along the road and position the pipe in the trench. Temporary trench plates would be installed over the trench at the end of each workday. Final paving and marking typically would be done for the entire pipeline length after installation.

To accommodate construction equipment and work area, the entire construction corridor (active work area including the trench) would be 45 feet wide for pipelines up to 24 inches in diameter, and 60 feet wide for larger pipelines (30-inch to 42-inch). Because of the limited width of the existing roads and the size of the trench and construction zone, it is expected that the construction may require full road closures unless temporary access for construction equipment can be provided along the shoulders of the road and/or adjacent property. If access can be provided along the roadway shoulders and adjacent property, only partial road closures with appropriate traffic control would be required. Otherwise, segments of the affected roadway would be closed during pipeline installation activities. Traffic control operations would be publicly noticed at the location of the temporary traffic restrictions a week in advance of any road work that impedes the flow of traffic (i.e., closes the road, closes a traffic lane, or closes the road shoulder).

It is expected that open trench construction within paved roadways would proceed at the rate of approximately 150 feet per day. Excavated trench materials would be side cast within approved work areas and reused as appropriate for backfill. Excess material would be hauled off for disposal at an approved disposal site (e.g., landfill). Upon completion of pipeline installation, affected roadways would be repaved per the requirements of the affected jurisdiction.

Open-cut construction would also be used within private farmland areas. Some of the lands are fallowed while others are cultivated. Open-cut construction proposed for cultivated areas may require selective removal of the crop, depending on the crop and time of year. Temporary and permanent easements would be obtained from individual property owners and growers as needed, and coordinated to avoid the need to minimize removal of crops.

## TRENCHLESS PIPELINE CONSTRUCTION

Trenchless construction methods would be used for specific crossings. These methods are used to minimize the area of surface disruption required for pipeline installation or where open-cut construction is not practical or not allowed. The exact types of trenchless methods to be employed have not yet been defined, but could consist of HDD or jacking and boring (sometimes known as jack-and-bore construction).

### Horizontal Directional Drilling

HDD is a trenchless pipeline installation method that can be used for crossing major roadway intersections and waterways. HDD crossings are installed between an entry and exit area. HDD involves the use of a drill rig tilted at an angle, typically in the range of 8 to 12 degrees from horizontal. A small diameter (4- to 8-inch diameter) pilot hole is first drilled along a pre-determined horizontal and vertical alignment from the entry to exit area. This pilot hole can be guided using electromagnetic readings transmitted from the drill bit back to the drill rig. Excavation takes place by introducing pressurized slurry (a thin mixture of water and clay) through a drill string to the bit. The slurry pressure in combination with a rotating drill bit excavates the material, which is then transported back to the entry area with the exiting slurry along the outside of the drill string. In some cases, a larger diameter wash pipe may be rotated around the drill string to prevent sticking of the steerable string.

A slurry collection area is required at the entry and exit sides of each crossing. These areas are approximately 50 to 100 feet square by approximately 5 feet deep, and are used as the collection point for the fluid material removed during drilling, which is a mixture of the drilling slurry and spoil. This fluid is then pumped to a slurry separation plant to separate the spoil from the fluid so that the fluid can be reused. Once the pilot hole is complete, it is then enlarged

by pulling larger reamers from the pilot exit back towards the drilling rig. After one or more reaming passes, the pipeline is then pulled into place behind the last reamer.

The entry side requires a work area of approximately 1,500 to 3,000 square feet for the drill rig, slurry separation plant, material storage and other support equipment. The exit side requires a work area of about 1,000 to 1,500 square feet for the pullback. This area is exclusive of the area needed for the pipe assembly and laydown area. Typically, a corridor about 15 feet wide by the length of the pipe is needed for the buildup and laydown.

Pipes would be installed at varying depths depending on features being avoided, the existing underlying utilities, soil types, environmental constraints, entry and exit constraints, and bend radius of the installed product and drill pipe. Although the exact depths of the pits and drilling have not been defined as design has not yet been completed, for the purpose of this analysis, it is assumed that the depth of construction would vary from 20 to 40 feet under Franklin Boulevard and other roads, railroad, and canals.

### Jack and Bore Construction

Jack and bore is a method that is often used for pipeline crossings of major roadway intersections and railroads where crossings are generally less than 300 feet long and above the groundwater level. Jack and bore would require two pits that are excavated at each end of the pipeline to be installed. A boring machine is inserted into one pit to bore the soil using an auger to remove material, a casing is pushed forward as material is removed until it reaches the receiving pit, and the pipe is inserted in the casing. The jacking pit (i.e., entry point) is excavated (and shored) with typical dimensions of 8 to 12 feet wide and 45 to 50 feet long depending on the casing length selected. The depth would depend on the feature to be avoided, existing utilities, or separation requirements. The exact depths of the pits and drilling have not been defined because design has not yet been completed; however, for the purpose of this analysis, it is assumed that the depth of construction would be on the order of 15 to 20 feet deep for railroad and highway crossings. Jack and bore typically has very limited steering control and it is not the method of choice if precise line and grade control is required.

Shoring, appropriate to the pit depth, would be used to support the excavation. In addition, the back wall of the jacking pit would need to be constructed to withstand the reactive forces from the jacking frame. An additional area of about 1,500 to 2,000 square feet would be needed around the pit for temporary storage of pipe sections and for loading material removed from the bore. The receiving pit at the other end of the crossing would be smaller, encompassing approximately 100 square feet. Pits and work areas would be located within existing ROW and along streets, where appropriate. Crossings of roadways would typically take three weeks (with one week for mobilization, one week for installation, and one week for demobilization and backfill). After pipeline construction and installation is complete, the work area would be restored to preconstruction conditions.

## 3.5.5 Construction Equipment, Crew, Spoil, and Trip Generation

### CONSTRUCTION EQUIPMENT AND CREW SIZE

It is anticipated that two separate crews would each work simultaneously to install the pipelines. One crew would install pipelines in road ROW, implementing all four phases of construction (asphalt removal, trench excavation, pipe installation/trench refilling, and asphalt repair). The other crew would install smaller pipelines connecting landowners to the larger pipelines in the road ROW. These pipelines would generally not require asphalt removal or repair as installations would typically occur in agricultural land, and where pipeline alignments follow or cross private roads, these roads are primarily dirt, gravel, or rock. Each of the two crews would have approximately 12 construction workers.

For pipeline installation in road ROW, construction equipment would include a saw cutting machine, loaders, a skidsteer loader, a backhoe, large and small excavators, roller compactors (walk behind and riding), a water truck, a mobile soil-cement mixer, and an asphalt paver. Pipe sizes installed in the paved road ROW would vary, with the largest diameter pipe being 42 inches.

For pipeline installation connecting landowners to the larger pipelines, construction equipment would include a dozer, loaders, a chipper, backhoes, and a water truck. Similar to the pipes in public ROW, varying sizes of pipe would be installed in these areas, with the largest diameter pipe being 12 inches.

## CONSTRUCTION SPOIL AND TRIP GENERATION

The amount of spoil generated would depend on the construction methods selected. Table 3-2 shows estimated cubic yards (CY) of spoil from pipeline construction.

**Table 3-2 Spoil Generated by Pipeline Construction**

Construction Method	Spoil Quantity (CY)	Number of Truck Trips <sup>1</sup>
Open trench construction	198,000	12,375
Trenchless construction	21,000	1,315
<b>Total</b>	<b>219,000</b>	<b>13,690</b>

<sup>1</sup> It is assumed that each truck would have a hauling capacity of 16 cubic yards of spoil per truckload.

Notes: CY = cubic yards

Source: Data compiled by Ascent Environmental in 2020

As shown in Table 3-2, approximately 219,000 CY of spoil material would be generated from pipeline construction. The spoil would consist of material excavated from the pipeline trench and not re-used to cover the pipeline, and material taken out of the hole when using trenchless construction methods. Assuming a hauling truck capacity of 16 CY per truckload, up to 13,690 truck trips (round trips) total would be generated by spoil removal.

In addition to equipment and material delivery, a total of 36 worker trips (round trips) would be generated per day, assuming each individual drives separately and half of the workers travel for lunch.

### 3.5.6 Construction-Related Water Requirements

Water, from water trucks, would be used during construction activities for dust control purposes. Water generated from the trench dewatering operations may also be usable for dust control. Any excess water not used for dust control would be disposed of likely via land application, which would require construction easements and property owner approval.

### 3.5.7 Surface Restoration

Repaving of disturbed roadway areas would occur after pipeline installation and testing. New asphalt or concrete pavement would be placed to match the surrounding road type. For asphalt repaving, a temporary asphalt material may be installed to allow traffic to use the roadway immediately after pipeline construction with permanent repaving near completion of the project. A repaving crew would follow the installation crew and prepare the road surface for repaving. Final repaving to restore all disturbed roadways would be done after pipeline installation and testing is completed. In some cases, surface restoration may also include vegetation to return the site to its pre-construction condition.

## 4 COVERAGE UNDER THE PROGRAM EIR

To determine the project's coverage under the Harvest Water Program (formerly, South County Ag Program) EIR (Program EIR), pursuant to Section 15168(c) of the State CEQA Guidelines the following questions must be answered:

- ▶ Are the objectives of the project consistent with the objectives adopted for the Program EIR?
- ▶ Are the proposed facilities consistent with the infrastructure covered in the Program EIR?
- ▶ Are the proposed facilities consistent with the overall size and capacity of facilities described in the Program EIR?
- ▶ Are the proposed facilities within the geographic area analyzed in the Program EIR?
- ▶ Are the project activities within the scope of the environmental impact analysis in the Program EIR?

Sections 4.1 through 4.4 document the project's coverage by and consistency with the project objectives, infrastructure, overall size and capacity of facilities, and geographic area contained in the Program EIR. Section 4.5 contains a detailed examination of environmental topics documenting that the Lateral Pipelines and On-Farm Connections Project is within the scope of the environmental impact analysis in the Program EIR.

### 4.1 HARVEST WATER PROGRAM OBJECTIVES

The overall objective of the Harvest Water Program (formerly, the South County Ag Program) is to provide a reliable source of nonpotable water in the South County. Specifically, the objectives of the program, which are defined in Section 1.2 of the Program EIR, are as follows:

- ▶ Maximize use of recycled water.
- ▶ Reduce groundwater pumping in the Central Basin, and contribute to long-term basin sustainability by supplying recycled water to agricultural customers.
- ▶ Minimize conveyance costs (pipeline and pumping) while maximizing demand served.
- ▶ Improve environmental resources in the area by:
  - enhancing the riparian corridor along the Cosumnes River by raising groundwater levels,
  - reducing streamflow losses in the Cosumnes River during critical fall periods by raising groundwater levels,
  - providing drought-resistant water supplies to agricultural users to encourage long-term agricultural uses in the Cosumnes River area, and
  - providing a reliable water supply to managed wetlands.
- ▶ Assist in long-term fulfillment of the Water Forum Agreement for conjunctive use of surface water and groundwater supplies in the county.
- ▶ Work within the context of Sacramento Central Groundwater Authority's (SCGA's) developing Groundwater Accounting Program and with environmental organizations to balance potential recovery of groundwater with regional groundwater needs.
- ▶ Support the SCGA and environmental organizations in developing a groundwater accounting program that will balance the increase in groundwater supply with regional water reliability and environmental benefits.

The Lateral Pipelines and On-Farm Connections Project would support these program objectives as follows. The project involves the installation of distribution mains, service connection laterals, and customer turnouts. The distribution mains would convey water from the Sacramento Regional Wastewater Treatment Plant (SRWTP)—via a new pump station and transmission pipeline (which were both analyzed at a project-level in the Program EIR, but have not been constructed yet)—to proposed service connection laterals, which would provide water directly to

individual customers in south Sacramento County. The project would facilitate the delivery of up to 50,000 acre feet per year (AFY) of disinfected, tertiary-treated recycled water to approximately 16,000 acres of agricultural land, 400 acres of managed wetlands within the Stone Lakes National Wildlife Refuge, and a potential recharge area. Thus, consistent with the program objectives, the project would maximize the use of recycled water; reduce groundwater pumping in the Central Sacramento Groundwater Basin and contribute to long-term basin sustainability by supplying recycled water to agricultural customers that normally irrigate with groundwater; minimize conveyance costs (pipeline and pumping) while maximizing demand served; improve environmental resources in the area; and assist in long-term fulfillment of the Water Forum Agreement for conjunctive use of surface water and groundwater supplies in the county (see Section 1.1.1 of the Program EIR for a discussion of the Water Forum Agreement).

## 4.2 HARVEST WATER PROGRAM INFRASTRUCTURE

The Harvest Water Program includes expanding Regional San's recycled water system to serve the South County, and consists of pumping Title 22 tertiary-treated, disinfected recycled water from the SRWTP through new pipelines to potential customers. Proposed components of the Harvest Water Program, as described in the Program EIR, are shown in Table 4-1 as well as the level of environmental analysis included in the Program EIR.

**Table 4-1 Proposed Components of the Harvest Water Program (as identified in the Program EIR)**

Proposed Component	Location	Details	Level of Environmental Analysis in the Program EIR
Pump Station	SRWTP	1 pump station, 7,000 horsepower	Project Specific
Transmission Pipeline (from proposed Pump Station to Twin Cities Road)	County, City, and rural roads; on public rights-of-way	Approximately 72,800 feet (13.8 miles) of 18- to 60-inch-diameter pipeline	Project Specific
Distribution Mains	County, City, and rural roads (public rights-of-way), private dirt roads and other private lands	Approximately 185,000 feet (25 miles) of 12- to 30-inch-diameter pipeline	Programmatic
Service Connection Laterals	Private dirt roads and other private lands, public open space lands	6- to 12-inch diameter pipeline <sup>1</sup>	Programmatic
Turnouts	On existing private agricultural land	Pipe and metering equipment that connects directly into existing irrigation systems or discharge into a landowner's onsite water storage area	Programmatic
Potential Recharge Area	Private agricultural land	560 acres	Programmatic
Diluent Wells, if needed for recharge area	Private agricultural land	3 diluent wells within a 2,000- to 6,000-foot-radius of the potential recharge area	Programmatic
Stone Lakes Managed Wetland	Stone Lakes National Wildlife Refuge	Provision of water to South Stone Lakes wetlands	Programmatic
Wintertime Application	Private agricultural land	Up to 16,000 acres	Programmatic

<sup>1</sup> The length of pipeline will be determined upon identification of potential customers.

Source: Table 2-2 in the Program EIR (Regional San 2017)

Of the program components shown in Table 4-1, the Lateral Pipelines and On-Farm Connections Project includes the distribution mains, service connection laterals, and turnouts. The project's proposed infrastructure was expressly identified as part of the Harvest Water Program and is, therefore, consistent with the infrastructure covered in the Program EIR.

### 4.3 HARVEST WATER PROGRAM OVERALL SIZE AND CAPACITY OF FACILITIES

The proposed size and capacity of the Harvest Water Program facilities as expressed in the Program EIR are shown in Table 4-1. Since preparation of the Program EIR, the project design has progressed and more precise details about the proposed size and capacity of facilities have become available. Consistent with what is described in the Program EIR, a total of approximately 25 miles of distribution mains would be installed, primarily in public rights-of-way (ROW) and private roads, as part of the Lateral Pipelines and On-Farm Connections Project. The proposed size and capacity of pipelines would be similar to, although slightly larger, than what was described in the Program EIR, with distribution mains up to 42 inches in diameter (a range of 12 to 30 inches was identified in the Program EIR) and service connection laterals up to 12 inches in diameter (a range of 6 to 12 inches was identified in the Program EIR). While the diameter of the distribution lines may be slightly larger, the construction methods and trenching would be substantially the same as considered in the Program EIR. Therefore, the project's proposed facilities are generally consistent with the overall size and capacity of facilities described in the Program EIR.

### 4.4 HARVEST WATER PROGRAM GEOGRAPHIC AREA

The Harvest Water Program would be located within Sacramento County, including within portions of the City of Elk Grove, unincorporated Sacramento County, and portions of the Stone Lakes National Wildlife Refuge managed by the U.S. Fish and Wildlife Service, as described in the Program EIR and shown in Figure 3-1. The new pump station would be located within the SRWTP site. Transmission pipelines and distribution mains would be located on County and city streets and rural roads, primarily within public road ROW, although distribution mains and service laterals may also occur on private agricultural lands. The potential recharge area, diluent wells, and service connection laterals would generally be located on private agricultural lands or private roads. Recycled water would be delivered to farms, wetlands, and, potentially, a recharge area, all of which are currently outside Regional San's service area.

The approximate boundaries for the Lateral Pipelines and On-Farm Connections Project are Interstate 5 (I-5) to the west, Highway 99 to the east, Bilby Road to the north, and the Cosumnes River Preserve to the south (Figure 3-2). A portion of the project area is located west of I-5 composed of the Stone Lakes National Wildlife Refuge and lands between the refuge and I-5. The project area is shown on maps contained in the Program EIR, and its proposed location has not substantially changed, other than extending approximately 2,000 feet south of Twin Cities Road in some areas to the boundary of the Cosumnes River Preserve. This extended area contains agricultural land consistent with the remainder of the proposed delivery area and is not a substantial change to the proposed delivery area. Also, as the project is designed and individual customers are identified, placement of pipeline alignments will continue to be refined. Therefore, the project's proposed facilities are within the geographic area analyzed in the Program EIR.



## 4.5 ENVIRONMENTAL REVIEW OF PROJECT ACTIVITIES

The Program EIR comprehensively addressed the potential environmental effects of implementation of the Harvest Water Program. The following environmental resources, if checked below, would be potentially affected by this project and would involve at least one impact that exceeds or is otherwise outside the scope of activities evaluated for potential environmental effects in the Program EIR.

