

An Addendum to the Previously Certified
Palmdale Water District Water System Master Plan
Final Program Environmental Impact Report
(Well No. 37)

State Clearinghouse No. 2017021042

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Prepared for
Palmdale Water District



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1. Introduction

The Palmdale Water District (PWD) certified the Program Environmental Impact Report (PEIR) for the Palmdale Water District Water System Master Plan (WSMP) on November 26, 2018.

PWD developed a PEIR to implement the WSMP that outlines a programmatic plan for developing its potable water system over the next 25 years. The WSMP addresses both existing system deficiencies such as aging infrastructure as well as the need for facilities to accommodate for future growth. This includes facilities that were implemented in 2020 (near-term), as well as future projects to be implemented from 2021 through 2040 (long-term). PWD continues to implement its WSMP and now intends to initiate the Well Number 37 project (proposed project).

1.1 Program Objectives

The program objectives identified for the WSMP in the Final PEIR remain the same.

1.2 Summary of Improvements and Applicability of Addendum and CEQA Checklist

The Well Number 37 project includes construction and operation of the well, which is already evaluated at the programmatic level as one of five groundwater production wells identified as a long-term Capital Improvement Project (CIP) in the WSMP PEIR. The proposed project also includes installation and use of a percolation basin for disposal of well development water and pump-to-waste water.

This environmental review document serves two purposes:

- As an Addendum to the Program EIR, prepared under the California Environmental Quality Act (CEQA) Guidelines Section 15164, to make minor changes to the Project Description; and
- As a CEQA checklist prepared under CEQA Guidelines Section 15168(c)(4), to analyze whether environmental effects of the proposed project were covered in the PEIR. The document also serves as the evaluation pursuant to Section 15162 of the CEQA Guidelines of whether new significant effects have been identified, any identified significant impacts have increased in severity, or new mitigation measures would be required.

This addendum evaluates project-specific components of the Well No. 37 project and concludes that the proposed project does not cause new significant impacts and does not result in substantially more severe impacts relative to the impacts previously disclosed in the WSMP PEIR. Thus, an Addendum is the appropriate level of CEQA documentation and the appropriate method of amending the WSMP Certified PEIR, pursuant to Sections 15162 and 15164 of the Guidelines implementing CEQA.

As documented in the CEQA Checklist evaluations presented below, implementation activities for the proposed project are described in, and are within the scope of the WSMP PEIR. Therefore, the proposed

project would not result in substantial changes that warrant preparation of a subsequent or supplemental EIR pursuant to Sections 15162 and 15163 of the CEQA Guidelines.

The Addendum and CEQA checklist evaluations take into consideration changes in the environmental setting, cumulative projects, and regulations that have occurred since the WSMP PEIR was last updated in November 2018. This Addendum should be read together with the full text of the WSMP PEIR. The complete PEIR is available for review at the Palmdale Water District's Planning Reports website (http://www.palmdalewater.org/wp-content/uploads/2018/11/PWD_WSMP_Final_PEIR.pdf).

1.3 Organization of the Addendum and CEQA Checklist

The Addendum/CEQA Checklist is organized in a similar fashion to the Program EIR.

- Section 1 is the introduction and summary;
- Section 2 contains a description of the purpose of the Addendum;
- Section 3 includes a detailed description of the proposed project;
- Section 4 describes the mitigation and monitoring program;
- Section 5 includes the project-level CEQA Checklist are within the scope of the WSMP PEIR;
- Section 6 provides a summary of environmental effects; and
- Section 7 is the determination.

1.4 Applicability and Use of an Addendum for Project Elements Not Included in Program EIR

As directed by CEQA, California Public Resources Code Section 21166, and CEQA Guidelines Section 15162, when an EIR has been prepared for a project, no subsequent or supplemental EIR shall be prepared, unless one or more of the following circumstances occur:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

- The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
- Significant effects previously examined will be substantially more severe than shown in the previous EIR;
- Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The change in environmental impacts due to the proposed project and changed conditions have been evaluated and measured against the standards described above to determine whether an Addendum is appropriate or a subsequent or supplemental EIR is needed. The environmental analysis in Section 4 provides the detailed evaluation of each of these issues. The proposed project has been subjected to a detailed analytical process consistent with the methodology and thresholds of significance applied in the WSMP PEIR.

Section 15164 of the Guidelines implementing CEQA provides that an Addendum is the appropriate level of CEQA analysis when the circumstances defined in Section 15162 and 15163 calling for preparation of a Subsequent or Supplemental EIR do not occur. None of the circumstances that require a Subsequent or Supplemental EIR, such as new significant impacts or significant impacts of a substantially more severe nature, are present. Thus, an Addendum is the appropriate level of CEQA analysis and the appropriate method of updating the analysis in the Certified WSMP PEIR.

1.5 Use of the Program EIR for the Disinfection and Diversion Improvements

As directed by CEQA Guidelines Section 15168, when a Program EIR has been prepared for a project, the lead agency should use a written checklist to document its findings, as follows:

- (c) Use With Later Activities. Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.
 1. If a later activity would have effects that were not examined in the program EIR, a new initial study would need to be prepared leading to either an EIR or a negative declaration.
 2. If the agency finds that pursuant to Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that an agency

may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.

3. An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program.
4. Where the later activities involve site specific operations, the 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 within the scope of the program EIR.
5. A program EIR will be most helpful in dealing with later activities if it provides a description of planned activities that would implement the program and deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed project description and analysis of the program, many later activities could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required.

The proposed project has been subjected to a detailed analytical process consistent with the methodology and thresholds of significance applied in the Program EIR. The environmental analysis in Section 4 provides the site-specific examination of the site and activity as required under paragraph (4) above. Section 5 concludes that the effects of the improvements are the same as, or less than, the effects identified in the WSMP PEIR. Section 5 also concludes the proposed project is covered by, and are within the scope of the WSMP PEIR. Because the effects of the improvements are consistent with the requirements of Section 15168 of the Guidelines implementing CEQA, no further environmental document is required.

2. Purpose of Addendum

The purpose of this Addendum to the WSMP PEIR is to analyze the potential environmental impacts associated with the implementation of Well Number 37 (Well No. 37). This addendum has been prepared pursuant to the California Environmental Quality Act (CEQA) Guidelines 15164, to describe the modifications to the original approval and evaluate whether the proposed modifications present any new significant impacts not identified in the final PEIR, or increase the severity of any identified significant impacts that would require the preparation of a subsequent or supplemental EIR.

3. Project Description

As noted above, this project was previously evaluated at a programmatic level in the PEIR for the Palmdale WSMP. The following subsections provide additional detail of the proposed project at the project level to be evaluated in this addendum.

3.1 Project Location

The PWD service area is located in southern California, approximately 60 miles northeast of the City of Los Angeles, within the Antelope Valley, as shown in Figure 2-1 of the WSMP PEIR. The District's primary service area includes the majority of the City of Palmdale and portions of unincorporated Los Angeles County. The District is bordered to the south and west by the San Gabriel Mountain Range, the north by the City of Lancaster, and the east by the unincorporated community of Littlerock. The District encompasses 47 square miles of mainly developed areas of the City of Palmdale and surrounding sphere of influence, with agricultural uses around its perimeter.

The proposed project would implement the CIP included in the WSMP. The recommended projects in the CIP would allow PWD to address existing hydraulic system deficiencies, replace aging infrastructure, and provide the facilities necessary to provide a reliable water supply and meet future growth needs.

Well No. 37 would be located at a vacant lot centrally located between East Avenue P and East Ave Q and bounded by 25th Street East and 30th Street East in Palmdale, Los Angeles County, California.

3.2 Well Number 37 Project

PWD proposes construction and operation of new well (Well No. 37). It is anticipated that the new well would have a pumping rate of 1,000 gallons to 1,200 per minute (gpm) of raw groundwater. On-site disinfection treatment and distribution piping to connect to the water distribution system will be included as part of the proposed project.

The project would include drilling a new well and construction of the wellhouse and supporting facilities. The proposed project components are described in further detail below:

- Well – The well would be drilled to a depth of approximately 1,000 feet below ground surface (bgs). The conductor borehole would be up to 50 inches in diameter for a depth up to 50 feet below grade surface (0 to 50 feet bgs), 36 inches in diameter from 50 to 480 feet bgs and 30 inches in diameter for the remainder of the depth of the well (480 to 960 feet bgs). The well would include stainless steel well casing, screen, ancillary tubing, and seal.
- Well house – This single-story structure would house the well, pump, motor, and electrical equipment. It is anticipated that the building would be approximately 50 feet long by 50 feet wide (2,500 SF). The well house would be constructed of metal siding with a standing seam metal roof, similar to other well house facilities operated by PWD. A typical existing well house is shown in Figure 3.1-4 of the WSMP PEIR.
- Percolation Basin – A 50' x 80' percolation basin would be located near the proposed well site to allow for percolation of low-flow wastewater discharges during well development and testing and also for pump-to-waste water.
- Discharge and conveyance piping – Up to 750 feet of 12" Ductile Iron Pipe (DIP) or polyvinyl chloride (PVC) pipe would be installed from the well to the property line. Piping would be

installed to connect the well to the property line and from the well site to the distribution system. Up to 500 feet of DIP or PVC pipe will be installed to connect the well discharge to the percolation basin for well flushing.¹ All piping would be below grade and within the property boundary.

- Ancillary structures – Additional above-ground structures to support well operation include a 40-foot antenna, transformer (approximately 8' by 10') and surge tank (10 feet to 12 feet).
- Access and Security – An existing dirt road with an existing metal gate on 25 St East would be used to accommodate service vehicles. A second gate will be added to the existing gate at this road. Fencing around the perimeter of the project site would provide site security, similar to the fencing used at existing PWD facilities.
- Utilities and Stormwater Management – Connections to existing electric utilities would be required to serve the site. Stormwater would be managed onsite through existing grading and temporary best management practices consistent with local and state requirements. Any future installation of permanent stormwater or wastewater infrastructure would be subject to separate environmental review.

3.3 Operation and Maintenance

Operation of the well is anticipated to be automated. Maintenance of the well may include, but is not limited to, periodic removal of accumulated sediment and debris, replacement of non-operational machinery, and inspection and maintenance of all structures. It is anticipated that the well would be powered by an electric motor. Emergency backup power would be provided by a diesel fuel generator. Based on the anticipated head and capacity of Well No. 37, operation would require approximately 420 kW of total power for operation.

PWD staff would conduct routine visits to the site. Traffic trip generation associated with operation of the well is anticipated to be less than one trip per day.

3.4 Construction

Construction of the new groundwater well would include site preparation, mobilization of equipment to the well site, well drilling, water quality testing, installation of the well casing, gravel packing and finishing with a cement seal. Construction equipment to drill and test the well would include an auger rig, drill rig, small crane, welder, all-wheel drive forklift, pipe trailer, generator, Baker tanks, circulation pits, and a backhoe.

Water discharged during well drilling will remain onsite and will be routed to the percolation basin. All well development and testing water will be contained onsite and directed to a temporary percolation basin designed to prevent offsite discharge. No discharge to storm drains, surface waters, or waters of the

¹ PWD would construct piping to connect the well site to the existing water supply system under a separate project.

United States is proposed. Discharges will comply with applicable requirements of the Regional Water Quality Control Board and the Construction General Permit. Best management practices will be implemented to control sediment, turbidity, and erosion during all discharge activities.

After development of the well, a well house would be constructed to house the well, pump, and electrical equipment. Piping and the ancillary structures would be installed. Construction equipment to construct the well house would include a grader, paving equipment, roller, and a tractor, loader, or backhoe.

The duration of well drilling/testing operation is estimated at approximately five months and the duration for construction of the well house, ancillary structures, and equipping is estimated at approximately 12 months. During a portion of the drilling/testing operation, daily 24-hour drilling would be required. From pilot borehole drilling through initial well development, the drill rig must run 24 hours a day to maintain borehole stability and facilitate removal of residual drilling fluids. Temporary overhead nighttime lighting would be installed during the well drilling period. All lighting would be directed downwards to avoid light and glare impacts associated with construction. Other than the well drilling which will occur 24-hours a day, seven days a week during this temporary period, construction activities would generally be limited to the normal working hours established by the City of Palmdale, except when necessary due to weather or duration of a specific activity. Construction traffic would be routed along existing roads and would enter the site via a construction entrance (existing dirt road) from 25th Street East. Continuous 24-hour drilling will be limited to the minimum duration necessary to maintain borehole stability and complete initial well development.

Construction durations presented above represent conservative assumptions used for purposes of CEQA analysis. Actual construction durations may be shorter depending on field conditions and sequencing.

3.5 Updated and Revise Mitigation and Monitoring Program

A Mitigation Monitoring and Reporting Program has been prepared for the WSMP Final PEIR. All mitigation measures, implementation, monitoring and reporting actions applicable to well projects would be implemented for the proposed Well No. 37 project. No updates to the program are proposed.

All applicable mitigation measures from the WSMP Final PEIR are incorporated herein by reference and will be implemented as part of the proposed project. No new or modified mitigation measures are required.

3.6 Required Permits and Approvals

The following table lists the possible permits and approvals that would be required for implementation of Well No. 37.

Table 3-1. Anticipated Permits and Approvals

Agency	Type of Permit or Approval	Regulated Activity
Federal Agency		
None	--	--
State Agency		
State Water Resources Control Board	National Pollutant Discharge Elimination System (NPDES) Construction General Permit / SWPPP Approval	Land disturbance greater than 1 acre
State Water Resources Control Board	Water Supply Permit Amendment	Amendment to current water supply permit, including change in source supply (well completion)
Regional Agency		
Regional Water Quality Control Board	General Permit for Construction Discharges	Discharge requirements during construction and testing
Regional Water Quality Control Board	Drinking Water Permit	Amendment to existing drinking water permit
Antelope Valley Air Quality Management District	Permit to construct and operate	Equipment with the potential to emit air pollutants
Antelope Valley Watermaster	New Point of Extraction Well Application Form	Required for installation of a new well at a new point of extraction.
Los Angeles County		
Los Angeles County Public Health	Well Permit	Required for new well

Note: The proposed project does not include permanent wastewater or stormwater utility connections. No off-site wastewater discharge is proposed for startup or operation.

4. Environmental Analysis

This Addendum evaluates the potential for the proposed project to result in new or substantially greater significant impacts compared to the impacts disclosed in the certified WSMP PEIR. Implementation of the proposed project does not have the potential to change the regulatory framework, impact discussion, mitigation measures, or significance conclusions for the following environmental topics analyzed in the Final PEIR:

- Agriculture and Forestry Resources – There are no agriculture or forestry resources present at or in the vicinity of the proposed project site. Therefore, no impact would occur.
- Mineral Resources – There are no known mineral resources, including State-Designated Mineral Resource Zones, present or in the vicinity of the proposed project site. Therefore, no impact would occur.
- Population and Housing – The proposed project includes implementation of a well and would not displace existing housing or substantial numbers of people and would not require construction of replacement housing. Therefore, the proposed project does not directly induce

population growth by constructing new homes or businesses. Therefore, no impact would occur.