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Aesthetics                    | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources          | <input type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Energy                             |
| <input type="checkbox"/> Geology/Soils                 | <input type="checkbox"/> Greenhouse Gas Emissions           | <input type="checkbox"/> Hazards and Hazardous Materials    |
| <input type="checkbox"/> Hydrology and Water Quality   | <input type="checkbox"/> Land Use and Planning              | <input type="checkbox"/> Mineral Resources                  |
| <input type="checkbox"/> Noise                         | <input type="checkbox"/> Population and Housing             | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Recreation                    | <input type="checkbox"/> Transportation                     | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire                           | <input type="checkbox"/> Mandatory Findings of Significance |
| <input checked="" type="checkbox"/> None               |   |   |

Regional San has defined the column headings in this Initial Study Checklist as follows:

Impact Examined in Program EIR: This column is checked where the potential impacts of the project were examined in the Program EIR, and mitigation measures identified in the EIR will mitigate any impacts of the project to the extent feasible. All applicable Program EIR mitigation measures are incorporated into the project as proposed. This document summarizes and cross references the relevant analysis in the Program EIR.

Impact Not Examined in Program EIR, No Impact: This column is checked where the potential effects of the project were not examined in the Program EIR, but the potential effects of the project would not result in any impact in the category or the category does not apply. "No impact" answers need to be adequately supported by the information sources cited or should note that the impact does not apply to projects like the one involved (e.g., the project is outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on project-specific screening analysis).

Impact Not Examined in Program EIR, Less-than-Significant Impact: This column is checked where the potential effects of the project were not examined in the Program EIR, but implementing the project would result in a less-than-significant effect. The project impact would be less than significant without incorporation of the Harvest Water Program or project-level mitigation.

Impact Not Examined in Program EIR, Additional CEQA Analysis Required: This column is checked for impact categories that were not examined in the Program EIR or that have been examined in this Initial Study Checklist and for which a new potentially significant effect would result. Additional CEQA documentation beyond this checklist would be necessary to further address the issue.

### 4.5.1 Aesthetics

Section 3.1, "Aesthetics," of the Program EIR evaluates the impacts of the program on visual resources. It presents environmental setting information, the regulatory framework, the analysis methodology, thresholds of significance, and a detailed environmental impact evaluation.

Aesthetics	Impact Examined in Program EIR	Impact Not Examined in Program EIR		
		No Impact	Less-than-Significant Impact	Additional CEQA Analysis Required
Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a,b,c) The Program EIR determined that the program elements would not substantially alter existing viewsheds or degrade the existing visual character or quality of the program area. This impact was concluded to be less than significant (Program EIR Impact AES-1). The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR, and in the same geographic area. The project site and its surroundings do not offer expansive views or high value landscape, although the openness of the terrain and fields of row crops offer scenic value. The project would not alter a scenic vista.

As explained in Section 3.1.2, "Regulatory Setting," of the Program EIR, Route 160 within Sacramento County is considered an officially designated state scenic highway; however, Route 160 is not visible from the project site. Within proximity to the project site, I-5 and Highway 99 are both designated protected scenic corridors by the Sacramento County General Plan. Some portions of project construction could be visible from I-5 and Highway 99; however, the project would not damage scenic resources within these corridors because project construction would be geographically dispersed and temporary.

Consistent with what is described in the Program EIR, the proposed distribution mains would be located primarily within public roadways or other public ROW, private roads and agricultural lands, and public open space areas. Consistent with the Landowner Checklist provided in Appendix C, on-farm connection pipelines would be placed in private roads, agricultural lands, and open space areas where sensitive biological resources are not present. Pipeline construction activities could potentially affect scenic resources within the viewshed and could degrade the site/surrounding's visual quality due to excavation activities, and the presence of construction equipment/materials and fencing around work areas. Existing residences located along the pipeline alignment and motorists using the affected or adjacent roadways would have foreground views of construction activities, vehicles, equipment, and materials. Motorists typically would have fleeting

views of pipeline construction activities due to the speed of travel with slightly longer views when there is a momentary stoppage in traffic. For residences situated along the alignment, views of construction activities would generally be of short duration due to the nature of construction. Disturbed areas would be restored to pre-construction conditions as part of the project. The proposed pipelines would be installed underground and, therefore, would not be visible once construction is complete. Because all proposed pipelines would be located underground and would not be visible to the public, the proposed pipelines would not degrade the visual quality of the project site or surroundings.

- d) The Program EIR determined that the program elements would introduce new sources of light and glare associated with nighttime construction; this impact was concluded to be less than significant with mitigation (Program EIR Impact AES-2). The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR, and in the same geographic area.

Consistent with what is described in the Program EIR, the project would be located in a primarily agricultural area characterized by orchards, fields of row crops, and scattered rural residences and farm structures (e.g., barns). Existing lighting is minimal. If nighttime construction is required, temporary views of nighttime lighting associated with construction of the proposed pipelines could be a nuisance to adjacent residences and a potential hazard to motorists traveling on the affected roadways. In compliance with Mitigation Measure AES-2, the construction contractor would be required to shield and orient nighttime construction lighting downward. Once constructed, recycled water pipelines would be underground and would, therefore, not result in a new source of substantial light or glare. The mitigation measure will be incorporated into the project (see Chapter 5, "Applicable Mitigation Measures from the Program EIR").

## CONCLUSION

The project does not deviate from the building intensity, geographic area, or covered infrastructure described and analyzed in the Program EIR. The analysis herein does not identify any new or substantially more severe environmental impacts compared to the analysis in the Program EIR. Consequently, environmental effects of the project related to aesthetics are within the scope of the Program EIR and the project would not result in any effects that were not examined in the Program EIR. No new environmental document is required.

### 4.5.2 Agriculture and Forestry Resources

Section 3.2, "Land Use and Agriculture," of the Program EIR evaluates the impacts of the program on land use and agriculture. It presents environmental setting information, the regulatory framework, the analysis methodology, thresholds of significance, and a detailed environmental impact evaluation.

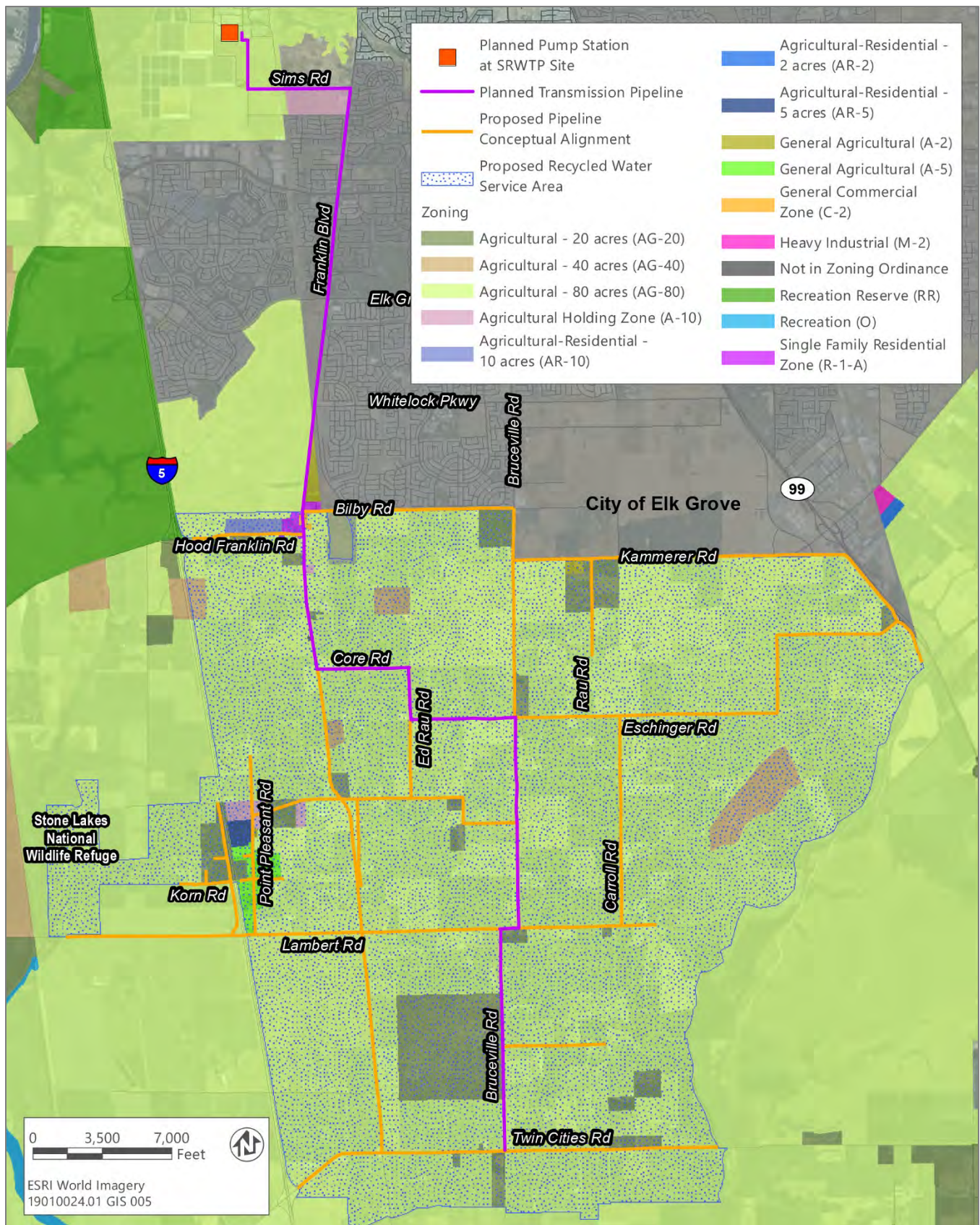
The following analysis pertains to agriculture and forestry resources. Land use is addressed in Section 4.5.11, "Land Use and Planning," in this Initial Study Checklist.

Agriculture and Forestry Resources	Impact Examined in Program EIR	Impact Not Examined in Program EIR		
		No Impact	Less-than-Significant Impact	Additional CEQA Analysis Required
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Consistent with what is described in the Program EIR, the project would be located in a primarily agricultural area characterized by orchards, fields of row crops, and scattered rural residences and farm structures (e.g., barns). The project area is relatively flat due to active farming and agricultural operations. The Cosumnes River borders the project area to the southeast.

The project site does not include forest or timberland uses, nor is it zoned for these resource types. As shown in Figure 4-1, the project site is zoned for the following uses: Agricultural (AG-20, AG-40, AG-80); Agricultural Holding Zone (A-10); Agricultural-Residential (AR-5); General Agricultural (A-2, A-5); Single Family Residential Zone (R-1-A); General Commercial Zone (C-2). These zoning designations do not include provisions for forest land or timberland.

- a, b) The Program EIR determined that the program elements would result in construction-related effects to agricultural lands, including those designated as Important Farmland and lands under Williamson Act contracts; this impact was concluded to be less than significant with mitigation (Program EIR Impact LUA-2). The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR, and in the same geographic area.



Source: Data downloaded from Sacramento County in 2017

Figure 4-1 Zoning

As described in Chapter 3, "Project Description," the majority of the proposed pipelines would be installed using open-cut construction methods, with trenchless pipeline construction for specific sensitive crossings (e.g., stream/river/sensitive biological resources, railroad crossings, canal/ditch, busy intersections, areas with dense utilities), where trenchless construction techniques could be employed. The proposed pipelines and appurtenances would be located primarily along County and rural roads, within public ROWs. However, as shown in Figures 4-2 and 4-3, there are areas where the proposed pipelines would traverse and/or be adjacent to Important Farmland as well as lands under Williamson Act contracts.

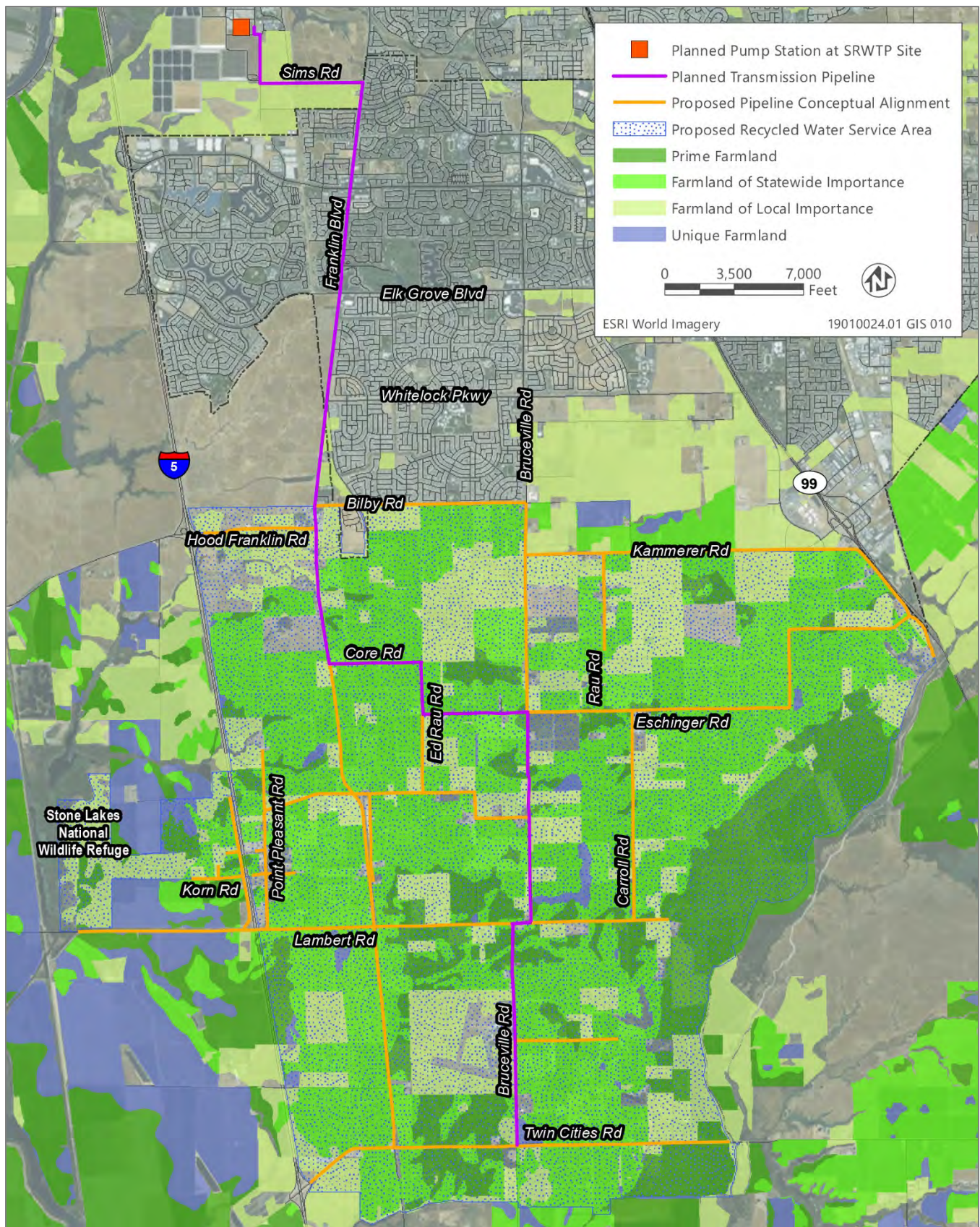
Construction associated with the proposed pipelines could encroach upon adjacent private lands, including agriculture areas (e.g., due to the limited width of the existing roads, or to avoid utilities or traffic). In areas where the construction corridor would be located within agricultural lands, agriculture (on Important Farmlands / lands under a Williamson Contract) would be temporarily precluded for some portion of the 4-year construction period. Construction in agricultural fields may require the focused removal of crops, depending on the crop and time of year. Construction could also potentially affect small areas of land adjacent to the road ROW, however this would be temporary (i.e., would not permanently remove agricultural lands from production). Upon completion of construction, the area would be restored to pre-construction conditions, and no permanent above ground facilities, other than at the direct connection to existing irrigation systems, would be located within the affected agricultural areas.

Construction outside of paved areas would involve the removal of topsoil to dig the pipeline trench. Heavy equipment (e.g., excavator, dump truck, flat-bed truck, front-end loader) would be used to dig trenches, transport pipe, and off-load excavated materials. The removal of topsoil and use of heavy equipment would have the potential to adversely affect long-term soil characteristics and productivity of this land (i.e., through compaction/removal of topsoil), causing such areas to no longer be viable for agricultural production. In compliance with Mitigation Measure LUA-2, Regional San and/or the construction contractor would be required to stockpile and replace topsoil. The mitigation measure will be incorporated into the project (see Chapter 5, "Applicable Mitigation Measures from the Program EIR").

Over the long-term, agricultural land use in this area would be unaffected as a result of the installation of the proposed pipelines. The proposed pipelines would be buried underground, installed up to 10 feet deep, and soil (including topsoil as required under Mitigation Measure LUA-2) would be backfilled over the trench such that farming would be able to resume following construction. The proposed pipelines would need to be inspected and maintained periodically after construction (for which permanent easements would be acquired as necessary). Inspections would be conducted through the utility access manholes installed during construction. Maintenance would consist of monthly inspections of the pipelines. The inspections and maintenance activities would generally be isolated and confined to the manholes and immediate vicinity of the pipeline alignment and, thus, would not be expected to disturb agricultural operations.

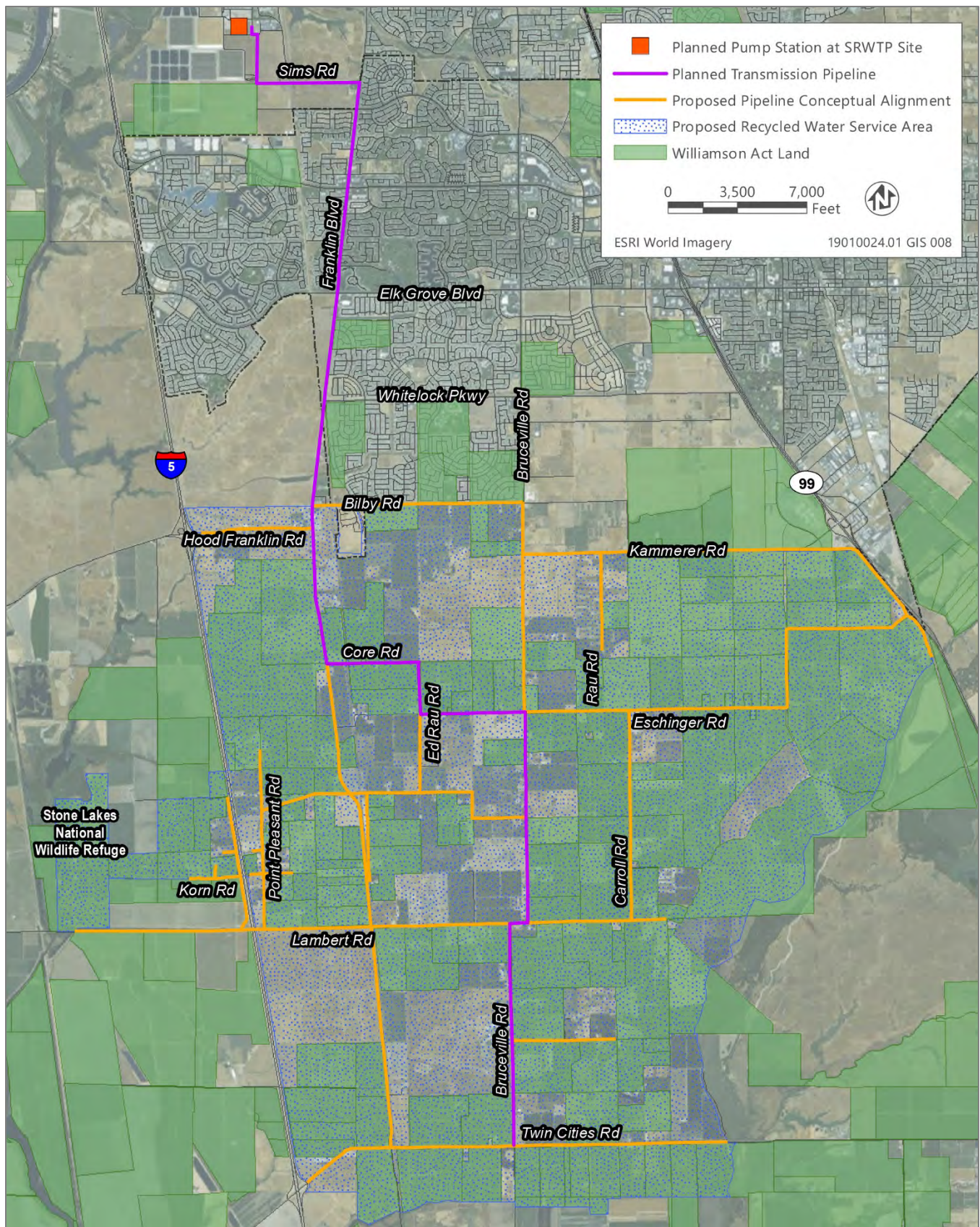
The project would provide a benefit to agricultural lands in the project area, including those designated as Important Farmland and Williamson Act lands by providing a sustainable water supply that may be available even during droughts, when other groundwater supplies may be limited.

- c,d) As shown in Figure 4-1, the project site is zoned for the following uses: Agricultural (AG-20, AG-40, AG-80); Agricultural Holding Zone (A-10); Agricultural-Residential (AR-5); General Agricultural (A-2, A-5); Single Family Residential Zone (R-1-A); General Commercial Zone (C-2). These zoning designations do not include provisions for forest land or timberland. Given the fact that the project site is not zoned for these resource types, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. Further, the project would have no impact resulting from the loss of forest land or conversion of forest land to non-forest use.



Source: Data downloaded from the Department of Conservation in 2020 for the year 2018

Figure 4-2 Important Farmland



Source: Data downloaded from Sacramento County in 2018

Figure 4-3 Williamson Act Land



- e) As described in item a,b), above, the proposed pipelines would traverse and/or be adjacent to Important Farmland as well as lands under Williamson Act contracts; however, the project would not involve any changes that could result in conversion of farmland to non-agricultural use.

As described in item c,d), above, the project site does not include forest or timberland uses. Thus, the project would not involve any changes that could result in conversion of forest land to non-forest use.

## CONCLUSION

The project does not deviate from the building intensity, geographic area, or covered infrastructure described and analyzed in the Program EIR. The analysis herein does not identify any new or substantially more severe environmental impacts compared to the analysis in the Program EIR. Consequently, environmental effects of the project related to agriculture and forestry resources are within the scope of the Program EIR and the project would not result in any effects that were not examined in the Program EIR. No new environmental document is required.

### 4.5.3 Air Quality

Section 3.4, "Air Quality and Greenhouse Gas Emissions," of the Program EIR evaluates the impacts of the program on air quality and GHG emissions. It presents environmental setting information, the regulatory framework, the analysis methodology, thresholds of significance, and a detailed environmental impact evaluation.

The following analysis pertains to air quality. GHG emissions are addressed in Section 4.5.8, "Greenhouse Gas Emissions," in this Initial Study Checklist.

To supplement the analysis in the Program EIR, the *Air Quality and Greenhouse Gas Technical Report for the Lateral Pipelines and On-Farm Connections Project* (Air Quality and GHG Technical Report) (Regional San 2020a) was prepared to identify and analyze the potential air quality and GHG impacts associated with the project. This report is included as Appendix A.

Air Quality	Impact Examined in Program EIR	Impact Not Examined in Program EIR		
		No Impact	Less-than-Significant Impact	Additional CEQA Analysis Required
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) The Program EIR determined that the program elements would not exceed any applicable thresholds for criteria air pollutants and precursors or conflict with or obstruct implementation of the applicable air quality plan; these impacts were concluded to be less than significant (Program EIR Impacts AQ-1, AQ-3, and AQ-5). The project is within the scope of the Program EIR because it would comply with Sacramento Metropolitan Air Quality Management District (SMAQMD) regulations, would not obstruct implementation of an applicable air quality plan, and would not result in any effects that were not examined in the Program EIR.

Consistent with what is described in the Program EIR, construction activities such as excavation, trenching, and vehicle exhaust would generate fugitive dust (respirable particulate matter with aerodynamic diameter of 10 micrometers or less [PM<sub>10</sub>] and fine particulate matter with aerodynamic diameter of 2.5 micrometers or less [PM<sub>2.5</sub>]). SMAQMD requires that all construction projects (regardless of size) implement Basic Construction Emission Control Practices, as required by District Rule 403.

The Air Quality and GHG Technical Report (Appendix A) concludes that because the project's construction phase emissions would be below SMAQMD's thresholds, the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. In addition, because the project would not modify land uses, the project would be consistent with SMAQMD's Air Quality Management Plan (AQMP). Furthermore, the long-term operation of the project would not generate criteria air pollutants that would exceed the SMAQMD significance thresholds, which were developed to determine whether a project would cumulatively contribute to the Sacramento Valley Air Basin nonattainment

designations. The project would not conflict with applicable air quality plans and would not cause any additional or worse impacts as compared to those identified in the Program EIR.

- b) The Program EIR determined that the program elements would not result in a cumulatively considerable contribution to a significant air quality impact; this impact was concluded to be less than significant (Program EIR Impact AQ-6). The project is within the scope of the Program EIR because it would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment and would not result in any effects that were not examined in the Program EIR.

Consistent with what is described in the Program EIR, construction would result in emissions of criteria air pollutants (e.g., PM<sub>10</sub> and PM<sub>2.5</sub>) and precursors (e.g., oxides of nitrogen and reactive organic gases) in the City of Elk Grove and Sacramento County, within the jurisdiction of the SMAQMD. Sacramento County is currently in nonattainment for ozone under California ambient air quality standards (CAAQS) and national ambient air quality standards (NAAQS), PM<sub>10</sub> for CAAQS, and PM<sub>2.5</sub> under NAAQS.

As discussed in the Air Quality and GHG Technical Report, the project would be consistent with and would support regional land use plans, and emissions associated with project construction are accounted for in SMAQMD's AQMP. Further, project-related construction emissions would not exceed the applicable mass emission thresholds for any of the criteria air pollutants or precursors established by SMAQMD that would interfere with the region's health-based standards. Therefore, the short-term contribution of criteria air pollutants and precursors from project construction, combined with other cumulative sources of ozone precursors in the region would not be cumulatively considerable and would not contribute to adverse health impacts (see Appendix A).

- c) The Program EIR determined that the program elements would not expose sensitive receptors to substantial pollutant concentrations; this impact was concluded to be less than significant (Program EIR Impact AQ-2). The project is within the scope of the Program EIR because it would not expose sensitive receptors to substantial pollutant concentrations and would not result in any effects that were not examined in the Program EIR.

Exposure levels of diesel PM from the installation of the project pipelines, have not changed since the certification of the Program EIR. The sensitive receptors closest to the project area consist of residences located along Franklin Boulevard, between Hood Franklin Road and Big Horn Boulevard.

As discussed in the Air Quality and GHG Technical Report, receptors are anticipated to be as close as 30 feet in some areas where pipeline is expected to be installed underneath roadways. However, because of the temporary construction activities and construction of approximately 200 feet of pipeline per day for each of two separate construction crews, exposure of any particular sensitive receptor would be brief (i.e., days) and would not be expected to cause an incremental increase in cancer risk greater than 10 in 1 million or a hazard index greater than 1.0 (see Appendix A).

- d) The Program EIR determined that the program elements would not create permanent or long-term objectionable odors; this impact was concluded to be less than significant (Program EIR Impact AQ-4). The project is within the scope of the Program EIR because construction and operation of the project would be consistent with what was analyzed in the Program EIR and the project would not lead to odor impacts beyond those assessed in the Program EIR.

Consistent with what is described in the Program EIR, construction activities would not generate permanent or long-term objectionable odors. Odors associated with the intermittent operation of diesel-powered equipment during construction may be detected by nearby sensitive receptors, but these odors would be of short duration and would not affect a substantial number of people.

As discussed in the Air Quality and GHG Technical Report, the project's minor odors from the use of heavy-duty diesel equipment and laying asphalt during project-related construction activities would be intermittent and temporary. As the transmission pipeline construction is estimated to advance approximately 200 feet per day for each of two separate construction crews, construction activity would only be in the vicinity of

sensitive receptors for short periods (i.e., days). In addition, emissions from the source would dissipate rapidly with an increase in distance. Sensitive receptors in proximity to the project site are as close as 30 feet, but exposure would be brief and intermittent (see Appendix A). As indicated in the Program EIR, odor exposure from the asphalt off-gases post installation would be undetectable to the surrounding sensitive receptors after less than one week. As evaluated in the Program EIR, the operations and maintenance of the pipeline were determined not to be a substantial odor source.

## CONCLUSION

The project does not deviate from the building intensity, geographic area, or covered infrastructure described and analyzed in the Program EIR. The analysis herein does not identify any new or substantially more severe environmental impacts compared to the analysis in the Program EIR. Consequently, environmental effects of the project related to air quality are within the scope of the Program EIR and the project would not result in any effects that were not examined in the Program EIR. No new environmental document is required.

### 4.5.4 Biological Resources

Section 3.5, "Biological Resources," of the Program EIR evaluates the impacts of the program on biological resources. It presents environmental setting information, the regulatory framework, the analysis methodology, thresholds of significance, and a detailed environmental impact evaluation.

To supplement the analysis in the Program EIR, the *Biological Resources Technical Report for the Lateral Pipelines and On-Farm Connections Project* (Biological Resources Technical Report) (Regional San 2020b) was prepared to describe the existing biological resources within and adjacent to the project footprint and assess the potential for special-status species and other sensitive biological resources to be affected by project activities. This report is included as Appendix B.

Biological Resources	Impact Examined in Program EIR	Impact Not Examined in Program EIR		
		No Impact	Less-than-Significant Impact	Additional CEQA Analysis Required
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) The Program EIR determined that the program elements could adversely affect sensitive species and their habitat; this impact was concluded to be less than significant with mitigation (Program EIR Impact BIO-1). The project is within the scope of the Program EIR because the types and intensity of potential impacts to

special-status species and sensitive habitats would be the same as those addressed in the Program EIR and mitigation would be implemented to avoid and compensate for any impacts to special-status species or sensitive habitats.

Consistent with what is described in the Program EIR, project construction activities could kill or injure special-status species, particularly during ground-disturbing activities such as excavation. Construction equipment and storage/moving of construction materials could affect sensitive species, and habitat for sensitive species could be adversely affected by construction, which could indirectly affect sensitive species.

A total of 15 special-status plant species and 22 special-status wildlife species have potential to occur in or near the project area. In compliance with Mitigation Measures BIO-1a through BIO-1d, special-status species and habitats would be avoided, and compensation would occur for any unavoidable effects. These mitigation measures will be incorporated into the project (see Chapter 5, "Applicable Mitigation Measures from the Program EIR").

- b) The Program EIR determined that the program elements could adversely affect riparian habitat or other sensitive natural community; this impact was concluded to be less than significant with mitigation (Program EIR Impact BIO-2). The project is within the scope of the Program EIR impact analysis because the types and intensity of potential impacts to sensitive natural communities would be the same as those addressed in the Program EIR and mitigation would be implemented to avoid and compensate for any impacts.

Consistent with what is described in the Program EIR, project construction activities could have a substantial adverse effect on riparian habitat or other sensitive natural communities. Use of equipment and excavation during construction could affect sensitive natural communities.

As discussed in the Biological Resources Technical Report (Appendix B), sensitive natural communities within the project area include Fremont cottonwood woodland, black willow thicket, valley oak woodland, California rose briar patch, and hardstem and California bulrush marsh. In compliance with Mitigation Measures BIO-1a, BIO-1b, and BIO-2, sensitive natural communities would be avoided, compensation would occur for any unavoidable effects, and permits for work in riparian or other sensitive areas would be obtained prior to construction. These mitigation measures will be incorporated into the project (see Chapter 5, "Applicable Mitigation Measures from the Program EIR").

- c) The Program EIR determined that the program elements could adversely affect federally protected wetlands; this impact was concluded to be less than significant with mitigation (Program EIR Impact BIO-3). The project is within the scope of the Program EIR because the types and intensity of potential impacts to protected wetlands would be the same as those addressed in the Program EIR and mitigation would be implemented to avoid and compensate for any impacts.

Consistent with what is described in the Program EIR, project construction activities could have a substantial adverse effect on federally protected wetlands. Ground disturbance during construction could result in temporary fill of or indirect water quality effects to federally protected wetlands.

As discussed in the Biological Resources Technical Report (Appendix B), drainages, vernal pools, and freshwater marsh including hardstem and California bulrush marsh are within the project area. These sensitive habitats could be considered protected wetlands. In compliance with Mitigation Measures BIO-1a, BIO-1b, BIO-2, and BIO-3, wetlands would be avoided, when possible, compensation would occur for any unavoidable effects, and permits/approvals under Sections 404 and 401 of the Clean Water Act would be obtained prior to construction. These mitigation measures will be incorporated into the project (see Chapter 5, "Applicable Mitigation Measures from the Program EIR").

- d) The Program EIR determined that the program elements could interfere with the movement of native resident or migratory fish or wildlife species; these impacts were concluded to be less than significant (Program EIR Impact BIO-4a) and less than significant with mitigation (Program EIR Impact BIO-4b). The project is within the scope of the Program EIR because the types and intensity of potential impacts to

migratory corridors would be the same as those addressed in the Program EIR and mitigation would be implemented to avoid and compensate for potential impacts.

Consistent with what is described in the Program EIR, project construction and operation activities could interfere with the movement of native resident or migratory fish or wildlife species. While the drainage corridors within the project area are highly degraded and likely function poorly as migratory corridors, direct impacts to drainage corridors could occur during construction (Program EIR Impact BIO-4a). In addition, the project has the potential to reduce flows in the Sacramento River, which could affect movement or reproduction of sensitive or important fish species in the Sacramento River (Program EIR Impact BIO-4b).

As discussed in the Biological Resources Technical Report (Appendix B), a constructed drainage occurs at the toe of the railroad berm adjacent to Franklin Boulevard within the project area. However, this drainage corridor is not a high-quality migratory corridor and the drainage would only be affected during construction. Therefore, the project's effects on use of drainages as migratory corridors would be consistent with the type and extent of impacts examined in the Program EIR.

The project's provision of recycled water to irrigation customers and for recharge would result in a reduction in the discharge to Sacramento River. Thus, Regional San would reduce discharge by up to 50,000 AFY at full program implementation. However, use of recycled water would benefit the groundwater basin, and higher groundwater levels would result in increased flows in the Cosumnes and Sacramento Rivers because less water would flow out of those rivers into the groundwater basin. Once the groundwater basin reaches equilibrium, the program is expected to increase streamflows by about 36,000 to 38,000 AFY with implementation of wintertime application. In compliance with Mitigation Measure HYD-4, operations would be coordinated with relevant resource agencies to minimize potential thermal impacts to the Sacramento River downstream of Lake Shasta during critically dry years. The mitigation measure will be incorporated into the project (see Chapter 5, "Applicable Mitigation Measures from the Program EIR").

- e) The Program EIR determined that the program elements could conflict with local policies and ordinances protecting biological resources; this impact was concluded to be less than significant with mitigation (Program EIR Impact BIO-5). The project is within the scope of the Program EIR impact analysis because the types and intensity of potential impacts to biological resources protected by policies and ordinances would be the same as those addressed in the Program EIR and mitigation would be implemented to avoid and compensate for any impacts.

Consistent with what is described in the Program EIR, project construction activities could conflict with local policies and ordinances protecting biological resources. The Sacramento County General Plan, Bufferlands Master Plan, and City of Elk Grove General Plan have policies regarding habitat and species preservation, and any tree removal would be subject to the Sacramento County Tree Preservation Ordinance.

As discussed in the Biological Resources Technical Report (Appendix B), drainages, wetlands, special-status species, and sensitive habitats are within the project area. In compliance with Mitigation Measures BIO-1a through BIO-1d and BIO-2, special-status species and sensitive habitats would be avoided, when possible, compensation would occur for any unavoidable effects, and permits/approvals would be obtained prior to construction. The mitigation measures will be incorporated into the project (see Chapter 5, "Applicable Mitigation Measures from the Program EIR"). The project would not include tree removal that would require implementation of Mitigation Measure BIO-5 (Comply with Sacramento County Tree Preservation Ordinance).