- Public Services – The proposed project includes development of a well to meet potable water system needs and would not result in the need for new or expanded fire and police protection, schools, or recreational facilities. Therefore, no impact would occur.
- Recreation – The proposed project involves development of a well to meet potable water system needs. As such, the project would not build new housing or otherwise have a direct impact on population growth that would result in impacts to recreational facilities due to increased use. The analysis also determined that the project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. As such, no impact would occur.
- Wildfire - The proposed project is located within a Local Responsibility Area (LRA) and is not designated as a Very High Fire Hazard Severity Zone (VHFHSZ). Therefore, no impact would occur that would exacerbate wildfire risks nor expose project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire.

The proposed project has the potential to cause new or more severe operational impacts or were not otherwise evaluated in the Final EIR due to updates to the CEQA Checklist. The following sections analyze those potential impacts.

4.1 Aesthetics (Section 3.1 of the PEIR)

The proposed well would be located at an undeveloped, vacant lot between E Avenue P and East Avenue Q, the same area as evaluated in the WSMP PEIR. The example of an existing PWD groundwater well depicted in Figure 3.1-4 of the WSMP PEIR remains representative of the proposed project. Additional at-grade features (i.e., the percolation basin) that were not evaluated in the WSMP PEIR would not result in additional impacts. The percolation basin would be designed to minimize contrasting features and blend with the surrounding landscape. The well and supporting facilities would not be visible from any City-designated scenic roadway, and while features could be visible momentarily from public vantage points when traveling along 25th Street East or 30th Street East, the well house and supporting facilities would be located in an area that is generally flat with some vegetation and is not expected to obstruct scenic vistas. While the proposed 40-foot antenna would be taller than other features at the project site, the antenna has minimal profile and therefore would not obstruct scenic views. In addition, implementation of AES-2 and AES-3 would screen above-ground features from public view and require the use of a similar aesthetic to existing structures in the vicinity to minimize contrasting features in the landscape.

Construction of the well would require 24-hour drilling for the duration of approximately one month, and as such, would require nighttime construction lighting. With implementation of Mitigation Measure AES-6, nighttime lighting would be shielded and pointed away from surrounding light-sensitive. Well housing and other above-ground supporting facilities would be designed to minimize glare or reflection using non-glare exterior materials and coatings, in accordance with Mitigation Measure AES-5.

Impacts regarding scenic vistas, visual character, and light and glare would be less than significant with implementation of mitigation measures. Therefore, implementation of the Well No. 37 project would not create new or additional impacts to aesthetic resources, or change the analysis and conclusions provided in the WSMP PEIR.).

4.2 Air Quality (Section 3.2 of the PEIR)

As disclosed in the WSMP PEIR, construction-related emissions have the potential to impact people and property. Operation of the proposed project would not require daily worker trips and vehicle miles traveled would be limited to routine maintenance activities. Operational emissions of the proposed project would be less than significant.

The proposed project would not conflict with growth projections in the Antelope Valley Air Quality Management District (AVAQMD) Ozone Attainment Plan (OAP). The proposed project would also incorporate control strategies, as applicable, consistent with the OAP. Construction of the proposed project would comply with AVAQMD Rule 403 (fugitive dust) requirements and would utilize a construction contractor(s) that complies with required and applicable Best Available Control Technology (BACT) and the California Air Resource Board (CARB) In-Use Off-Road Diesel Vehicle Regulation. As such, the proposed project would not conflict with, or obstruct, implementation of the OAP, and this impact would be less than significant.

Construction impacts would be temporary and limited to the period of time when construction activities are taking place. The proposed project would not be substantially larger in size and scale than the well projects evaluated in the WSMP PEIR. While the proposed project would include installation and use of a percolation basin, the general size and scale of the site would not substantially increase construction or operation activities that would generate emissions that could be in excess of the AVAQMD's significance thresholds. The proposed project would comply with the CARB Airport Toxic Control Measure (ATCM) anti-idling measure and applicable BACT and the In-Use Off-Road Diesel Vehicle Regulation. Projects of similar size, scale, and intensity were evaluated in the WSMP PEIR and did not generate regional daily construction emissions in excess of the regional daily construction emissions thresholds. Implementation of Mitigation Measures AQ-1 and AQ-2 would further reduce construction-related emissions to below significance thresholds. Therefore, construction of the proposed project would not generate regional daily construction emissions in excess of the regional daily construction emission thresholds and impacts would be less than significant with mitigation.

Implementation of the proposed project could increase energy usage, resulting in increased emissions associated with energy production. However, these emissions would be located largely outside the Mojave Desert Air Basin (MDAB). The primary source of emissions generated from operation of the proposed facilities would be from vehicle trips for worker inspection and maintenance purposes. Otherwise, operation of the well would be unmanned and there would be no daily worker trips to the facilities. Operational emissions of the proposed project would be less than significant.

Cumulative air quality impacts associated with construction-related pollutant emissions from the long-term phase of the proposed project, in conjunction with other past, current, and probable future projects, would not be cumulatively considerable, and cumulative impacts would be less than significant. With

respect to operational emissions, implementation of the proposed project would not result in substantial long-term regional emissions of criteria air pollutants and would not exceed the AVAQMMD significance thresholds for criteria pollutants. Therefore, the proposed project’s operational emissions would not be cumulatively considerable, and cumulative air quality impacts would be less than significant.

Intermittent construction activities associated with the proposed project would result in short-term emissions of diesel particulate matter (DPM), which is a toxic air contaminant (TAC). The exhaust of off-road heavy-duty diesel equipment would emit DPM during general construction activities, including site preparation, materials transport, and building construction. The proposed project is located greater than 1,000 feet from sensitive receptors. Moreover, the proposed project would comply with the CARB ATCM anti-idling measure and applicable BACT and the use of In-Use Off-Road Diesel Vehicle Regulation. Therefore, the proposed project would not expose sensitive receptors to substantial pollutant concentrations in excess of the thresholds and construction TAC impacts would be less than significant. The operation of the groundwater wells and expanded headquarters would be powered by electricity and thus would not emit any TAC emissions.

Construction of the proposed project would limit idling for diesel trucks, in compliance with CARB ATCM. Through compliance with AVAQMMD Rules, no construction activities or materials are expected to create objectionable odor. Operation of the well includes extraction and would not require treatment. Therefore, odors would be considered less than significant for both construction and operation of the proposed project.

Impacts regarding air quality would be less than significant with implementation of mitigation measures. Therefore, implementation of the Well No. 37 project would not create new or additional impacts to air quality or change the analysis and conclusions provided in the WSMP PEIR.

4.3 Biological Resources (Section 3.4 in the PEIR)

The proposed project would occur at the same location as evaluated in the WSMP PEIR. Further, the inclusion of the percolation pond would not result in an increase in the intensity of construction or operational intensity and would not impact new biological resources that were previously evaluated. As disclosed in the WSMP PEIR, the existing setting at the project site does not support any special status species. Since certification of the WSMP PEIR in 2018, the biological setting at the project site has not materially changed. Updated database reviews and regulatory listings do not indicate the presence of new site-specific biological constraints that would alter the conclusions of the Program EIR but additional special-status species that could potentially occur at the project site have been identified, as shown in Table 4-1.