- f) The Program EIR determined that the program elements would not conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan because there was no such adopted plan at the time the Program EIR was prepared; it was thus concluded that there would be no impact (Program EIR Impact BIO-6). Since certification of the Program EIR, the South Sacramento Habitat Conservation Plan (SSHCP) has been adopted.

As discussed in the Biological Resources Technical Report (Appendix B), Regional San is a Participating Special Entity in the SSHCP, and the project is a SSHCP-covered activity. The project is within the scope of the Program EIR because the project is a covered activity under the SSHCP, and would comply with terms and conditions of the SSHCP to gain regulatory permits and approvals, and would not result in any effects that were not examined in the Program EIR.

## CONCLUSION

The project does not deviate from the building intensity, geographic area, or covered infrastructure described and analyzed in the Program EIR. The analysis herein does not identify any new or substantially more severe environmental impacts compared to the analysis in the Program EIR. Consequently, environmental effects of the project related to biological resources are within the scope of the Program EIR and the project would not result in any effects that were not examined in the Program EIR. No new environmental document is required.



### 4.5.5 Cultural Resources

Section 3.6, "Cultural Resources," of the Program EIR evaluates the impacts of the program on cultural resources. It presents environmental setting information, the regulatory framework, the analysis methodology, thresholds of significance, and a detailed environmental impact evaluation.

To supplement the analysis in the Program EIR with site-specific information, the *Sacramento Regional County Sanitation District Recycled Water Distribution Mains, Lateral Pipelines, and On-Farm Connections Project, CEQA Cultural Resources Survey Report* (Cultural Survey Report) (Regional San 2020c) was prepared to identify cultural resources within the project area, evaluate these resources to determine whether they are historical resources or unique archaeological resources, determine whether the project would affect these resources, and recommend procedures for avoidance. Due to its confidential nature, this report is not appended to this document.

Cultural Resources	Impact Examined in Program EIR	Impact Not Examined in Program EIR		
		No Impact	Less-than-Significant Impact	Additional CEQA Analysis Required
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a,b) The Program EIR determined that the program elements would have the potential to result in the substantial adverse change in the significance of a buried archaeological resource; this impact was concluded to be less than significant with mitigation (Program EIR Impact CR-1). The project is within the scope of the Program EIR because it would not affect any known historical or archaeological resources and mitigation would be implemented in the event historical or archaeological resources are inadvertently discovered.

Consistent with what is described in the Program EIR, the project would not affect any known historical or archaeological resources; however, historical or archaeological resources could be damaged in the event of an inadvertent discovery of cultural resources during construction. The Cultural Survey Report confirmed that there are no known historic-era resources or unique archaeological resources in road ROW where potential pipeline routes are known; however, the project has the potential to affect previously unrecorded archaeological resources and known resources if on-farm connections on private lands are not sited to avoid known resources. Known resources identified during preparation of the Cultural Survey Report will be avoided when selecting potential routes for on farm connections on private lands through implementation of the recommended studies/inventory described below.

In compliance with Mitigation Measures CR-1a and CR-1b, the construction contractor will be required to halt construction in the event potential historic or archaeological resources are discovered and all construction plans will note that construction, excavation, and earthwork shall cease immediately if historical or archaeological resources are discovered. These mitigation measures will be incorporated into the project (see Chapter 5, "Applicable Mitigation Measures from the Program EIR").

As indicated on page 3.6-17 of the Program EIR, for cultural resources "...additional inventory would be required before construction of program level elements." Consistent with this statement from the Program

EIR, implementation of the following recommendations would avoid impacts to important archaeological resources by ensuring that additional studies are completed in areas with high archaeological sensitivity. If archaeological resources are identified in the project area during the recommended studies/inventory, they would be avoided, and additional measures conducted as necessary to identify the extent and characteristics of the resource.

### **Cultural Resources Assessment for Service Connection Laterals and Turnouts in Areas of High Archaeological Sensitivity**

In areas determined to have high archaeological sensitivity based on the location of previously recorded archaeological sites and the environmental context (see Figures 1 and 2 in Appendix C to this Checklist), when Regional San begins coordination with landowners on routes and locations for the service connection laterals and turnouts to connect to individual agricultural users on private property, Regional San shall conduct a cultural resources investigation.

The cultural resources investigations shall, at a minimum, address the anticipated disturbance area for facility construction. Regional San shall retain a qualified archaeologist meeting the Secretary of the Interior's Qualification Standards. The qualified archaeologist will complete the following:

- ▶ An intensive cultural resources survey of the project area not previously surveyed for cultural resources, including all private property to connect service laterals and turnouts for individual agricultural users;
- ▶ A technical report disseminating the results of this research; and,
- ▶ Recommendations for avoidance of any sensitive locations, and if necessary, additional cultural resources work necessary to refine the area of avoidance and/or determine the type and significance of the resource.

The preferred approach where resources are found in the project alignment will be to adjust the alignment to entirely avoid the resource to an area where no resources have been identified. If only preliminary information on a resource is gathered, a sufficient disturbance buffer shall be established in coordination between Regional San and the archaeologist to be reasonably protective of the resource. If a suitable buffer cannot be determined, then further data may be gathered on the resource to better define its boundary and the area to be protected. Further data may also be gathered to determine the significance of a resource, with non-significant resources no longer requiring protection.

Once constructed, the proposed pipelines would be underground and would, therefore, not result in additional ground disturbance or potential to damage a historical or archaeological resource.

- c) The Program EIR determined that the program elements would have the potential to expose human remains during excavation; this impact was concluded to be less than significant with mitigation (Program EIR Impact CR-2). The project is within the scope of the Program EIR because it is not expected to disturb human remains and mitigation will be implemented if human remains are encountered.

The project is not expected to disturb any human remains; however, human remains could be damaged in the event of an inadvertent resource discovery during construction. In compliance with Mitigation Measure CR-2, the construction contractor will immediately halt construction within 100 feet of the location and contact the County Coroner. The mitigation measure will be incorporated into the project (see Chapter 5, "Applicable Mitigation Measures from the Program EIR").

Once constructed, the proposed pipelines would be underground and would, therefore, not result in additional ground disturbance or potential to disturb human remains.

## CONCLUSION

The project does not deviate from the building intensity, geographic area, or covered infrastructure described and analyzed in the Program EIR. The analysis herein does not identify any new or substantially more severe environmental impacts compared to the analysis in the Program EIR. Consequently, environmental effects of the project related to cultural resources are within the scope of the Program EIR and the project would not result in any effects that were not examined in the Program EIR. No new environmental document is required.

### 4.5.6 Energy

Section 3.7, "Energy Resources," of the Program EIR evaluates the impacts of the program on energy resources. It presents environmental setting information, the regulatory framework, the analysis methodology, thresholds of significance, and a detailed environmental impact evaluation.

Energy	Impact Examined in Program EIR	Impact Not Examined in Program EIR		
		No Impact	Less-than-Significant Impact	Additional CEQA Analysis Required
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a,b) The Program EIR determined that the program elements would not result in the wasteful, inefficient, or unnecessary consumption of energy resources; this impact was concluded to be less than significant (Program EIR Impact ENE-1). The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR, and in the same geographic area. Additionally, construction and operation activities would be consistent with those described and analyzed in the Program EIR.

Consistent with what is described in the Program EIR, project construction would require the use of fuels (primarily gas, diesel, and motor oil) for a variety of construction activities, including excavation, grading, and vehicle travel. Use of these fuels would not be wasteful or unnecessary because their use is necessary to contribute to the long-term distribution, use, and reliability of water resources within the project area. However, excessive idling and other inefficient site operations during construction could result in the inefficient use of fuels. Fuels would not be used wastefully during construction because doing so would not be economically sustainable for contractors. In addition, implementing SMAQMD’s required emission control practices (see Chapter 5, "Applicable Mitigation Measures from the Program EIR"), would reduce air pollutant emissions by a variety of methods including limiting idling, and would also reduce inefficient use of fuels. Implementation of this measure would reduce the inefficient use of construction-related fuels.

As noted in the Program EIR, the Feasibility Study determined that the Harvest Water Program would decrease energy consumption in two areas: (1) avoided groundwater pumping energy and (2) avoided wastewater discharge energy. The avoided cost of groundwater pumping would translate to a reduction in energy consumption by approximately 5,000 megawatts per year (MWh/yr). Because less water would be discharged into the Sacramento River, the Harvest Water Program would also reduce energy consumption from avoided wastewater discharge by 750 MWh/yr.

### CONCLUSION

The project does not deviate from the building intensity, geographic area, or covered infrastructure described and analyzed in the Program EIR. The analysis herein does not identify any new or substantially more severe environmental impacts compared to the analysis in the Program EIR. Consequently, environmental effects of the project related to energy are within the scope of the Program EIR and the project would not result in any effects that were not examined in the Program EIR. No new environmental document is required.

### 4.5.7 Geology and Soils

Section 3.8, "Geology and Soils," of the Program EIR evaluates the impacts of the program on geology and soils. It presents environmental setting information, the regulatory framework, the analysis methodology, thresholds of significance, and a detailed environmental impact evaluation.

Section 3.6, "Cultural Resources," of the Program EIR evaluates the impacts of the program on paleontological resources. It presents environmental setting information, the regulatory framework, the analysis methodology, thresholds of significance, and a detailed environmental impact evaluation.

Geology and Soils	Impact Examined in Program EIR	Impact Not Examined in Program EIR		
		No Impact	Less-than-Significant Impact	Additional CEQA Analysis Required
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect risks to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a,c,d) The Program EIR determined that the program elements would not exacerbate existing environmental hazards or conditions, resulting in a substantial risk of loss, injury, or death, because the geotechnical analysis required as part of the California Building Standards Code would incorporate appropriate standard

engineering practices and specifications in facility design to minimize these risks; this impact was concluded to be less than significant (Program EIR Impact GEO-2). The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR, and in the same geographic area.

As described in the Program EIR, the project area consists of flat terrain and is not in an area subject to landslides. Additionally, the project area is underlain by soils characterized as clay with little or no swelling potential. Therefore, the project would have no impact related to landslides or expansive soil conditions.

As described in Section 3.8.1, "Environmental Setting," of the Program EIR, Sacramento County is less affected by seismic activity and other related geologic hazards than other locations throughout California. However, seismic events could still result in secondary seismic impacts associated with unstable soils such as lateral spreading, liquefaction, and subsidence. Lateral spreading is the lateral movement of saturated soils due to earthquake induced liquefaction. If not designed correctly, the project could be subject to misalignment of pipelines, failure of joints, and recycled water leakage from pipelines after a seismic event. Leakage from pipelines could saturate soils, contributing to conditions for liquefaction, lateral spreading, and subsidence. Structural failures could thus result in increased risk to safety. However, the geotechnical analysis required as part of the California Building Standards Code would incorporate appropriate standard engineering practices and specifications in facility design to minimize risk of structural failure in a seismic event, and would reduce secondary impacts that may occur as a result.

- b) The Program EIR determined that the program elements would not result in substantial soil erosion, siltation, or loss of topsoil because compliance with the Construction General Permit would ensure that best management practices (BMPs) are implemented during construction; this impact was concluded to be less than significant (Program EIR Impact GEO-1). The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR, in the same geographic area, and involving the same types of construction activities.

Construction activities involving ground disturbance, such as excavation, stockpiling, and grading could result in increased erosion, sedimentation, and siltation to surface waters. A review of soil data shows that soils within the project area have a range of slow to high runoff potential (see **Error! Reference source not found.** in the Program EIR), indicating potentially significant impacts from soil erosion. Because construction activities would disturb more than one acre of soil, project construction would be required to comply with the Construction General Permit (Order No. 2009-0009-DWQ), which is issued by the State Water Resources Control Board (SWRCB). The Construction General Permit requires development and implementation of a stormwater pollution prevention plan (SWPPP). The SWPPP must include a site map(s) showing the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the site. The SWPPP must include BMPs the discharger would use to protect stormwater runoff; a visual monitoring program; and a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs. Compliance with the Construction General Permit would ensure that Regional San and its construction contractor(s) implement the mandated BMPs; therefore, the project would not result in substantial soil erosion, siltation, or the loss of topsoil.

- e) The Program EIR determined that the program elements would have no impacts associated with soils supporting septic tanks or alternative wastewater disposal systems. The project is within the scope of the Program EIR because it would not generate wastewater and would not include the installation of septic tanks or alternative wastewater disposal systems.
- f) The Program EIR determined that the program elements would result in ground disturbance and, thus, the potential for discovery and disturbance of paleontological resources; this impact was concluded to be less than significant with mitigation (Program EIR Impact CR-1). The project is within the scope of the Program EIR because it would have a similar potential to result in the destruction or disturbance of paleontological resources during construction and the same mitigation measures would be applied.

Consistent with the Program EIR, project construction would result in ground disturbance and, thus, the potential for discovery and disturbance of paleontological resources; however, implementation of Mitigation Measures CR-1a through CR-1c would reduce this impact because these measures would ensure that previously undiscovered resources (if found) would be evaluated and the resources would be recorded, protected, and/or preserved. These mitigation measures will be incorporated into the project (see Chapter 5, "Applicable Mitigation Measures from the Program EIR").

## CONCLUSION

The project does not deviate from the building intensity, geographic area, or covered infrastructure described and analyzed in the Program EIR. The analysis herein does not identify any new or substantially more severe environmental impacts compared to the analysis in the Program EIR. Consequently, environmental effects of the project related to geology and soils are within the scope of the Program EIR and the project would not result in any effects that were not examined in the Program EIR. No new environmental document is required.

### 4.5.8 Greenhouse Gas Emissions

Section 3.4, "Air Quality and Greenhouse Gas Emissions," of the Program EIR evaluates the impacts of the program on air quality and GHG emissions. It presents environmental setting information, the regulatory framework, the analysis methodology, thresholds of significance, and a detailed environmental impact evaluation.

The following analysis pertains to GHG emissions. Air quality is addressed in Section 4.5.3, "Air Quality," in this Initial Study Checklist.

To supplement the analysis in the Program EIR, the Air Quality and GHG Technical Report (Regional San 2020a) was prepared to identify and analyze the potential air quality and GHG impacts associated with the project. This report is included as Appendix A.

Greenhouse Gas Emissions	Impact Examined in Program EIR	Impact Not Examined in Program EIR		
		No Impact	Less-than-Significant Impact	Additional CEQA Analysis Required
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) The Program EIR determined that the program elements would generate GHG emissions during construction and operation, but would not exceed SMAQMD’s significance thresholds; this impact was concluded to be less than significant (Program EIR Impact GHG-1). The project is within the scope of the Program EIR because it would not exceed SMAQMD thresholds for construction or stationary sources and would not result in any effects that were not examined in the Program EIR.

Consistent with what is described in the Program EIR, construction and operation activities would generate GHG emissions; however, the increase in GHG emissions associated with the project would not exceed 1,100 metric tons of carbon dioxide equivalent (MTCO<sub>2e</sub>) construction emission threshold or 10,000 MTCO<sub>2e</sub> per year threshold for stationary sources.

The Air Quality and GHG Technical Report (Appendix A) concludes that based on modeling conducted for the project, construction of the distribution mains, service connection laterals, and turnouts is estimated to generate 61 MTCO<sub>2e</sub> per year over the project’s operational life span, which is below SMAQMD’s 1,100 MTCO<sub>2e</sub> construction emission threshold. The Air Quality and GHG Technical Report also evaluated a scenario where the project and the pump station and transmission line were constructed concurrently. Construction GHG emissions under this scenario are also below SMAQMD’s construction emissions threshold. Project operational emissions were analyzed in the Program EIR and were determined to have a less than significant impact under SMAQMD’s stationary source threshold. Emissions from weekly on-road vehicles for routine maintenance of the pipelines would be nominal.

b) The Program EIR determined that the program elements would be consistent with applicable GHG reduction plans; it was concluded that no impact would result (Program EIR Impact GHG-2). The project is within the scope of the Program EIR because it would be consistent with applicable GHG emission reduction plans and would not result in any effects that were not examined in the Program EIR.

Consistent with what is described in the Program EIR, no impact would occur from the project related to consistency with applicable GHG emission reduction plans. The proposed recycled water delivery system would not conflict with the California Air Resources Board’s 2017 Scoping Plan Update and California’s efforts



to reduce GHGs by reducing energy needs for water supply through recycled water infrastructure and programs. The Air Quality and GHG Technical Report (Appendix A) concludes that the project would be consistent with the City of Elk Grove's Climate Action Plan because operational emissions would decrease over time with the use of electric pumps as more of California's power supply is sourced from renewable sources as discussed in the Program EIR. In addition, the project's operations would be consistent with federal, State, and local plans to reduce GHG emissions by reducing the energy needed to pump groundwater from existing wells to serve the surrounding agriculture uses (Appendix A).

## CONCLUSION

The project does not deviate from the building intensity, geographic area, or covered infrastructure described and analyzed in the Program EIR. The analysis herein does not identify any new or substantially more severe environmental impacts compared to the analysis in the Program EIR. Consequently, environmental effects of the project related to GHG emissions are within the scope of the Program EIR and the project would not result in any effects that were not examined in the Program EIR. No new environmental document is required.

### 4.5.9 Hazards and Hazardous Materials

Section 3.9, "Hazards and Hazardous Materials," of the Program EIR evaluates the impacts of the program on hazards and hazardous materials. It presents environmental setting information, the regulatory framework, the analysis methodology, thresholds of significance, and a detailed environmental impact evaluation.

Hazards and Hazardous Materials	Impact Examined in Program EIR	Impact Not Examined in Program EIR		
		No Impact	Less-than-Significant Impact	Additional CEQA Analysis Required
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) The Program EIR determined that the program elements would not create any significant hazards to the public or the environment associated with the transport, use or disposal of hazardous materials; it was concluded that no impact would occur. The project is within the scope of the Program EIR because it would not involve the routine transport, use, or disposal of hazardous materials as it consists of operation of pipelines. Thus, the project would not create any significant hazards to the public or the environment associated with the transport, use or disposal of hazardous materials.

- b) The Program EIR determined that the program elements could expose the public or environment to a substantial hazard through reasonably foreseeable upset conditions involving the release of hazardous materials into the environment; this impact was concluded to be less than significant with mitigation (Program EIR Impact HAZ-1). The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR, in the same geographic area, and involving the same types of construction activities.

During pipeline construction, the contractor would use limited quantities of fuels, oils, lubricants, solvents, and other materials that are classified as hazardous. All materials would be stored, handled, and used in accordance with applicable laws. Some excavated materials would be hauled off site and disposed of as required by state and federal regulations, and waste would be classified and disposed of properly.

Consistent with what is described in the Program EIR, unidentified areas of contaminated soils may be present along the pipeline alignments, and installation of the pipelines could result in the exposure of construction workers to potentially contaminated soils due to improper removal of existing hazardous materials on site or from other historic releases of hazardous materials to soil or groundwater in the area. Implementation of Mitigation Measure HAZ-1, which would require studies to assess the presence of soil and/or groundwater contamination and identify disposal methods, would reduce potential impacts related to exposure to hazardous materials to a less-than-significant level. The mitigation measure will be incorporated into the project (see Chapter 5, "Applicable Mitigation Measures from the Program EIR").

- c) The Program EIR determined that the program elements would not create a significant hazard to the public or the environment associated with the transport, use or disposal of hazardous materials within 0.25 mile of an existing or proposed school; it was concluded that no impact would occur. The project is within the scope of the Program EIR because it consists of installing underground pipelines and related infrastructure in the same geographic area described and analyzed in the Program EIR.
- d) The Program EIR determined that the program elements would not be located on a site included on a list of hazardous materials site compiled pursuant to Government Code Section 65962.5 (Cortese List) and, therefore, would not create a significant hazard to the public or the environment; it was concluded that no impact would occur. The project is within the scope of the Program EIR because it consists of installing underground pipelines and related infrastructure in the same geographic area described and analyzed in the Program EIR.
- e) The Program EIR determined that the program elements would not result in a significant safety hazard for people residing or working in the project area within two miles of a public use airport; this impact was concluded to be less than significant (Program EIR Impact HAZ-2). The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR, and in the same geographic area.

Franklin Field is located in the southern portion of the recycled water service area on Bruceville Road between Lambert Road and Twin Cities Road (see Figure 3-2). As described in the Program EIR, the Comprehensive Land Use Plan for Franklin Field was prepared by the Airport Land Use Commission in 1992, and identified height restrictions, noise restrictions, and safety restrictions for areas surrounding the airport. Because the proposed pipelines would be below ground facilities, they would not be considered an obstruction to air navigation by the Federal Aviation Administration (FAA) or penetrate the height notification limits of FAA Part 77 (ALUC 1992). Additionally, proposed pipelines would not interfere with the operating compatibility of the airport, or endanger pilots or passengers of aircraft. As discussed in the Comprehensive Land Use Plan, the area surrounding the airport is exposed to the potential for aircraft accidents, which resulted in the establishment of safety areas to minimize the number of people exposed to aircraft crash hazards. Because the proposed pipelines would be underground and would not require above ground facilities that exceed height restrictions, the project would not result in a safety hazard for people residing or working in the project area within two miles of Franklin Field.

- f) The Program EIR determined that impacts related to implementation of an emergency response plan or emergency evacuation plan would be less than significant with mitigation (Program EIR Impact HAZ-3) because construction could interfere with the accessibility of roadways to emergency vehicles; however, implementation of Mitigation Measure TR-1, which would require the preparation and implementation of a traffic management plan, would reduce this impact. The project is within the scope of the Program EIR because it would have a similar potential to interfere with the accessibility of roadways to emergency vehicles during construction and the same mitigation measure would be applied. Thus, the project would not result in any effects that were not examined in the Program EIR. The mitigation measure will be incorporated into the project (see Chapter 5, "Applicable Mitigation Measures from the Program EIR").
- g) As described in Section 4.5.20, "Wildfire," the project would be located in a primarily agricultural area characterized by orchards, fields of row crops, and scattered rural residences and farm structures (e.g., barns). The project area is relatively flat due to active farming and agricultural operations. Existing wildfire risk in the project area is minimal as it is not near areas with high wildfire fuel loads; by their nature farmed lands have roads, canals, and other features that act as fire breaks; and farmed lands have irrigation systems that prevent the vegetation that is present from becoming overly dry. Given the topography of the project area and its proximity to water it is unlikely that construction of the project would exacerbate wildfire risk. The project would provide recycled water to agricultural customers via proposed underground pipelines and appurtenances. The project would not include habitable structures. For these reasons, the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. No impact would occur.

## CONCLUSION

The project does not deviate from the building intensity, geographic area, or covered infrastructure described and analyzed in the Program EIR. The analysis herein does not identify any new or substantially more severe environmental impacts compared to the analysis in the Program EIR. Consequently, environmental effects of the project related to hazards and hazardous materials are within the scope of the Program EIR and the project would not result in any effects that were not examined in the Program EIR. No new environmental document is required.

### 4.5.10 Hydrology and Water Quality

Section 3.10, "Hydrology and Water Quality," of the Program EIR evaluates the impacts of the program on hydrology and water quality. It presents environmental setting information, the regulatory framework, the analysis methodology, thresholds of significance, and a detailed environmental impact evaluation.

Hydrology and Water Quality	Impact Examined in Program EIR	Impact Not Examined in Program EIR		
		No Impact	Less-than-Significant Impact	Additional CEQA Analysis Required
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial on- or offsite erosion or siltation;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) The Program EIR determined that construction of program elements could result in increased erosion and sedimentation to surface waters and contaminated stormwater runoff, which could degrade water quality. Compliance with the Construction General Permit, implementation of construction BMPs, and compliance with the General Order for Dewatering or other appropriate National Pollutant Discharge Elimination System (NPDES) permit would reduce potential water quality degradation. This impact was concluded to be less than significant with mitigation (Program EIR Impact HYD-1). The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR.

Construction activities involving soil disturbance, excavation, cutting/filling, stockpiling, dewatering and grading activities could result in increased erosion and sedimentation to surface waters. If precautions are not taken to contain contaminants, construction could produce contaminated stormwater runoff (nonpoint source pollution), which is a contributor to the degradation of water quality. In addition, hazardous materials associated with construction equipment could adversely affect surface and groundwater quality if spilled or stored improperly. In accordance with the Construction General Permit, a SWPPP would be developed for the project that would detail BMPs for construction activities, including excavation, dewatering, and stockpiling. During project construction, dewatering would be conducted to remove excess groundwater from excavations created for pipeline installation. Dewatering operations would be conducted in accordance with the General Order for Dewatering or other appropriate NPDES permit. The discharge from the dewatering operations would be evaluated and made part of the project SWPPP.

Once the pipelines are constructed, hydrostatic testing would need to be conducted, and water from the testing would also need to be discharged. Water from testing would be discharged in accordance with the General Order for Dewatering or other appropriate NPDES permit.

In compliance with Mitigation Measures HYD-1a, HYD-1b, and HYD-1c, the construction contractor would be required to comply with the Construction General Permit, implement construction BMPs, and comply with the General Order for Dewatering or other appropriate NPDES permit. These mitigation measures will be incorporated into the project (see Chapter 5, "Applicable Mitigation Measures from the Program EIR").

- b) The Program EIR determined that construction and operation of the program elements would not deplete groundwater supplies because the program would not involve extraction of groundwater; instead, it would benefit the groundwater basin and would not result in adverse impacts related to groundwater supply depletion. This impact was concluded to be beneficial (Program EIR Impact HYD-2). The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR, and would deliver recycled water to the project area. The existing source of water supply in the project area is primarily groundwater pumped from private wells. Use of tertiary recycled water for agricultural irrigation in the South County would offset groundwater pumping and, as such, reduce dependence on the Central Sacramento Groundwater Basin. Specifically, the Harvest Water Program would provide recycled water to meet 2/3 of the maximum month demand during peak use periods and 100 percent of the demand in off-peak months (September through May), thus conserving groundwater. Because supplying recycled water for irrigation would allow reductions in groundwater pumping, the Harvest Water Program would result in substantial increases in groundwater storage in the Central Basin.
- c.i-ii) The Program EIR determined that the program elements would not increase the amount of impervious surfaces or the amount or rate of surface runoff, thus resulting in a less-than-significant impact (Program EIR Impact HYD-3). The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR. Aboveground facilities would be limited to air valves along the new pipelines, which would add very little impervious surface to the landscape. These above-ground facilities would be too small to have any appreciable impact on surface runoff or existing drainage patterns.

Consistent with the Program EIR, the project could temporarily alter the existing drainage patterns of creeks or waterways during construction as pipeline crossings would be necessary. Pipelines would cross several creeks and drainages; however, as described in Chapter 3, "Project Description," pipeline installation would be accomplished using trenchless construction techniques at all creek/drainage crossings. Therefore, the project would not alter the existing drainage pattern in the project area. The project would be operated in a manner that minimizes off-site runoff, both because recycled water would be subject to volumetric charges, which provide incentives not to waste water, and because the Statewide Recycled Water Order, under which the project would operate, prohibits excess runoff.

- c.iii) The Program EIR determined that the program elements would not create or contribute substantial runoff water that would exceed the capacity of existing or planned stormwater drainage systems; it was concluded that there would be no impact. The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR. The proposed pipelines would be buried underground within public road ROW and would not create or contribute runoff. Thus, the project would not create or contribute substantial runoff water that would exceed the capacity of existing or planned stormwater drainage systems.
- c.iv) The Program EIR determined that the program elements would not impede or redirect flood flows; it was concluded that there would be no impact. The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR. The pipelines would be buried and would not affect flood flows. Above-ground facilities would be limited to air valves along the new pipelines and, thus, would not impede or redirect flood flows.
- d) The Program EIR determined that the program elements would not expose people or structures to a risk of loss, injury or death involving flooding; it was concluded that there would be no impact. The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR. As described in item c.iv), above, the project would include very limited above ground structures and would not appreciably affect flood flows or runoff volumes. Further, the project would have no impact on any levees or dams and would not increase the risk of failure of any levee or dam.
- e) The project would comply with all federal, state, and local regulations and requirements for construction and implementation of the project, including the San Francisco Bay/Sacramento-San Joaquin Delta Water Quality Control Plan (Bay-Delta Plan) and the Groundwater Sustainability Plan for the DWR South American Subbasin. The Basin Plan establishes control measures to be implemented by the RWQCB as applicable to the project. The Basin Plan also provides water quality objectives and waste discharge requirements (WDRs) to minimize impacts to water quality. NPDES permits are one method to regulate WDRs. The Program EIR found that discharge reductions associated with the program would have minor impacts on Delta outflows (Program EIR Impact HYD-4) but could affect storage in Shasta. With implementation of Mitigation Measure HYD-4 this impact would be less than significant. The discharge reductions associated with the project were fully evaluated in the Program EIR, and thus the project does not change that conclusion. As discussed in item a), above, the project would be covered under the Construction General Permit, and the recycled wastewater has been addressed through WDRs and an NPDES permit specific to the Regional San wastewater treatment plant, and allows for this use. Thus, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, this impact would be less than significant.

## CONCLUSION

The project does not deviate from the building intensity, geographic area, or covered infrastructure described and analyzed in the Program EIR. The analysis herein does not identify any new or substantially more severe environmental impacts compared to the analysis in the Program EIR. Consequently, environmental effects of the project related to hydrology and water quality are within the scope of the Program EIR and the project would not result in any effects that were not examined in the Program EIR. No new environmental document is required.

### 4.5.11 Land Use and Planning

Section 3.2, "Land Use and Agriculture," of the Program EIR evaluates the impacts of the program on land use and agriculture. It presents environmental setting information, the regulatory framework, the analysis methodology, thresholds of significance, and a detailed environmental impact evaluation.

The following analysis pertains to land use. Agricultural resources are addressed in Section 4.5.2, "Agriculture and Forestry Resources," in this Initial Study Checklist.

Land Use and Planning	Impact Examined in Program EIR	Impact Not Examined in Program EIR		
		No Impact	Less-than-Significant Impact	Additional CEQA Analysis Required
Would the project:				
a) Physically divide an established community?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) The Program EIR determined that the program elements would not physically divide an established community; it was concluded that no impact would occur. The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR, and in the same geographic area. The project would not construct infrastructure that would physically divide a community. The proposed pipelines and appurtenances would be underground and would be used to convey recycled water to agricultural customers.
- b) The Program EIR determined that the program elements would not conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the Harvest Water Program; this impact was concluded to be less than significant/beneficial (Program EIR Impact LUA-1). The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR, and in the same geographic area.

Figure 4-4 shows the existing land uses within and adjacent to the project site. Construction and operation of the project would not result in any changes to land use. The proposed pipelines and appurtenances would be located underground, primarily within public ROWs, although construction could temporarily occur on adjacent agricultural land. The project does not include residential, commercial, or agricultural development and would not alter land use designations of existing land uses. The project would also not introduce new uses or result in changes to the functions of the Cosumnes River Preserve (shown in Figure 4-5). Providing recycled water to agricultural customers in the South County would contribute to Sacramento County's goals and objective of protecting farmland, enhancing the viability of the agricultural economy, and reducing or eliminating groundwater cones of depression in farming areas. In addition, the use of recycled water in an area currently relying primarily on groundwater would be consistent with groundwater management policies in the area. Therefore, the project would be consistent with the Land Use Elements of the Sacramento County General Plan and City of Elk Grove General Plan and the Cosumnes River Preserve Management Plan.

### CONCLUSION

The project does not deviate from the building intensity, geographic area, or covered infrastructure described and analyzed in the Program EIR. The analysis herein does not identify any new or substantially more severe environmental impacts compared to the analysis in the Program EIR. Consequently, environmental effects of the project related to land use and planning are within the scope of the Program EIR and the project would not result in any effects that were not examined in the Program EIR. No new environmental document is required.



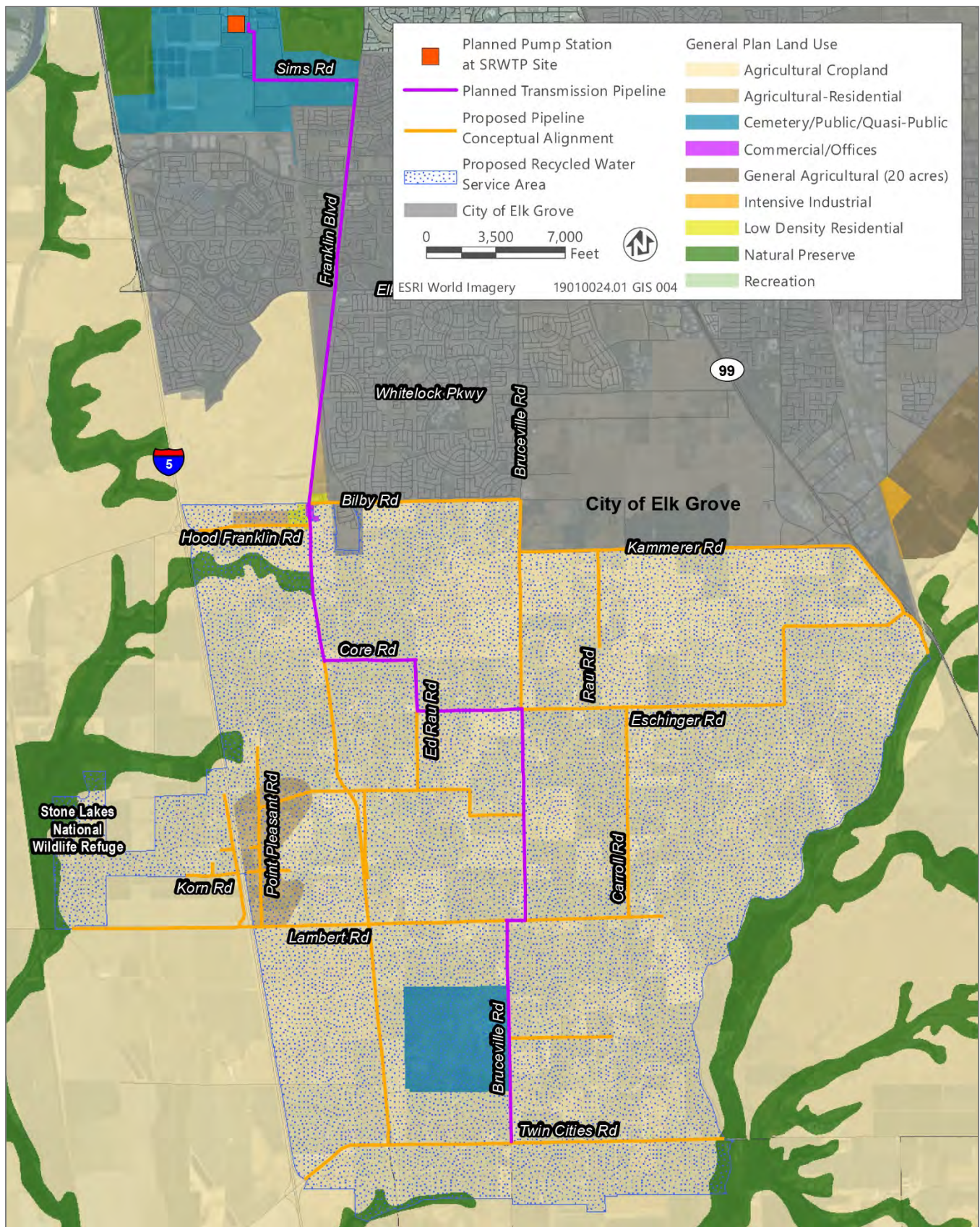
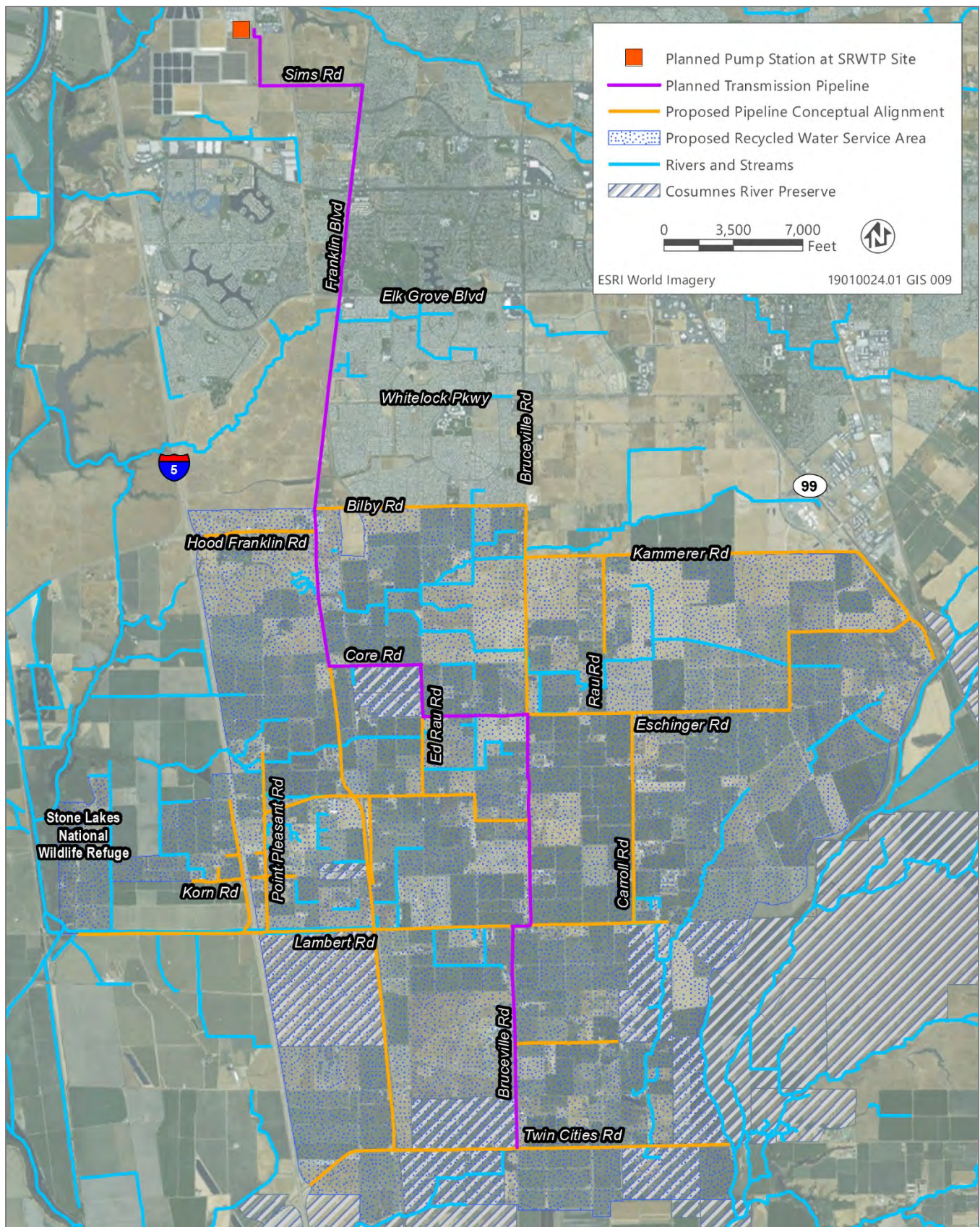