Table 4-1. Status of Potentially Occurring Special-Status Species within the Well No. 37 Project Area

Common Name <i>Scientific Name</i>	Federal/State Status	General Habitat ¹	Potential to Occur within the Project Site
California Condor <i>Gymnogyps californianus</i>	Endangered/ Endangered	Condors roost on large trees or snags, or rocky outcroppings and cliffs. Nests are located in caves and ledges of steep rocky terrain or in cavities and	<u>Absent</u> . The project site could not support habitat for the species.

Common Name <i>Scientific Name</i>	Federal/State Status	General Habitat ¹	Potential to Occur within the Project Site
		broken tops of old grown conifers created by fire or wind. Foraging habitat includes open grasslands, oak savanna foothills and beaches adjacent to coastal mountains.	
Southwestern Pond Turtle <i>Actinemys pallida</i>	Proposed Threatened/None	Aquatic habitat, including creeks, rivers, wetlands lakes and ponds, for foraging for food and shelter. Variety of sites for basking include rocks, sand, mud, downed logs, emergent or submerged aquatic vegetation. Nesting typically occurs within 100 meters of aquatic habitat.	<u>Absent</u> . The project site could not support habitat for the species.
Monarch Butterfly <i>Danaus plexippus plexippus</i>	Proposed Threatened/None	Milkweed and flowering plants in fields, open areas, wet areas, or gardens. Monarchs in locations west of the Rocky Mountains overwinter in California at sites along the Pacific Coast, roosting in eucalyptus, Monterey Pines and Monterey cypress trees.	<u>Low Potential</u> . Marginal habitat for the species, including vegetation that may include flowering plants, is found at the project site.

¹ General habitat is based on USFWS descriptions of the species.

Construction at the site has the potential to impact vegetation that may provide marginal habitat for the monarch butterfly. However, the potential for this habitat is low and the project site is located in an area surrounded by similar vegetation; therefore, impacts would be reduced to a less than significant level.

As the project site is in an undeveloped area, there is the potential for impacts to sensitive natural communities that may be present on site. Implementation of Mitigation Measure BIO-6 would require either avoidance of native desert vegetation species (including CDFW sensitive natural communities) or obtainment of a native desert vegetation removal permit from the City, which involves preservation and mitigation stipulations. With implementation of this mitigation measure, impacts would be less than significant.

There is no riparian habitat, federally protected wetlands, wildlife corridor, nursery site, or locally protected tree species present at the site. In addition, the project site is not within the Antelope Valley Significant Ecological Areas (SEA) or San Andreas Rift SEA.

Therefore, development of Well No. 37 would not create new or additional impacts to biological resources, or change the analysis and conclusions provided in the WSMP PEIR.

4.4 Cultural Resources (Section 3.5 in the PEIR)

The WSMP PEIR evaluated the potential for impacts to historical, archaeological, and paleontological resources through a California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC) records search, review of previous studies, and field surveys. As the

proposed project is located in an undeveloped area, there is potential for the presence of cultural resources that have not previously been disturbed.

While the project site is unlikely to contain historic architectural resources, implementation of Mitigation Measure CUL-1 would ensure that any potential impacts would be reduced to a less than significant level. Due to the undeveloped nature of the site, there is potential for impacts to cultural or archaeological resources, including those that contain human remains. Implementation of Mitigation Measures CUL-2 through CUL-6 and CUL-10 would reduce impacts to cultural and archaeological resources to a less than significant impact.

The project site is located in an area underlain by geology which has a low-to-high paleontological sensitivity, increasing with depths below 3 feet. As well development would require drilling to a depth of 940 feet bgs, implementation of Mitigation Measures CUL-7 through CUL-9 would ensure that paleontological resources are identified, construction activities are appropriately monitored, and any discoveries are mitigated.

The inclusion of the percolation basin would result in additional land disturbance than previously evaluated in the WSMP PEIR. However, implementation of the mitigation measures identified in the WSMP PEIR would ensure that any historic, cultural, archaeological, or paleontological resources are identified, construction activities are monitored, and any discoveries are mitigated to a less than significant impact. Therefore, development of the proposed project would not create new or additional impacts to cultural resources or change the analysis and conclusions in the WSMP PEIR.

4.5 Energy (Section 3.14 in the PEIR)

Construction of the proposed project would require the temporary use of construction equipment. The majority of this equipment would be diesel-fueled; smaller construction equipment may be gasoline- or natural-gas fueled. As evaluated in the WSMP PEIR, construction of the well project would have minimum demand for gasoline and diesel resources compared to the State's annual fuel usage. There would be adequate capacity for the State's gasoline and fuel resources to serve the proposed project. In addition, since the WSMP was certified, construction equipment is required to meet even more stringent emissions and fuel economy standards. Operation of the well would require approximately 420 kW of total power for operation, based on the anticipated head and capacity of Well No. 37. As shown in Appendix AQ, the operation of Well No. 37 would be in the range of anticipated energy use for the long-term wells evaluated in the WSMP PEIR. PWD would continue to work closely with its electricity and natural gas partners to ensure consumption is not wasteful and can be handled by the electrical grid. The proposed project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy sources during construction or operation.

In addition, the proposed project would be consistent with all applicable state regulations governing the accelerated retrofitting, repower, or replacement of heavy-duty diesel on- and off-road equipment. Operation of the well would be consistent with State energy goals to include energy efficient equipment such as system pumps and lighting to minimize energy impacts. Additionally, PWD has developed alternatives for providing electrical generation using wind, hydraulic, natural gas and sun resources, which could be used to promote energy efficiency throughout PWD's operations. These energy efficiency

measures would reduce the overall energy requirements associated with all facilities included in the proposed project. Construction and operation of the proposed project would not conflict with applicable energy efficiency policies or standards.

Therefore, development of the proposed project would not create new or additional impacts to energy or change the analysis and conclusions in the WSMP PEIR.

4.6 Geology/Soils (Section 3.6 in the PEIR)

Geology and soils were evaluated in the WSMP PEIR, including the potential to expose people or structures to substantial adverse effects involving earthquake faults, ground shaking, seismic-related ground failure and landslides, result in substantial soil erosion, be located on expansive soils, or have soils incapable of supporting reclaimed water or water disposal systems. With Mitigation Measure GEO-2, a geotechnical report prepared for the well design would include an analysis of the soil type, expansion potential, subsidence risk assessment, and recommendations from the report would be incorporated into facility design, therefore mitigating any potential impacts associated with expansive soils and risks associated with subsidence. Further, construction of the well would be in accordance with Department of Water Resources California Well Standards and comply with conditions set by the County of Los Angeles well permit, ensuring well structural stability to the maximum extent possible. With implementation of mitigation measures, geologic instability impacts would be less than significant for long-term wells.

The proposed project would require land disturbance to develop the well and install the percolation basin. If land disturbance is equal to or greater than 1 acre, a SWPPP would be developed and implemented in accordance with local and state requirements to minimize erosion and sedimentation during construction activities and post-construction operation.

The proposed well would not involve the use of septic tanks or alternative reclaimed water disposal systems and would therefore have no impact on soils being incapable of adequately supporting septic tanks or alternative reclaimed water disposal systems. Potential impacts on paleontological resources or site or unique geologic features are discussed in Section 4.4 Cultural Resources.

While the percolation basin would nominally increase the amount of land disturbance associated with development of Well No. 37, the proposed project would comply with all applicable design and construction standards and regulations and implement Mitigation Measure GEO-2. Therefore, development of the proposed project would not create new or additional impacts to geology or soils, or change the analysis and conclusions in the WSMP PEIR.

4.7 Greenhouse Gas Emissions (Section 3.3 in the PEIR)

Construction of the proposed project would result in generation of greenhouse gas emissions associated with the use of construction equipment and construction worker vehicles. Operation of the well would generate direct greenhouse gas emissions from mobile sources (i.e., periodic facility maintenance visits) and indirect source emissions from electrical consumption to power the well. As determined in the WSMP PEIR, it is anticipated that greenhouse gas emissions from construction and operation of the well and supporting facilities would not exceed the AVAQMD's screening threshold. Therefore, the proposed

project would not generate greenhouse gas emissions, directly or indirectly, that would have a significant impact on the environment.

The primary source of greenhouse gas emissions would be generated during project construction, which would be temporary in nature. Construction equipment would be selected and used in compliance with all applicable regulations, including the United States Environmental Protection Agency (USEPA) Heavy Duty Vehicle Greenhouse Gas Regulations, CARB ACTM and the low carbon fuel standard. Emissions associated with the operation of the well are anticipated to be similar to emissions associated with current power consumption. Energy providers would be required to comply with the State's Renewables Portfolio Standard. Consequently, the implementation of the proposed project would not generate substantial amounts of GHG emissions that would hinder the State's ability to achieve the energy goals and reducing greenhouse gases. Therefore, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases.

Development of the proposed project would not create new or additional impacts related to greenhouse gas emissions, nor change the analysis and conclusions in the WSMP PEIR.

4.8 Hazards and Hazardous Materials (Section 3.7 in the PEIR)

Development and operation of the production well would include the temporary transport, use, and disposal of hazardous materials (gasoline, paint, hydraulic fluids) during construction. Compliance with all applicable federal, State, and local regulations regarding the handling, storage, transportation, and disposal of hazardous materials would reduce potential impacts associated with these activities, including accidental releases, to less than significant. As the well facility would only consist of equipment to extract and transport raw water and would not include any treatment, hazardous materials would not be associated with regular operation.

The project site is located within one mile of an active State response site on a list of hazardous waste facilities subject to corrective action (i.e., AFP 42 located at the existing Palmdale Regional Airport). The US Air Force constructed and installed a groundwater treatment system to extract, treat and inject impacted groundwater. Prior to construction of the well, PWD would coordinate with the US Air Force, SWRCP and DTSC to ensure no contamination would occur and impacts would be less than significant. In addition, the project location within the airport influence area (AIA) of the Palmdale Regional Airport, (approximately 1.5 miles northeast of the project site) has the potential to result in intrusions to airport operations. To prevent impacts to airport operations, Mitigation Measures LU-1 through LU-3 would be implemented to ensure coordination prior to and during construction.

Construction of the project would occur on a vacant, undeveloped parcel and would not impair public right-of-way (ROW). Transportation of large construction equipment or construction materials (e.g., truck haul trips) to and from the project site may temporarily slow traffic near the project site; however, truck trips would not require road closure or impede emergency evacuation plans or emergency response plans.

The project site is located more than ½ -mile from the closest existing school (SOAR High School). Therefore, no hazardous materials would be emitted or handled within ¼-mile of a school and there would be no impacts to an existing or proposed school.

Drilling, testing, and operation of the well and all its components, including the percolation basin would comply with all applicable federal, State, and local standards and regulations. No additional hazards or hazardous materials beyond what was evaluated in the WSMP PEIR are anticipated to be transported, used, or disposed during construction or operational activities. Therefore, development of the proposed Well No. 37 project would not create new or additional impacts related to hazards and hazardous materials, nor change the analysis and conclusions in the WSMP PEIR.

4.9 Hydrology and Water Quality (Section 3.8 in the PEIR)

Proposed project components, including the well and the percolation basin, have the potential to impact hydrology and water quality. The proposed well withdraws groundwater for potable water supply and the percolation basin promotes groundwater recharge.

Construction of the proposed project would include site preparation, mobilization of equipment, well drilling, water quality testing, and installation of well casing, gravel packing and finishing with a cement seal. These activities could introduce chemicals and sediment to runoff and degrade water quality. If land disturbances associated with the proposed project are greater than one acre, a Local Stormwater Pollution Prevention Plan (LSWPPP) would be developed to prevent impacts to water quality. A Wet Weather Erosion Control Plan (WWECP) would also be developed to implement temporary erosion and sediment control BMPs for the rainy season. During well testing, low-flow wastewater would be routed to the percolation basin to allow for groundwater recharge. Prior to discharging wastewater to percolation basin, it would be stored in temporary storage tanks of sufficient capacity to sufficiently settle suspended solids within the discharge to meet all applicable requirements. Further, implementation of Mitigation Measure HYD-2 would ensure that source control BMPs are implemented during well maintenance to prevent introduction of sediment and chemicals to runoff during operation. Well development would not degrade water quality, including groundwater quality.

As the proposed project withdraws groundwater, operation of the well has the potential to affect the groundwater table level and groundwater supplies. With implementation of Mitigation Measure HYD-3, PWD would coordinate with the Antelope Valley Watermaster Engineer to determine operational criteria for the well to ensure that the well does not result in a net deficit of aquifer volume or a lowering of the groundwater table below permitted use. In addition, the percolation basin for low-flow wastewater during testing would encourage groundwater recharge.

Well construction activities and finishing would result in land disturbance. Development of the LSWPPP (if land disturbance is greater than one acre) and a WWECP is included in the design of the project to minimize erosion and sedimentation. Implementation of Mitigation Measure HYD-1 would ensure preservation of existing vegetation to the maximum extent practicable and compacting unvegetated areas to stabilize soils. Waste waters during testing would be discharged to a designated discharge point, either the percolation basin (for low flows) or an unlined drainage channel north of the project site in accordance with a permit with the Regional Water Quality Control Board.

Construction of the well would require only minimal amounts of water, and the project would not introduce substantial increases in impervious area; therefore, the project would not create or contribute runoff water which could exceed the capacity of the existing or planned stormwater drainage systems.

The project site is not located within a flood hazard area and there are no levees or dams within the project area.

The proposed project would include similar scope and is proposed at the same location as was evaluated in the WSMP PEIR. The inclusion of a percolation basin would further improve groundwater recharge during well testing. Development of the proposed Well No. 37 would not create new or additional impacts to hydrology and water quality or change the analysis and conclusions of the WSMP PEIR.

Groundwater extraction associated with the proposed project will be consistent with requirements of the Antelope Valley Watermaster. Well 37 will be constructed in accordance with applicable California Department of Water Resources well standards and will require amendment of the existing drinking water permit from the California Division of Drinking Water.

4.10 Land Use / Planning (Section 3.9 in the PEIR)

The proposed project, including the percolation basin, does not include any changes that would impact land use or planning as evaluated in the WSMP PEIR. The project site is not located within an existing community and is also not a linear project and would therefore not create a barrier or physically divide an existing community. As noted in Section 4.8, the project site is located within the Palmdale Regional Airport AIA. As such, implementation of Mitigation Measures LU-1 through LU-3 would be implemented to ensure that any activities that may intrude on airport operations would be coordinated with County of Los Angeles Airport Land Use Commission (ALUC) and the Airport prior to construction. The project site is not located within any habitat conservation or natural community conservation plan. Therefore, well development would result in a less than significant impact with mitigation. Development of the proposed Well No. 37 would not create new or additional impacts to land use and planning or change the analysis and conclusions of the WSMP PEIR.