Figure 4-4 Land Use



Source: Data downloaded from CCED, CPAD, and Sacramento County in 2018 and 2019

Figure 4-5 Cosumnes River Preserve Lands

### 4.5.12 Mineral Resources

Section 3.8, "Geology and Soils," of the Program EIR evaluates the impacts of the program on geology and soils, including mineral resources. It presents environmental setting information, the regulatory framework, the analysis methodology, thresholds of significance, and a detailed environmental impact evaluation.

Mineral Resources	Impact Examined in Program EIR	Impact Not Examined in Program EIR		
		No Impact	Less-than-Significant Impact	Additional CEQA Analysis Required
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a,b) The Program EIR determined that the program elements would not be located within any areas of mineral resources or significant mineral deposits; it was concluded that no impact would occur. The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR, and in the same geographic area.

### CONCLUSION

The project does not deviate from the building intensity, geographic area, or covered infrastructure described and analyzed in the Program EIR. The analysis herein does not identify any new or substantially more severe environmental impacts compared to the analysis in the Program EIR. Consequently, environmental effects of the project related to mineral resources are within the scope of the Program EIR and the project would not result in any effects that were not examined in the Program EIR. No new environmental document is required.

### 4.5.13 Noise

Section 3.12, "Noise," of the Program EIR evaluates the impacts of the program on noise. It presents environmental setting information, the regulatory framework, the analysis methodology, thresholds of significance, and a detailed environmental impact evaluation.

Noise	Impact Examined in Program EIR	Impact Not Examined in Program EIR		
		No Impact	Less-than-Significant Impact	Additional CEQA Analysis Required
Would the project:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) **Construction:** The Program EIR determined that implementation of the Harvest Water Program would generate short-term and temporary noise during construction, which would not violate local noise standards, but that could cause annoyance to residences along the construction corridor; this impact was concluded to be less than significant with mitigation (Program EIR Impact NOI-1). The project is within the scope of the Program EIR because it consists of construction of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR, and in the same geographic area.

Consistent with what is described in the Program EIR, the project would be located in a primarily agricultural area with scattered rural residences in some areas. Construction activities would generate noise, which could affect sensitive receptors along the proposed pipeline alignments. However, the noise would be intermittent and short-term as construction is expected to occur in phases between 2021 and 2024. Typical work hours would be Monday through Friday from 7:00 a.m. to 7:00 p.m. (construction noise is exempt from noise ordinances between 6 a.m. and 8 p.m. on weekdays within Sacramento County and the City of Elk Grove), and construction might take place during weekends and nighttime (e.g., for connection of new pipelines to existing pipelines in heavy traffic areas) if necessary, and if approved by the affected jurisdictions. The construction contractor would be responsible for obtaining the necessary permits to conduct weekend and nighttime activities. In compliance with Mitigation Measure NOI-1, the construction contractor would be required to implement noise reduction measures to reduce the impact of noise from construction activities. Implementation of Mitigation Measure NOI-1 would reduce the exposure of persons to, or generation of, noise levels in excess of standards established by the Sacramento County General Plan and Noise Ordinance. The mitigation measure will be incorporated into the project (see Chapter 5, "Applicable Mitigation Measures from the Program EIR").

**Operation:** The Program EIR determined that the program elements would not expose people to or generate noise levels in excess of local noise standards; this impact was concluded to be less than significant (Program EIR Impact NOI-2). The project is within the scope of the Program EIR because it consists of underground

pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR, and in the same geographic area. Consistent with what is described in the Program EIR, operation of the proposed pipelines would not require facilities that generate noise during operations and would not result in the generation of noise above the ambient levels without the project.

- b) **Construction:** The Program EIR determined that the program elements would not expose people to or generate excessive groundborne vibration or groundborne noise levels; this impact was concluded to be less than significant (Program EIR Impact NOI-3). The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR, and in the same geographic area.

Consistent with what is described in the Program EIR, vibrational impacts from construction would mainly be associated with the use of bulldozers, loaded trucks, and jackhammers. The closest residences would be within 25 feet of the proposed pipelines. The vibration levels in Table 3.12-6 of the Program EIR indicate that operation of heavy construction equipment would not generate vibration levels that could cause threshold (cosmetic) damage to fragile buildings. Vibration from construction equipment would not exceed the PPV threshold of 0.2 inches per second.

**Operation:** Once operational, the proposed pipelines and appurtenances would be located below ground and would not require facilities that generate vibration during operations. Therefore, there would be no operational vibration impacts.

- c) The Program EIR determined that the program elements would not expose people residing or working in the project area to excessive noise levels near a public use airport; it was concluded that no impact would occur. The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR, and in the same geographic area. As described in the Program EIR, some of the proposed pipelines in the recycled water service area would be near Franklin Field; however, the project does not include inhabited structures or facilities within any airports and, therefore, the project would not expose people (residents or workers) to excess noise near a public use airport. Further, the Harvest Water Program was determined to be consistent with applicable General Plans, which are themselves consistent with the Franklin Field Comprehensive Land Use Plan (ALUC 1992) that addresses noise.

## CONCLUSION

The project does not deviate from the building intensity, geographic area, or covered infrastructure described and analyzed in the Program EIR. The analysis herein does not identify any new or substantially more severe environmental impacts compared to the analysis in the Program EIR. Consequently, environmental effects of the project related to noise are within the scope of the Program EIR and the project would not result in any effects that were not examined in the Program EIR. No new environmental document is required.

### 4.5.14 Population and Housing

Section 3.17, "Population and Housing," of the Program EIR evaluates the impacts of the program on population and housing. It presents environmental setting information, the regulatory framework, the analysis methodology, thresholds of significance, and a detailed environmental impact evaluation.

Population and Housing	Impact Examined in Program EIR	Impact Not Examined in Program EIR		
		No Impact	Less-than-Significant Impact	Additional CEQA Analysis Required
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) The Program EIR determined that the program elements would not directly induce population growth, nor would it remove an obstacle to growth; this impact was concluded to be less than significant (Program EIR Section 4.2, "Growth Inducing Impacts"). The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR, and in the same geographic area.

As described on page 4-3 of the Program EIR, the Harvest Water Program would provide recycled water for non-potable uses (e.g., irrigation of landscapes), thus conserving existing water supplies for potable uses (e.g., to meet future, approved growth). As a program component, the Lateral Pipelines and On-Farm Connections Project would provide recycled water to existing customers for agricultural irrigation, which would offset the use of groundwater.

The project would not directly induce population growth, as no new residential or commercial development projects would be served by the project and the project would not require new permanent employees who would generate a demand for new housing. Growers in this region rely on groundwater to meet their irrigation needs. The project would offset a portion of existing groundwater use; during peak periods, farmers would rely on existing wells to pump groundwater to meet demand. Recycled water would be used beneficially for irrigation purposes for existing growers in lieu of being discharged into the Sacramento River and being exported out of the region. The Zone 41 Urban Water Management Plan discusses the Harvest Water Program as part of the overall water supply for the region. Thus, the Harvest Water Program would be expected to help the region meet existing demands and is not expected to remove an obstacle to growth.

b) The Program EIR determined that the program elements would not displace any existing housing units and would not necessitate the construction of replacement housing; it was concluded that there would be no impact. The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR. The project includes construction of buried pipelines primarily within existing roadways. These areas are not inhabited by people. As such, the project would not displace any existing housing units and would not necessitate the construction of replacement housing.

## CONCLUSION

The project does not deviate from the building intensity, geographic area, or covered infrastructure described and analyzed in the Program EIR. The analysis herein does not identify any new or substantially more severe environmental impacts compared to the analysis in the Program EIR. Consequently, environmental effects of the project related to population and housing are within the scope of the Program EIR and the project would not result in any effects that were not examined in the Program EIR. No new environmental document is required.

### 4.5.15 Public Services

Section 3.13, "Public Services and Utilities," of the Program EIR evaluates the impacts of the program on public services and utilities. It presents environmental setting information, the regulatory framework, the analysis methodology, thresholds of significance, and a detailed environmental impact evaluation.

The following analysis pertains to public services. Utilities are addressed in Section 4.5.19, "Utilities and Service Systems," in this Initial Study Checklist.

Public Services	Impact Examined in Program EIR	Impact Not Examined in Program EIR		
		No Impact	Less-than-Significant Impact	Additional CEQA Analysis Required
Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) The Program EIR determined that the program elements would not directly or indirectly induce population growth and, thus, would not require new or expanded public services; it was concluded that there would be no impact. The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR, and in the same geographic area. As discussed above in Section 4.5.14, "Population and Housing," the project would not directly or indirectly induce growth. As such, it would not require new or expanded fire protection, police protection, schools, parks, or other public services and/or facilities. In addition, given the nature of the project (underground recycled water pipelines), project operation would not affect the ability of local service providers to maintain acceptable service ratios, response times, or other performance objectives. The project is not expected to increase the need for new staff for public service providers.

### CONCLUSION

The project does not deviate from the building intensity, geographic area, or covered infrastructure described and analyzed in the Program EIR. The analysis herein does not identify any new or substantially more severe environmental impacts compared to the analysis in the Program EIR. Consequently, environmental effects of the project related to public services are within the scope of the Program EIR and the project would not result in any effects that were not examined in the Program EIR. No new environmental document is required.



### 4.5.16 Recreation

Section 3.3, "Recreation," of the Program EIR evaluates the impacts of the program on recreation. It presents environmental setting information, the regulatory framework, the analysis methodology, thresholds of significance, and a detailed environmental impact evaluation.

Recreation	Impact Examined in Program EIR	Impact Not Examined in Program EIR		
		No Impact	Less-than-Significant Impact	Additional CEQA Analysis Required
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) The Program EIR determined that construction of the program elements would involve temporary road closures, which could adversely affect access to park facilities, and construction dust and noise could disrupt the enjoyment of recreational users; this impact was concluded to be less than significant with mitigation (Program EIR Impact REC-1). The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR, and in the same geographic area.

Construction of the proposed pipelines and appurtenances would occur primarily in roadway ROWs. Therefore, the project would not directly alter existing recreational facilities. Consistent with the Program EIR, project construction activities could result in short-term impacts related to access to park facilities due to temporary closures of roadway lanes to accommodate the construction trench and staging areas or disrupt the enjoyment of users due to construction dust and noise (see Sections 4.5.3, "Air Quality," Section 4.5.8, "Greenhouse Gas Emissions," Section 4.5.13, "Noise," and Section 4.5.17, "Transportation," for a discussion of these impacts). These temporary road closures could adversely affect access to park facilities and construction dust and noise could disrupt the enjoyment of recreational users. In compliance with Mitigation Measures TR-1 and NOI-1, Regional San and/or the construction contractor would be required to ensure that access is maintained to adjacent uses, including parks, and that construction noise is controlled and minimized, respectively. These mitigation measure will be incorporated into the project (see Chapter 5, "Applicable Mitigation Measures from the Program EIR").

b) The Program EIR determined that the program elements would not include the construction or expansion of recreational facilities that could result in direct adverse physical effect on the environment; it was concluded that there would be no impact. The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR, and in the same geographic area. The project, as a component of the Harvest Water Program, would provide recycled water to existing agricultural irrigation customers; however, the project would not increase the capacity of wastewater treatment or disposal and would not generate demand such that population growth or increase in demand for recreation facilities would occur. The project would not include the construction or expansion of recreational facilities that could result in direct adverse physical effect on the environment. In addition, the project would not induce population growth that would increase use of existing parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

## CONCLUSION

The project does not deviate from the building intensity, geographic area, or covered infrastructure described and analyzed in the Program EIR. The analysis herein does not identify any new or substantially more severe environmental impacts compared to the analysis in the Program EIR. Consequently, environmental effects of the project related to recreation are within the scope of the Program EIR and the project would not result in any effects that were not examined in the Program EIR. No new environmental document is required.

### 4.5.17 Transportation

Section 3.14, "Traffic and Transportation," of the Program EIR evaluates the impacts of the program on traffic and transportation. It presents environmental setting information, the regulatory framework, the analysis methodology, thresholds of significance, and a detailed environmental impact evaluation.

Transportation	Impact Examined in Program EIR	Impact Not Examined in Program EIR		
		No Impact	Less-than-Significant Impact	Additional CEQA Analysis Required
Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) **General Plan Level of Service Policies**

The Program EIR addressed the potential effect of the project on traffic operations in the project study area; this impact was concluded to be less than significant with mitigation (Program EIR Impact TR-1). The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR, and in the same geographic area.

The Program EIR stated that the project would result in a temporary increase in local traffic as a result of construction-related workforce traffic, equipment, and material deliveries. It was also noted that construction would occur within and/or across a number of roadways, which could temporarily disrupt existing transportation and circulation in the vicinity of the project. However, as detailed under Impact TR-1 of the Program EIR, implementation of Mitigation Measure TR-1 would require the preparation and implementation of a traffic management plan (TMP). The TMP would be prepared in accordance with the *California Manual of Uniform Traffic Control Devices* and all applicable requirements of the California Department of Transportation, the County of Sacramento Department of Public Works, and the City of Elk Grove Department of Public Works. Additionally, the TMP requires approval by the affected jurisdictions prior to construction and must be complied with at all times during project construction. Finally, the TMP requires specific measures designed to address the need for temporary traffic control and other traffic safety measures to maintain proper traffic flow during temporary construction activities. Therefore, the Program EIR determined that impacts to traffic operations would be reduced to a less-than-significant level with the implementation of Mitigation Measure TR-1.

The number of project-generated daily construction workers (i.e., 50 workers) and trucks accessing the site daily (i.e., 20 trucks) would be consistent with what was assumed in the Program EIR. Therefore, the number of vehicle trips generated by the project would be consistent with what was analyzed in the Program EIR. Mitigation Measure TR-1 would require that the TMP provide alternative routes for all modes during full road closures; include traffic detour plans to the satisfaction of the City/County Engineer for any lane closures; implement temporary traffic control measures to warn, control, protect, and expedite vehicular traffic; and ensure that deliveries of heavy equipment and construction materials are scheduled during periods of minimum traffic flow. The mitigation measure will be incorporated into the project (see Chapter 5, "Applicable Mitigation Measures from the Program EIR").

Therefore, with implementation of Mitigation Measure TR-1, temporary impacts related to traffic operations would be reduced to a less-than-significant level. The project would not result in any new significant impacts or substantially more severe impacts.

### **Transit, Bicycle, and Pedestrian**

The Program EIR determined that impacts to transit, bicycle, and pedestrian facilities would be less than significant with mitigation (Program EIR Impact TR-1). The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR, and in the same geographic area.

As detailed in the Program EIR, public transit operates in the vicinity of the project area, and thus, these transit routes and bus stops could be affected by the anticipated temporary and intermittent road and lane closures associated with construction activity within and along the public ROW. Additionally, as a result of construction within the public ROW, bicycle and pedestrian facilities (i.e., bike lanes and sidewalk/crosswalks) could be affected by construction of the pipelines. However, as detailed under Impact TR-1 of the Program EIR, implementation of Mitigation Measure TR-1 would require the preparation and implementation of a TMP which would include specific measures designed to minimize impacts to public transit and non-motorized travel. Therefore, the Program EIR determined that impacts to transit, bicycle, and pedestrian facilities would be reduced to a less-than-significant level with the implementation of Mitigation Measure TR-1.

Mitigation Measure TR-1 would require that the TMP provide alternative routes for all modes during full road closures; include bicycle and pedestrian or traffic detour plans to the satisfaction of the City/County Engineer for any lane or sidewalk closures; implement temporary traffic control measures to warn, control, protect, and expedite bicycle and pedestrian traffic; and notify and coordinate potential road closures with transit operators prior to construction. The mitigation measure will be incorporated into the project (see Chapter 5, "Applicable Mitigation Measures from the Program EIR").

Therefore, with implementation of Mitigation Measure TR-1, project-generated impacts to transit, bicycle, and pedestrian facilities would be reduced to a less-than-significant level. The project would not result in any new significant impacts or substantially more severe impacts.

- b) Senate Bill 743, passed in 2013, required the Governor's Office of Planning and Research to develop new CEQA Guidelines that address traffic metrics under CEQA. As stated in the legislation (and Section 21099[b][2] of CEQA), upon adoption of the new CEQA guidelines, "automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the CEQA guidelines, if any."

The Office of Administrative Law approved the updated CEQA Guidelines on December 28, 2018, and the changes are reflected in new CEQA Guidelines (Section 15064.3). State CEQA Guidelines Section 15064.3 was added December 28, 2018, to address the determination of significance for transportation impacts. Pursuant to the new CEQA Guidelines, vehicle miles traveled (VMT) will replace congestion as the metric for determining transportation impacts. The CEQA Guidelines state that "lead agencies may elect to be governed by these provisions of this section immediately. Beginning July 1, 2020, the provisions of this section shall apply statewide."

The Program EIR was certified in 2017. As described above, the updated CEQA Guidelines were not adopted until December 28, 2018, subsequent to certification of the Program EIR in 2017. Section 15007 of the CEQA Guidelines addresses amendments to the CEQA Guidelines and states: "If a document meets the content requirements in effect when the document is sent out for public review, the document shall not need to be revised to conform to any new content requirements in Guideline amendments taking effect before the document is finally approved." (CEQA Guidelines Section 15007[c]) Stated another way, because the EIR was circulated for public review (and completed) prior to this change in the CEQA Guidelines, the new provisions regarding VMT do not apply to this project. Therefore, the shift from automobile delay to VMT as the primary metric used to analyze transportation impacts under CEQA, as dictated by CEQA Guidelines Section 15064.3, does not constitute "new information" as defined in CEQA Guidelines Section 15162 and, even if it was "new information," CEQA Guidelines Section 15007 directs that the document "shall not need to be revised" to reflect this information.

- c) The Program EIR determined that the program elements could substantially increase transportation hazards due to the anticipated temporary and intermittent road and lane closures associated with construction activity within and along the public ROW. However, with the implementation of Mitigation Measure TR-1, which would require the preparation and implementation of a TMP, impacts to transportation hazards as a result of construction activities would be minimized. Therefore, the Program EIR determined that impacts associated with transportation hazards would be reduced to a less-than-significant level with the implementation of Mitigation Measure TR-1 (Program EIR Impact TR-3). The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR, and in the same geographic area.

As detailed in the Program EIR, Mitigation Measure TR-1 would require that the location and timing of any temporary lane or roadway closures be identified, temporary traffic control plans be included and circumstances requiring the use of temporary traffic control measures be provided, vehicle safety procedures for entering and exiting site access roads and staging areas be identified, and potential road closures be coordinated with applicable entities. The mitigation measure will be incorporated into the project (see Chapter 5, "Applicable Mitigation Measures from the Program EIR").

Therefore, with implementation of Mitigation Measure TR-1, project-generated impacts to transportation hazards would be reduced to a less-than-significant level. The project would not result in any new significant impacts or substantially more severe impacts.

- d) The Program EIR determined that the program elements could result in inadequate emergency access related to temporary and intermittent road and lane closures associated with construction activity within and along the public ROW. However, with the implementation of Mitigation Measure TR-1, which would require the preparation and implementation of a TMP, impacts to emergency access as a result of construction activities would be minimized. Therefore, the Program EIR determined that impacts to emergency access would be reduced to a less-than-significant level with the implementation of Mitigation Measure TR-1 (Program EIR Impact TR-4).

As detailed above, Mitigation Measure TR-1 would require that a TMP be prepared. In addition to the TMP measures directly related to lane and road closures identified above under Item c), Mitigation Measure TR-1 would also require that emergency responders be notified and coordinated with prior to any potential road closures, access for emergency vehicles in and around the project area be maintained at all times, and procedures for construction area evacuation in the case of an emergency declared by county or other local authorities be identified. The mitigation measure will be incorporated into the project (see Chapter 5, "Applicable Mitigation Measures from the Program EIR").

Therefore, with implementation of Mitigation Measure TR-1, potential impacts to emergency access would be reduced to a less-than-significant level. The project would not result in any new significant impacts or substantially more severe impacts.

## CONCLUSION

The project does not deviate from the building intensity, geographic area, or covered infrastructure described and analyzed in the Program EIR. The analysis herein does not identify any new or substantially more severe environmental impacts compared to the analysis in the Program EIR. Consequently, environmental effects of the project related to transportation are within the scope of the Program EIR and the project would not result in any effects that were not examined in the Program EIR. No new environmental document is required.

## 4.5.18 Tribal Cultural Resources

Assembly Bill (AB) 52, signed by the California governor in September of 2014, establishes a new class of resources under CEQA: "tribal cultural resources." It requires that lead agencies undertaking CEQA review must, upon written request of a California Native American tribe, begin consultation after the lead agency determines that the application for the project is complete, before a notice of preparation (NOP) of an EIR or notice of intent to adopt a negative declaration or mitigated negative declaration is issued. AB 52 also requires revision to CEQA Appendix G, the environmental checklist. This revision has created a new category for tribal cultural resources (TCRs).

The Program EIR does not address TCRs because it was not required to do so. The NOP for the Program EIR was issued on February 19, 2015 (State Clearinghouse No. 2015022067), and AB 52 went into effect on July 1, 2015. Because the NOP was released before AB 52 went into effect, the Program EIR was not required to address TCRs. Further, because this Initial Study Checklist tiers from the Program EIR, it also is not required to address TCRs.

### 4.5.19 Utilities and Service Systems

Section 3.13, "Public Services and Utilities," of the Program EIR evaluates the impacts of the program on public services and utilities. It presents environmental setting information, the regulatory framework, the analysis methodology, thresholds of significance, and a detailed environmental impact evaluation.

The following analysis pertains to utilities. Public services are addressed in Section 4.5.15, "Public Services," in this Initial Study Checklist.

Utilities and Service Systems	Impact Examined in Program EIR	Impact Not Examined in Program EIR		
		No Impact	Less-than-Significant Impact	Additional CEQA Analysis Required
Would the project:				
a) Require or result in the relocation or construction of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has inadequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) **Water and Wastewater**  
 The Program EIR determined that the program elements would result in impacts associated with the construction of new water or wastewater treatment and disposal facilities or expansion of existing facilities; this impact was concluded to be less than significant with mitigation (Program EIR Impact PUB-1). The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR, and in the same geographic area.

Consistent with the Program EIR, the project involves construction of new facilities (pipelines) to augment water supply with recycled water. The environmental effects of the proposed facilities are evaluated throughout the Program EIR and this document. The existing source of water supply in the project area is primarily groundwater pumped from private wells. The project would provide tertiary recycled water for agricultural irrigation in South County, which would offset groundwater pumping and reduce dependence on

the Central Sacramento Groundwater Basin. By providing recycled water for agricultural irrigation, demands on groundwater supplies and groundwater pumping would be reduced.

### **Stormwater**

The Program EIR determined that the program elements would not generate a need for new stormwater drainage facilities or the expansion of existing facilities; this impact was concluded to be less than significant (Program EIR Impact PUB-2). The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR. The project would not generate stormwater runoff as the proposed pipelines would be buried underground. Therefore, the project would not generate a need for new stormwater drainage facilities or the expansion of existing facilities.

- b) The Program EIR determined that the program involves construction of new facilities to augment water supply with recycled water elements, the environmental effects of which were analyzed throughout the Program EIR; thus, it was concluded that there would be no impact. The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR. The project involves construction of new facilities to augment water supply with recycled water. The environmental effects of the proposed facilities are evaluated throughout the Program EIR and this document. The project would not require or result in the construction of new water supply facilities beyond those being analyzed within these documents.
- c) The Program EIR determined that the program elements would not generate additional demand for wastewater treatment or disposal; it was concluded that there would be no impact. The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR. The project would provide recycled water as a source of non-potable water for beneficial use. As a water supply project that uses recycled water, the project would not generate any additional demand for wastewater treatment or disposal.
- d,e) The Program EIR determined that the program elements would be served by a landfill with sufficient permitted capacity would comply with all federal, state, and local statutes and regulations related to solid waste; this impact was concluded to be less than significant (Program EIR Impact PUB-3). The project is within the scope of the Program EIR because it consists of underground pipelines and related infrastructure consistent with the facilities described and analyzed in the Program EIR and would be served by the same landfill.

During project construction, there would be minimal solid waste generated that would require disposal at a landfill. Spoil (soil and rock) excavated during construction would either be reused on site for backfill or disposed of properly. Spoil not suitable for reuse would be temporarily stored at staging areas until characterized, and then hauled away to the proper disposal site (e.g., landfill). Additional solid waste would be generated by construction crews within the project area, which would need to be hauled off site to be disposed. Solid waste generated during construction, including spoil that cannot be reused, would be delivered to the Kiefer Landfill. This landfill is currently sized to satisfy all county landfill disposal needs through 2064. In addition, Regional San would comply with all federal, state, and local statutes and regulations related to solid waste.

## **CONCLUSION**

The project does not deviate from the building intensity, geographic area, or covered infrastructure described and analyzed in the Program EIR. The analysis herein does not identify any new or substantially more severe environmental impacts compared to the analysis in the Program EIR. Consequently, environmental effects of the project related to utilities and service systems are within the scope of the Program EIR and the project would not result in any effects that were not examined in the Program EIR. No new environmental document is required.



### 4.5.20 Wildfire

Wildfire was not addressed in the Program EIR because a wildfire analysis was not required at that time. Changes to Appendix G of the State CEQA Guidelines were adopted in December 2018 and wildfire was added as a new resource to be evaluated in CEQA documents. The following analysis describes the potential impacts of the Lateral Pipelines and On-Farm Connections Project related to wildfire and wildfire-related risks.

Wildfire	Impact Examined in Program EIR	Impact Not Examined in Program EIR		
		No Impact	Less-than-Significant Impact	Additional CEQA Analysis Required
Is the project located in or near state responsibility areas or lands classified as high fire hazard severity zones?				
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
	<input type="checkbox"/> Yes		<input checked="" type="checkbox"/> No	
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Consistent with what is described in the Program EIR, the project would be located in a primarily agricultural area characterized by orchards, fields of row crops, and scattered rural residences and farm structures (e.g., barns). The project area is relatively flat due to active farming and agricultural operations. The Cosumnes River borders the project area to the southeast.

The California Department of Forestry and Fire Protection maintains fire hazard severity zone (FHSZ) maps for the Local Responsibility Area (LRA) and State Responsibility Area (SRA). These areas are mapped based on fuels, terrain, weather, and other relevant factors. The project area is located within the LRA and is not categorized as a "Very High" FHSZ. Approximately five miles southwest of the project area is a federal responsibility area that is not designated as a "Very High" FHSZ. The western portion of Sacramento County, approximately 15 miles east of the project area, is within the SRA but is not located in an FHSZ. No portions of the project area are located in or near lands classified as high fire hazard severity zones (CAL FIRE 2008). Further, the project area is not located in or near a wildland urban interface (WUI) area (University of Wisconsin-Madison 2020).

- a) As described in Section 4.5.9, "Hazards and Hazardous Materials," the Program EIR addressed potential impacts related to emergency response or evacuation plans. The Program EIR determined that impacts related to implementation of an emergency response plan or emergency evacuation plan would be less than

significant with mitigation (Program EIR Impact HAZ-3) because construction could interfere with the accessibility of roadways to emergency vehicles; however, implementation of Mitigation Measure TR-1, which would require the preparation and implementation of a traffic management plan, would reduce this impact. The project is within the scope of the Program EIR because it would have a similar potential to interfere with the accessibility of roadways to emergency vehicles during construction and the same mitigation measure would be applied. Thus, the project would not result in any effects that were not examined in the Program EIR. The mitigation measure will be incorporated into the project (see Chapter 5, "Applicable Mitigation Measures from the Program EIR").

- b) The project area is not located within or near an SRA or WUI area. Thus, wildfire risk in the project area is minimal. By their nature farmed lands have roads, canals, and other features that act as fire breaks; and farmed lands have irrigation systems that prevent the vegetation that is present from becoming overly dry. The topography of the project area and its proximity to water is unlikely to exacerbate wildfire risk. Because the location and topography of the project area are unlikely to exacerbate wildfire risk, factors such as slope and prevailing wind would not further exacerbate the wildfire risk. Therefore, project area residents would not be exposed to pollutant concentrations or the uncontrolled spread of a wildfire, and no impact would occur.
- c) The project would provide recycled water to agricultural customers via proposed underground pipelines and appurtenances and would not require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities). Because the project would not require the installation of infrastructure that could exacerbate fire risk, and the topography of the project area and its proximity to water is unlikely to exacerbate wildfire risk, there would be no impact.
- d) The project would provide recycled water to agricultural customers via proposed underground pipelines and appurtenances. The project is in an area of flat terrain and would not involve changing slopes, and thus would not expose people or structures to risks of downslope or downstream flooding or landslides from runoff, post-fire instability, or drainage changes. No impact would occur.

## CONCLUSION

The project does not deviate from the building intensity, geographic area, or covered infrastructure described and analyzed in the Program EIR. The analysis herein does not identify any new or substantially more severe environmental impacts compared to the analysis in the Program EIR. Consequently, environmental effects of the project related to wildfire are within the scope of the Program EIR and the project would not result in any effects that were not examined in the Program EIR. No new environmental document is required.

### 4.5.21 Mandatory Findings of Significance

Mandatory Findings of Significance	Impact Examined in Program EIR	Impact Not Examined in Program EIR		
		No Impact	Less-than-Significant Impact	Additional CEQA Analysis Required
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) All applicable mitigation measures identified in the Program EIR to avoid and reduce impacts are integrated into the Lateral Pipelines and On-Farm Connections Project. Given the nature of the project (i.e., installation of underground pipelines in an agricultural area to provide recycled water to agricultural customers) and the integration of these measures, the project would not substantially degrade the quality of the environment. As described in Section 4.5.4, “Biological Resources,” of this Initial Study Checklist, the project would not significantly affect fish or wildlife habitat or species. The project area is primarily agricultural and project impacts would be addressed by Program EIR mitigation measures.

As described in Section 4.5.5, “Cultural Resources,” no cultural resources were identified on the project site and the project area is not within an area of archaeological sensitivity. Measures integrated into the project would avoid disturbance, disruption, or destruction of inadvertent archaeological resource discoveries. Therefore, the project would not eliminate any examples of the major periods of California history or prehistory.

b) No significant and unavoidable impacts were identified in the Program EIR, nor in this Initial Study Checklist for the Lateral Pipelines and On-Farm Connections Project. Further, no cumulatively considerable impacts were identified in the Program EIR; therefore, the Lateral Pipelines and On-Farm Connections Project would not incrementally contribute to any cumulatively considerable impacts. No conditions have substantially changed, and no new information has become available since certification of the Program EIR that would alter this previous analysis.

c) The project’s construction and operation emissions as well as the project’s contribution to level of service degradation are within the scope of impacts examined in the Program EIR. These impacts were also

addressed in the Findings adopted by Regional San in connection with its certification of the Program EIR. Effects of the project would not result in substantial adverse effects on human beings beyond those analyzed in the Program EIR. No conditions have substantially changed, and no new information has become available since certification of the Program EIR that would alter this analysis. No additional mitigation is available to reduce the project's contribution to these impacts. Other impacts with the potential to affect human beings were determined to be less than significant.

## CONCLUSION

The project does not deviate from the building intensity, geographic area, or covered infrastructure described and analyzed in the Program EIR. The analysis herein does not identify any new or substantially more severe environmental impacts compared to the analysis in the Program EIR. Consequently, environmental effects of the project are within the scope of the Program EIR and the project would not result in any effects that were not examined in the Program EIR. No new environmental document is required.

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## 5 APPLICABLE MITIGATION MEASURES FROM THE PROGRAM EIR

The following mitigation measures were adopted upon approval of the Program EIR and would be applicable to the mitigation of impacts associated with the proposed Lateral Pipelines and On-Farm Connections Project, which is an element of the Harvest Water Program (formerly, the South Sacramento Ag Program).

### 5.1 AESTHETICS

#### **Mitigation Measure AES-2: Nighttime Construction Lighting**

If nighttime construction lighting is required, the construction contractor shall shield and orient lighting downward and directed away from any nearby receptors to minimize effects. Lighting shall be directed toward active construction areas only, and shall have the minimum brightness necessary to ensure worker safety.

### 5.2 AGRICULTURE AND FORESTRY RESOURCES

#### **Mitigation Measure LUA-2: Stockpile Topsoil**

Regional San and/or its contractors shall stockpile topsoil removed during construction for later reuse. The soil shall be stored in a clear area of the construction site where it would not have the potential to affect agricultural or biological resources. Stockpiled soil shall be covered with a tarp at all times to prevent generation of fugitive dust. Following pipeline construction, soil shall be backfilled into the trench and restored to an appropriate level of compaction.