4.11 Noise (Section 3.10 in the PEIR)

The WSMP PEIR addressed the potential for noise and vibration impacts associated with development of the well at the programmatic level and remain applicable to the proposed project. Construction noise could exceed the County maximum permissible sound levels; similarly, well drilling could result in ground-borne vibration or ground-borne noise levels. The proposed project site is located approximately 3,000 feet from an existing residential neighborhood. However, with implementation of Mitigation Measures NOISE-1 through NOISE-3, impacts related to construction noise activities adjacent to sensitive receptors and ground-borne vibration and noise levels would be reduced to less than significant. The well is enclosed within the well house and would be designed in accordance with noise ordinates of the City and County to ensure that noise thresholds at the property boundary do not exceed day and nighttime limitations for neighboring land uses. Operation of the facility would not increase ambient noise levels in the project vicinity above levels existing without the project. Further, implementation of Mitigation Measure NOISE-4 requires post-construction noise monitoring to ensure that operation of new equipment is in compliance with local noise ordinances. Therefore, impacts associated with noise would be reduced to less than significant.

The project site and existing surrounding conditions remain the same as evaluated in the WSMP PEIR. Construction of the percolation basin would not substantially increase construction noise. Development of Well No. 37 would not result in additional noise or ground-borne vibrations that were not evaluated in the WSMP PEIR. Therefore, the proposed project would not create new or additional noise impacts or change the analysis and conclusions of the WSMP PEIR.

4.12 Transportation (Section 3.12 in the PEIR)

The analysis of potential impacts to traffic and transportation in the WSMP PEIR determined that development of the well, at the programmatic level, would result in a less than significant impact with mitigation. Construction of the proposed project would result in temporary increases in vehicle trips and vehicle miles traveled on local and regional roadways. The number and type of equipment vehicles and worker vehicles required for construction of the proposed project could include up to 8 pieces of equipment and 10 worker vehicles, respectively. Implementation of Mitigation Measure TR-1 would require development and use of a Traffic Control/Management Plan to perform traffic counts to understand existing traffic conditions on roadways near the project site at the time they are constructed. Using these traffic counts, the Plan would recommend specific mitigation measures.

Construction activities could also potentially result in inadequate emergency access. While it is not anticipated that construction activities would require road closures, truck trips associated with moving materials or construction equipment could potentially slow traffic near the project site. Implementation of Mitigation Measure TR-2 requires coordination with emergency service providers at least one month prior to construction to minimize impacts on emergency access.

Although the project site is located within the Palmdale Regional Airport AIA, construction would not change traffic patterns that would potentially impact air traffic safety. The proposed project does not include any changes to roadway design.

Operation of the well would not require daily staffing and only periodic maintenance; therefore, operation would not result in a noticeable number of vehicular trips that would affect traffic volume or vehicle miles travelled on local or regional roadways.

Beyond the inclusion of the percolation basin, the proposed project would not result in any further changes to construction or operational activities that were not evaluated in the WSMP PEIR. Construction and operation of the proposed project would result in less than a significant impact with mitigation. Therefore, the proposed project would not create new or additional transportation impacts or change the analysis and conclusions of the WSMP PEIR.

4.13 Tribal Cultural Resources (Section 3.13 in the PEIR)

The WSMP PEIR evaluated the potential for impacts from well development to tribal cultural resources at a programmatic level. Mitigation Measure TCR-1 requires the future AB52 consultation prior to all long-term WSMP components, including well development. As such, an AB52 consultation shall be conducted prior to any ground-disturbing activities, issuance of grading permits, or initiation of construction activities associated with the proposed project.. In the event that tribal cultural resources are identified,

PWD shall develop mitigation measures, including, but not limited to those capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource, in consultation with the California Native American tribe. With implementation of Mitigation Measure TCR-1, the proposed project would not create new or additional impacts to tribal cultural resources or change the analysis and conclusions of the WSMP PEIR.

4.14 Utilities / Service Systems (Section 3.14 in the PEIR)

Evaluation of potential impacts from well development on utilities and service systems were developed at the programmatic level. The proposed project would not exceed wastewater treatment requirements of the RWQCB. During construction, workers would generate only minimal volumes of wastewater; wastewater from portable toilets would be collected and appropriately disposed of at permitted liquid waste disposal stations. Operation of the well includes extraction of potable water and would not require any full-time employees or water. As a result, construction and operation would not generate a substantial increase in wastewater and would not exceed wastewater treatment requirements.

While the proposed project would include groundwater extraction for the potable water supply, it would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities as part of the proposed project scope. The well would extract groundwater from within the PWD service area to meet projected growth and water demand and would not require new or expanded water supply resources or entitlements.

Construction of the well would include a minor increase in impervious surfaces but would not substantially increase runoff at the project site. This minor increase in impervious surfaces would be managed through on-site drainage features included in design of the facility and would not expansion of off-site stormwater drainage facilities.

Construction of the proposed project would generate solid waste. The proposed project would comply with construction waste recycling requirements, including Chapter 20.87 of LA County Code and Section 4.408.2 & 5.408.1.1 of the 2016 CalGreen Code. Any construction waste that is not recycled and is deferred to the waste stream would be disposed of at the Antelope Valley Landfill or Lancaster Landfill – both with sufficient capacity. Operation of the well would not generate solid waste and would not impact landfill capacity.

Operation of the well involves water supply collection and transport and would not generate any wastewater, nor require the construction of new or expanded water or wastewater treatment facilities. While the project involves extraction of potable water, this supply would not require new or expanded water supply resources or entitlements.

The proposed project would result in a less than significant impact on utilities and service systems and would not create new or additional impacts or change the analysis and conclusions of the WSMP PEIR.

4.15 Wildfire

Any construction activities would adhere to a Maintenance and Protection of Traffic Plan to ensure that emergency response vehicles or emergency evacuations would not be affected. Operation of the project would not result in any interference with an emergency response plan or emergency evacuation plan.

The proposed project is located within an LRA designated as non-VHFHSZ. Therefore, the proposed project would not exacerbate wildfire risks nor expose project occupants to pollutant concentrations from a wildfire or uncontrolled spread of wildfire.

Construction and operation of the proposed project would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. Operation activities at the proposed site would be limited to maintenance and inspection visits from staff. These operational activities would not exacerbate fire risk.

Proposed grading at the site is minimal and the surrounding area is generally flat. Proposed stormwater management measures at the site to maintain existing general drainage patterns would comply with local, regional, and state regulations. The proposed project would not expose people or structures to significant risks as a result of post-fire slope instability or drainage changes.

4.16 CEQA Required Sections

4.16.1 Growth-inducing Impacts of the Program

Section 5 of the WSMP PEIR provides a discussion of potential growth inducing impacts that is relevant to this Addendum. The growth inducing impacts discussed in the PEIR state that the WSMP would not have a direct growth inducement effect, as it does not propose development of new housing and would not result in substantial permanent employment that could indirectly induce population growth. This is true for the proposed project.

4.16.2 Significant and Unavoidable Adverse Impacts

The significant and unavoidable impacts identified in the WSMP PEIR would remain the same. There are no new significant unavoidable impacts as a result of the proposed project.

4.16.3 Irreversible and Irretrievable Commitment of Resources

The commitments associated with the Program are discussed in Section ES.6 of the WSMP PEIR. The discussion presented there is applicable to the WSMP, including the proposed project.

4.16.4 Environmentally Superior Alternative

Section 6.3 of the WSMP PEIR identified the Environmentally Superior Alternative as the Reduced Project Alternative, which presents a tradeoff between achieving project objectives and impacting the environment. However, without construction of long-term components, the Reduced Project Alternative

may not meet the project objective of providing infrastructure to meet future growth within PWD's service area.

No information is presented in this Addendum to change the identification of environmentally superior alternatives as presented in the Program EIR.

5. Federal Cross-Cutting Environmental Regulations Evaluation

Palmdale Water District received a Bureau of Reclamation WaterSMART grant. To assist in compliance with the federal environmental requirements, this document includes additional analysis relevant to federal cross-cutting regulations (federal cross-cutters or CEQA-Plus).

This section describes how the proposed project complies with relevant federal laws, executive orders, and policies, as well as the status of any required consultations.

5.1 Federal Endangered Species Act

Section 7 of the federal Endangered Species Act (ESA) requires federal agencies to ensure that their actions do not jeopardize the continued existence of endangered or threatened species or destroy or adversely modify designated critical habitat. This process involves consultation with the U.S. Fish and Wildlife Service (USFWS) or National Marine Fisheries Service (NMFS) to evaluate potential impacts of the proposed action. If adverse impacts are identified, the agency must incorporate measures to minimize harm and comply with the Act's conservation requirements.

As discussed in Section 4.3, the proposed well would not affect any newly federally listed biological resources beyond those previously evaluated in the WSMP PEIR. Additional federally listed species identified by the U.S. Fish and Wildlife Service (USFWS) as potentially occurring within the project vicinity include the southwestern pond turtle, California condor, and monarch butterfly. The project area does not contain suitable habitat for the southwestern pond turtle or the California condor. Furthermore, no significant impacts to monarch butterfly habitat are anticipated from installation or operation of the proposed well, as milkweed and other key pollinator host plants are reported as predominantly absent within the anticipated disturbance area. In addition, the project is not located within a marine or coastal habitat. No additional consultation or further management of federally listed species is anticipated for the completion of this project.

5.2 National Historic Preservation Act, Section 106

Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to consider the effects of their undertakings on historic properties listed in or eligible for the National Register of Historic Places. The process involves identifying historic resources, assessing potential impacts, and consulting with the State Historic Preservation Officer (SHPO) and other stakeholders to seek ways to avoid, minimize, or mitigate adverse effects.

An Area of Potential Effects (APE) was established for the proposed project to evaluate potential impacts to historic properties in accordance with Section 106 of the National Historic Preservation Act. As noted in Section 4.4, a California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC) records search, review of previous studies, and field surveys were conducted. As the proposed project is located in an undeveloped area, no historic properties were identified within the APE.

The State Historic Preservation Office and appropriate Native American tribes will be consulted, as required, and concurrence with the finding will be obtained prior to project implementation.

Based on the above, a finding of “No Historic Properties Affected” or “No Adverse Effect” is anticipated.

5.3 Archaeological and Historic Preservation Act

The Archaeological and Historic Preservation Act (AHPA) requires the preservation of historical and archaeological data that might otherwise be lost or destroyed as a result of federally funded projects or licensed activities. It authorizes the recovery, protection, and preservation of archaeological resources and mandates coordination with appropriate agencies to mitigate impacts.

As reported within Section 4.4, there is potential for the presence of cultural resources that have not previously been disturbed, and low-high reported paleontological sensitivity. Compliance with the Archaeological and Historic Preservation Act of 1974 is anticipated to be achieved by the implementation of Mitigation Measures CUL-2, and CUL-6 through CUL-10. These measures would reduce impacts to cultural and archaeological resources to a less than significant impact. No further consult is required to comply with the Archaeological and Historic Preservation Act.

5.4 Clean Air Act

The Clean Air Act (CAA) is the primary federal law regulating air emissions from stationary and mobile sources to protect public health and the environment. It authorizes the U.S. Environmental Protection Agency (EPA) to establish and enforce National Ambient Air Quality Standards (NAAQS) and to regulate hazardous air pollutants. Projects subject to federal approval must demonstrate compliance with applicable air quality standards and permitting requirements to minimize air pollution impacts.

The proposed well would comply with the federal CAA through adhering to all applicable regulatory compliance administered by the AVAQMD and the CARB. As demonstrated within Section 4.2, construction and operational emissions would remain below applicable significance thresholds, would not conflict with the State Implementation Plan or the AVAQMD Ozone Attainment Plan, and would not result in violations of federal or state air quality standards.

5.5 Coastal Zone Management Act

The Coastal Zone Management Act (CZMA) was enacted to preserve, protect, and responsibly develop the nation’s coastal resources by encouraging states to implement coastal zone management programs. It

requires that federal actions, activities, and permits affecting the coastal zone be consistent with a state's approved coastal management plan. Coordination with the state's Coastal Management Program is essential to ensure compliance and avoid impacts to sensitive coastal resources.

The proposed well is not located within a mapped coastal zone as reported by the California Coastal Management Program on behalf of the National Oceanic and Atmospheric Administration (NOAA). No further consult is required.

5.6 Coastal Barrier Resources Act

The Coastal Barrier Resources Act (CBRA) was enacted to discourage development in undeveloped coastal barrier areas by restricting most new federal expenditures and financial assistance within designated Coastal Barrier Resources System (CBRS) units. The CBRA aims to protect natural barrier features that buffer storm damage, provide wildlife habitat, and support coastal ecosystems. Federal agencies must ensure that proposed projects avoid reliance on federal funding or assistance within these protected areas to maintain the Act's conservation objectives.

The proposed well is not located within a CBRS unit as reported by the USFWS. No further consult is required.

5.7 Farmland Protection Policy Act

The Farmland Protection Policy Act (FPPA) seeks to minimize the unnecessary and irreversible conversion of prime farmland to non-agricultural uses resulting from federal programs or federally funded projects. It requires federal agencies to evaluate potential impacts on farmland and consider alternatives that would reduce adverse effects.

The project area is mapped by the California Department of Conservation as "other land", which is defined as "Land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than forty acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land". The project area is surrounded by similarly mapped land and intermittently mapped "Urban and Built-Up Land" and is not located within any mapped "Important Farmland" area as identified by the state of California. The installation of the well will not change the overall character of the surrounding area. Further consultation regarding the Farmland Protection Act is not required.

5.8 Executive Order 11988 – Floodplain Management

Executive Order 11988, Floodplain Management, requires federal agencies to evaluate the potential impacts of their actions on floodplains and to avoid, to the extent possible, adverse effects associated with floodplain development. Agencies must consider alternatives to siting projects in floodplains and, if no

practicable alternative exists, implement measures to minimize harm. This process ensures that federal activities reduce the risk of flood damage and protect the natural and beneficial values of floodplains.

The project area is not located within a special flood hazard area or the 100-year floodplain per Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Map Number 06037C0700F. The project area is located within FEMA Flood Zone X (0.2% Annual Chance Flood Hazard), which represents an area of minimal flood risk. Additionally, the project would not substantially increase impervious area. No further consult regarding floodplain management is required.