### 5.3 BIOLOGICAL RESOURCES

#### **Mitigation Measure BIO-1a: Avoid Impacts (Both Permanent and Temporary) to the Extent Feasible to Habitats and Land Cover Types Used by HCP-Covered and Non-HCP-Covered Sensitive Species**

Regional San and its contractors will avoid and minimize permanent and temporary impacts to habitats and land cover types used by sensitive species potentially occurring in the Project Area (as listed in Table 3.5 1 of the EIR for the Project). Avoidance and minimization of habitat areas will be accomplished during Project design work, and/or during construction by implementing best management practices, including establishment of buffer zones, installation of fencing around sensitive habitats, and implementation of a storm water pollution prevention plan (SWPPP) to reduce the potential for sediments or contaminants to enter sensitive habitats.

#### **Mitigation Measure BIO-1b: Mitigate Impacts to Habitats and Land Cover Types Used by HCP-Covered and Non-HCP-Covered Sensitive Species**

*Mitigation Measure BIO-1b in the Program EIR provides mitigation measures for habitats covered in the South Sacramento Habitat Conservation Plan (SSHCP). At the time the Program EIR was certified, the SSHCP had not yet been completed. The Harvest Water Program is a covered activity in the SSHCP, and therefore, it was anticipated that participation in the SSHCP would provide mitigation for covered species.*

*With the SSHCP now adopted and in effect, the habitat compensation measures provided in Mitigation Measure BIO-1b are now superseded by the habitat compensation protocols avoidance and minimization measures (AMMs) included in the SSHCP. The original text from Mitigation Measure BIO-1b in the Program EIR is not reproduced here as this measure is no longer in effect.*

*The SSHCP AMMs are provided in SSHCP Section 5.4.2, "Covered Species Take Avoidance and Minimization Measures," at <https://www.southsachcp.com/>. A file listing only the AMMs is available at <https://planning.sacounty.net/PlansandProjectsIn-Progress/Documents/SSCHP/AMMs%20Table.pdf>.*

*The Mitigation Monitoring and Reporting Program (MMRP) for the Program EIR is being updated to reflect the details of the approved SSHCP.*

### **Mitigation Measure BIO-1c: Mitigate Impacts to HCP-Covered Species**

*Mitigation Measure BIO-1c in the Program EIR provides mitigation measures for plant and wildlife species covered in the SSHCP. At the time the Program EIR was certified, the SSHCP had not yet been completed. The Harvest Water Program is a covered activity in the SSHCP, and therefore, it was anticipated that participation in the SSHCP would provide mitigation for covered species.*

*With the SSHCP now adopted and in effect, the species-specific measures provided in Mitigation Measure BIO-1c are now superseded by the habitat compensation protocols AMMs included in the SSHCP. The original text from Mitigation Measure BIO-1c in the Program EIR is not reproduced here as this measure is no longer in effect.*

*The SSHCP AMMs are provided in SSHCP Section 5.4.2, "Covered Species Take Avoidance and Minimization Measures," at <https://www.southsachcp.com/>. A file listing only the AMMs is available at <https://planning.sacounty.net/PlansandProjectsIn-Progress/Documents/SSCHP/AMMs%20Table.pdf>.*

*Also, see the Landowner Checklist (Appendix C to this document), which summarizes the covered species AMMs.*

*The MMRP for the Program EIR is being updated to reflect the details of the approved SSHCP.*

### **Mitigation Measure BIO-1d: Mitigate Impacts to Sensitive Non-HCP-Covered Species**

Several sensitive species with a low- to moderate potential to occur in or near the Project area are not included as covered species in the SSHCP. For these species, Regional San shall implement the following mitigation measures:

- ▶ **Non-SSHCP-Covered Sensitive Plants.** Prior to construction-related disturbance of natural community types and land covers in the Project area, a botanical survey(s) will be completed to determine if sensitive plant species occur in the Project area. Surveys will be conducted during the appropriate time of the year to facilitate detections and identifications. Sensitive non-SSHCP-covered plant species detected in the Project area will be avoided as feasible. If impacts to sensitive non-covered plant species cannot be feasibly avoided, Regional San will coordinate with Sacramento County and the resource agencies (CDFW and/or USFWS) as appropriate to determine the course of action, which may include relocation of plants to the SSHCP Preserve System or another conserved location.
- ▶ **Non-SSHCP-Covered Birds:** Song sparrow (Modesto population) or other sensitive, non-SSHCP-covered bird species may occur in the Project area. Prior to disturbance of natural community or land covers, Regional San or its contractors will conduct nesting bird surveys to determine if active nesting is occurring in the Project area. All active nests will be avoided to the extent feasible and a 25-foot buffer will be established and maintained around each active nest until such time that the nest is vacated.

### **Mitigation Measure BIO-2: Secure Regulatory Permits to Impact Riparian Habitat and other Sensitive Natural Communities**

Regional San shall obtain all necessary permits and approvals required to impact riparian habitat and sensitive natural communities, to the extent that these impacts may occur with development of any of the action alternatives. Necessary permits and approvals will include Clean Water Act permits (Section 404 and 401), FESA and CESA permits, and CDFW Lake and Streambed Alteration Agreement, and would include measures to avoid, minimize and compensate for any impacts so as to avoid any net loss in habitat value. Mitigation would include restoration of any habitats that were affected temporarily during construction, and could include purchase of credits from a mitigation bank if there are any permanent impacts to sensitive natural communities.

### **Mitigation Measure BIO-3: Secure Clean Water Act Permits/Approvals**

Regional San has prepared a wetland delineation report to identify and characterize aquatic resources within the vicinity of the Project area and will use this information to avoid wetlands and waters of the U.S. to the extent feasible. Once verified by the U.S. Army Corps of Engineers (USACE), the delineation will be used to secure permits/approvals under

Sections 404 and 401 of the Clean Water Act. The wetland delineation report will also be used to demonstrate consistency with the SSHCP and its terms and conditions for CWA and Endangered Species Act compliance. Compliance with SSHCP habitat-level conservation measures is assumed to satisfy mitigation requirements under Section 404 permitting, and conservation measures would be implemented by Regional San even if the SSHCP is not adopted. As stated earlier in this section, Regional San may be required to work directly with the USACE to satisfy Section 404 permitting needs for project impacts to wetlands and other waters of the U.S. if permitting associated with the SSHCP is not finalized at the time of the project permitting phase.

Mitigation may include restoration of affected jurisdictional areas to ensure no net loss of wetland functions and values. Mitigation may also include preservation or enhancement of existing wetland habitat, or creation of wetland habitat.

## 5.4 CULTURAL RESOURCES

### **Mitigation Measure CR-1a: Discovery of Previously Unknown Historic or Archaeological Resources during Construction**

If during excavation or earth moving activities, potential historic or archaeological resources are encountered, the County or local jurisdiction shall be notified and a professional archaeologist meeting the minimum qualifications in archaeology as set forth in the Secretary of the Interior's Standards and Guidelines shall be contracted by Regional San and dispatched to assess the nature and significance of the find in the following manner:

- ▶ All excavation and/or grading within 20 meters of the discovery area shall cease immediately. The responding archaeologist may, after analyzing the discovery, authorize an alternate (or reduced) buffer around the materials to ensure adequate evaluation and protection of potential historic and/or archaeological resource(s) during continued construction operations.
- ▶ Additional evaluation of the historic and/or archaeological resource(s) shall be conducted and significance of the materials determined. If the discovery is considered significant, the archaeologist shall develop and implement a late-discovery mitigation strategy in conjunction with Regional San, to minimize and/or avoid the impact through preparation and implementation of an avoidance, evaluation, or recovery plan that Regional San will implement. Such a plan may involve resource avoidance (preservation in place), or could include recovery and archival research (e.g., excavation, documentation, curation, data recovery, or other appropriate measures).

### **Mitigation Measure CR-1b: Note on Construction Plans**

Regional San shall require the inclusion of a note on all construction plans specifying that construction, excavation, and earthwork shall cease immediately if historical, archaeological, or paleontological resources are discovered to enable a professional archaeologist to assess, evaluate, and mitigate or avoid the potential impacts to resources as appropriate.

### **Mitigation Measure CR-1c: Discovery of Paleontological Resources During Construction**

If paleontological resources are discovered during earth moving activities, the construction crew shall immediately cease work near the find. A qualified paleontologist shall assess the nature and importance of the find and if the resource is determined to be significant, prepare an avoidance, evaluation, or recovery plan, which Regional San will implement. Such a plan may involve resource avoidance (preservation in place), or could include recovery and archival research, (e.g., excavation, documentation, curation, data recovery, or other appropriate measures) as well as additional monitoring.

### **Mitigation Measure CR-2: Discovery of Human Remains**

If human remains are encountered during the construction of the Project site or the off-site infrastructure corridor, California Health and Safety Code Section 7050.5 requires that all disturbance at the site cease immediately within a 100 foot radius of the discovery, the County Coroner be notified, and a determination of origin and disposition provided by the Coroner pursuant to Public Resource Code Section 5097.98. If the remains are determined to be prehistoric, the Coroner shall notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely



Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery.

The MLD shall complete the inspection within 24 hours of notification by the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

## 5.5 HAZARDS AND HAZARDOUS MATERIALS

### Mitigation Measure HAZ-1: Conduct Phase I Study along Transmission Pipeline

Prior to the start of construction, a Phase I hazardous waste/hazardous materials study for soil and groundwater contamination shall be completed for the transmission pipeline. The recommendations set forth in the Phase I assessment shall be implemented to the satisfaction of applicable agencies before construction begins. If Phase I assessments indicate the potential for contamination within the construction zone of the pipelines, Phase II studies shall be completed before construction begins. Phase II studies will include soil and groundwater sampling and analysis for anticipated contaminants. The Phase II sampling is intended to identify how to dispose of any potentially harmful material from excavations, and to determine if construction workers need specialized personal protective equipment while constructing the pipeline through that area. If soil or groundwater contaminated by potentially hazardous materials is exposed or encountered during construction that was not identified in the Phase I assessment, the appropriate hazardous materials agencies shall be notified. Any contaminated soil that is encountered during construction shall be disposed of in accordance with applicable regulations, at an approved landfill.

## 5.6 HYDROLOGY AND WATER QUALITY

### Mitigation Measure HYD-1a: Comply with the Construction General Permit

To minimize the impacts to water quality from construction activities, the proposed Project shall implement measures contained in the Construction General Permit including the development of a SWPPP.

### Mitigation Measure HYD-1b: Implement BMPs to Control Erosion and Sediment During Construction

The SWPPP shall specify that all construction activities shall implement multiple BMPs to provide effective erosion and sediment control. These BMPs shall be selected to achieve maximum sediment removal and represent the best available technology that is economically achievable. BMPs to be implemented as part of this mitigation measure shall include, but are not limited to, the following measures:

- ▶ Temporary erosion control measures, such as silt fences, staked straw bales/wattles, silt/sediment basins and traps, check dams, geofabric, sandbag dikes, and temporary revegetation or other ground cover, shall be employed for disturbed areas;
- ▶ Dirt and debris shall be swept from paved streets in the construction zone on a regular basis, particularly before predicted rainfall events;
- ▶ Grass or other vegetative cover will be re-established on unpaved areas of the construction site as soon as possible after disturbance. In paved areas, any removed paving will be replaced as soon as possible; and
- ▶ Soil stockpiling sites will be located such that they do not drain directly into nearby surface water bodies.

Multiple BMPs used in combination, properly installed and maintained, can achieve significant sediment removal. BMPs proposed by the project contractor shall be subject to approval Regional San, who shall require that all parties performing construction under the proposed Project incorporate into contract specifications the requirement that the contractor(s) comply with and implement these provisions. The contractor shall also include provisions for monitoring during and after construction activities to verify that these standards are met.

### **Mitigation Measure HYD-1c: Comply with the General Order for Dewatering or Other Appropriate NPDES Permit**

To minimize the impacts to water quality from dewatering activities, the Regional San shall implement measures contained in the General Order for Dewatering or other appropriate NPDES permit or Waste Discharge Requirement.

### **Mitigation Measure HYD-4: Coordinate Operations with Relevant Resource Agencies**

To minimize potential thermal impacts to the Sacramento River downstream of Lake Shasta during critically dry years due to losses of cold water storage from reduced treated wastewater discharges, Regional San shall work with the Bureau of Reclamation and other relevant resource agencies to make appropriate operational changes in recycled water use and timing of discharge reductions in the spring months when the cold water pool in Shasta is critical. In critically dry years when storage in Lake Shasta falls below 2,400,000 AF in April, Regional San will coordinate with Central Valley Operations staff to reduce deliveries of recycled water to farmers in April and May if needed to avoid thermal impacts to the Sacramento River below Lake Shasta, as determined by the Sacramento River Temperature Model being utilized by Reclamation in the given year.

## **5.7 NOISE**

### **Mitigation Measure NOI-1: Noise Reduction Measures**

To reduce the impact of noise from construction activities the following measures shall be implemented to the extent feasible:

- ▶ Heavy equipment and impact equipment use shall be restricted to daytime hours (7 a.m. to 7 p.m.).
- ▶ Construction staging areas shall be located as far as possible from existing residences.
- ▶ The project contractor shall be required to use impact tools (e.g., jack hammers, pavement breakers, and rock drills) that are hydraulically or electrically powered wherever possible, to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used, along with external noise jackets on the tools, which could reduce noise levels by as much as 10 dBA.
- ▶ Construction equipment noise shall be minimized during project construction by muffling and shielding intakes and exhaust on construction equipment per the manufacturers' specifications and by shrouding or shielding impact tools. All equipment shall have sound-control devices no less effective than those provided by the manufacturer.
- ▶ All stationary noise generating construction equipment shall be placed as far away as possible from sensitive receptors in an orientation minimizing noise impacts (e.g. behind barriers or storage piles).

## **5.8 TRANSPORTATION**

### **Mitigation Measure TR-1: Traffic Management Plan**

Implementation of the Project shall include a TMP that would minimize impacts on traffic as a result of construction activities. The TMP shall be prepared in accordance with the California Manual of Uniform Traffic Control Devices (California MUTCD) and all applicable requirements of Caltrans, the County of Sacramento Department of Public Works and the City of Elk Grove Department of Public Works. The TMP shall be approved by the affected jurisdictions prior to construction and complied with at all times during construction of the project. The TMP shall be prepared by a qualified transportation engineer and would include but not be limited to the following measures:

- ▶ Define location and timing of any temporary lane or roadway closures.
- ▶ Obtain permits and identify oversize and overweight load haul routes. Transport of oversized loads on state, county, and city roads will require oversize/overload permits from Caltrans, Sacramento County and the City of Elk Grove. Transporters will follow state and county regulations for transportation of oversized and overweight loads. Such

regulations typically include provisions for time of day, pilot cars, law enforcement escorts, speed limits, flaggers, and warning lights, which will be detailed in the respective oversized-load permits.

- ▶ Prepare Temporary Traffic Control (TTC) Plans for each site location. The construction contractor will submit any applicable pedestrian or traffic detour plans, to the satisfaction of the City/County Engineer, for any lane or sidewalk closures. The detour plan shall comply with Part 6, Temporary Traffic Control, of the California MUTCD, and standard construction practices. The TTC Plans will identify the need for flaggers for directing traffic, temporary signage, lighting, and traffic control devices, if required.
- ▶ Identify and provide for circumstances requiring the use of temporary traffic control measures, such as flag persons, warning signs, lights, barricades, and cones to provide safe work areas in the vicinity of the project site or along the haul routes, including for narrow roadway segments, and to warn, control, protect, and expedite vehicular, bicycle, and pedestrian traffic and access by emergency responders.
- ▶ Schedule deliveries of heavy equipment and construction materials during periods of minimum traffic flow. The timing of deliveries shall be coordinated with Sacramento County and the City of Elk Grove.
- ▶ Determine the need to schedule construction workforce arrival and departure times outside peak traffic periods.
- ▶ Determine the need for construction scheduling outside of legal holidays and special events.
- ▶ Identify vehicle safety procedures for entering and exiting site access roads and staging areas.
- ▶ Notify and coordinate potential road closures with emergency responders prior to construction.
- ▶ Ensure access for emergency vehicles to and around the Project area.
- ▶ Identify procedures for construction area evacuation in the case of an emergency declared by county or other local authorities.
- ▶ Maintain access to adjacent properties. The construction contractor will notify residential and commercial occupants of property adjacent to the construction site of the hours of construction activity which may impact the area. This notification will be provided one week in advance of the start of the extended construction activity.
- ▶ Notify and coordinate potential road closures with transit operators prior to construction.
- ▶ Maintain access to transit, bicycle, and pedestrian facilities along the project route(s).
- ▶ Notify and coordinate potential road closures with mail service and waste haulers prior to construction.

## 6 REFERENCES

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No references used in this chapter.

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## 5 Applicable Mitigation Measures from the Program EIR

No references used in this chapter.

## 7 LIST OF PREPARERS

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Dave Richardson, Woodard & Curran .....	Program Manager
Robin Cort, Woodard & Curran .....	Senior Environmental Planner

### Ascent Environmental, Inc. (CEQA Compliance)

Gary Jakobs, AICP .....	Principal
Sean Bechta .....	Project Manager
Sarah Henningsen .....	Assistant Project Manager
Stephanie Rasmussen .....	Environmental Planner
Alyssa Way .....	Air Quality and Greenhouse Gas Specialist
Poonam Boparai .....	Senior Air Quality and Greenhouse Gas Specialist
Pam Brillante .....	Biologist
Shannon Hickey .....	Biologist
Tammie Beyerl .....	Senior Biologist
Zach Miller, AICP .....	Transportation and Traffic Specialist
Phi Ngo .....	GIS Specialist
Brian Perry .....	Graphic Specialist
Gaiety Lane .....	Publishing Specialist
Michele Mattei .....	Publishing Specialist

### ESA (Cultural Resources)

Heidi Koenig, MA, RPA .....	Senior Archaeologist
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