5.9 Federal Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, and Executive Order 13168

The Migratory Bird Treaty Act (MBTA) prohibits the take, harm, or possession of migratory birds, their nests, or eggs without a permit from the U.S. Fish and Wildlife Service (USFWS). The Bald and Golden Eagle Protection Act provides additional safeguards by specifically prohibiting the take, disturbance, or possession of bald and golden eagles without proper authorization. Executive Order 13186 further strengthens these protections by requiring federal agencies to integrate migratory bird conservation measures into their actions to minimize adverse impacts on bird populations and habitats.

As previously discussed within **Section 4.3**, there are no anticipated adverse impacts to any species reported within the WSMP PEIR, including the Well 37 project area. This includes migratory birds, bald and golden eagles. No further consult is required regarding the Federal Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act and Executive Order 13168.

5.10 Executive Order 11990 – Protection of Wetlands

Executive Order 11990, Protection of Wetlands, requires federal agencies to avoid, where practicable, actions that would result in the destruction, loss, or degradation of wetlands. When impacts to wetlands cannot be avoided, agencies must implement measures to minimize harm and provide appropriate mitigation. This order ensures that federal activities protect the ecological value of wetlands and maintain their natural functions for water quality, flood control, and wildlife habitat.

There are no federally mapped wetlands identified within the project area. Directly east of the anticipated well placement, the USFWS National Wetlands Inventory (NWI) Mapper reports the presence of a wetland reported as “PUSJ”, a palustrine, unconsolidated shore, intermittently flooded wetland. Should the limits of disturbance change for the well placement, the project area will be reevaluated for presence of wetlands jurisdictional to the United States Army Corps of Engineers (USACE). No further consult is required at this time regarding wetlands and waters jurisdictional to the USACE.

5.11 Wild and Scenic Rivers Act

The Wild and Scenic Rivers Act protects designated rivers with exceptional natural, cultural, or recreational values, preserving their free-flowing condition and water quality. It prohibits federal actions

that harm these characteristics and requires coordination with the managing agency for any potentially affected rivers.

The proposed well is not located within or adjacent to a mapped wild or science river as reported by the Bureau of Land Management (BLM) California. No further consult is required.

5.12 Safe Drinking Water Act – Source Water Protection

The Safe Drinking Water Act (SDWA) includes provisions for Source Water Protection to safeguard drinking water supplies from contamination. Section 1424(e) of the SDWA established EPA's Sole Source Aquifer Program to protect vital groundwater resources from activities that could compromise drinking water quality. It requires states to assess the quality and vulnerabilities of waters used for public drinking water and implement measures to prevent pollution from entering these sources.

The proposed well is not located within or adjacent to sole source aquifer per USEPA's Sole Source Aquifer Location mapping. No further consult is required.

5.13 Executive Order on Trails for America in the 21st Century

The Executive Order on Trails for America in the 21st Century promotes the expansion and enhancement of the nation's trail systems for recreation, transportation, and conservation purposes. It encourages federal agencies to collaborate with state, local, and private partners to develop, maintain, and protect trails that connect communities and natural areas.

The proposed well is not located within or adjacent to any mapped trails of significance per National Parks Service (NPS). In addition, the project area is not within or adjacent to any state, regional, or local trail system. No further consult is required.

5.14 Executive Order 13007 – Indian Sacred Sites

Executive Order 13007 requires federal agencies to accommodate access to and ceremonial use of Indian sacred sites by federally recognized tribes and to avoid adversely affecting the physical integrity of such sites. It applies to sacred sites located on federal lands, ensuring respect for cultural and religious practices. Agencies must consult with tribes when actions may impact these sites to uphold the order's protections.

Section 4.13 notes that the WSMP PEIR programmatically evaluated potential impacts to tribal cultural resources and requires completion of AB 52 consultation prior to ground disturbance. If any resources are identified that would qualify under Executive Order 13007, consultation with affected tribes would be facilitated to ensure no new or additional impacts would occur within the affected area. Further, with implementation of Mitigation Measure TCR-1, the proposed project would not create new or additional impacts to tribal cultural resources or change the analysis and conclusions of the WSMP PEIR.

5.15 Magnuson-Stevens Fishery Conservation and Management Act

The Magnuson-Stevens Fishery Conservation and Management Act governs marine fisheries management in U.S. federal waters to maintain sustainable fishery resources. It establishes regional fishery management councils and requires the use of science-based strategies to prevent overfishing, rebuild depleted stocks, and protect essential fish habitat. Federal actions that may impact designated essential fish habitats must be evaluated and coordinated with the National Marine Fisheries Service (NMFS) to minimize adverse effects.

The project area is not located within or adjacent to any marine resources. Therefore, no further coordination is required.

5.16 Environmental Justice

This section describes the socioeconomic resources in the proposed project area and the regulatory setting related to environmental justice-related issues. This section also evaluates the potential for the proposed project to disproportionately affect minority or low-income groups.

USEPA had defined environmental justice as “the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation and enforcement of environmental law, regulations and policies. Fair treatment means no group of people should bear a disproportionate share of the negative environmental consequences from industrial, governmental and commercial operations or policies” (USEPA, January 2021).

As federal environmental justice tools are not currently available, this analysis used the CalEnviroScreen mapping tool developed by the Office of Environmental Health Hazard Assessment (OEHHA). This tool identifies California communities disproportionately burdened by pollution. This mapping tool uses most recent census geography, incorporates most recent data, refined methodologies, as well as input from community-based organizations. The overall score for Census Tract 6037911100 (i.e., the tract in which the project site is located) is 84.69. In addition, the area in which the project is located is categorized as a disadvantaged community (DAC) per Senate Bill 535. As such, the census tract where the project is located experiences a high pollution burden and population vulnerability in comparison to other areas.

Any impact related to environmental justice would be significant if the proposed project would cause impacts to disadvantaged communities that are disproportionately high and adverse, either directly, indirectly, or cumulatively.

The proposed project would construct and operate the new Well 37, which would support the following primary objectives of the WSMP as described in the WSMP PEIR:

- Provide cost-effective and fiscally responsible water services that meet the water quantity, water quality, system pressure and reliability requirements of PWD customers;
- Provide future water system infrastructure necessary to meet projected growth of PWD area; and

- Ensure a potable water supply capable of meeting overall annual water demand.

Although construction of the project has the potential for short-term environmental effects as described in this addendum (including short-term impacts on air quality and noise), implementation of the project would have the long-term benefit of continuing to provide potable water service for these communities. Therefore, in consideration of the benefits provided to these communities through the implementation of this project and mitigation measures as described in this addendum, the project would not result in any disproportionately high adverse impacts on disadvantaged communities. Thus, no adverse environmental justice impacts would occur.

6. Summary of Environmental Effects

As discussed in this Addendum, the proposed modifications would not change the conclusions of the Final PEIR. The proposed modifications would not result in a new significant impact or substantially increase the severity of a previously identified significant impact. No mitigation is required beyond the commitments described in the final PEIR. The proposed modifications to the previously approved PEIR do not meet any of the conditions that would require the preparation of a subsequent or supplemental EIR as set forth in Section 15162 and 15163 of the CEQA Guidelines.

7. Determination

Per CEQA Section 15164(a), an Addendum to a previously certified EIR may be prepared if some changes or additions are necessary but none of the conditions described in Section 15162 or 15163 calling for the preparation of subsequent or supplemental EIR have occurred. The proposed modifications would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.